

Matter 7 Housing Provision

Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound?

Matter 7a Housing supply

Overall supply

Table 2 of the Plan (page 33) summarises the housing land supply for the plan period. This includes commitments, allocations and a small sites allowance (windfall) which together form a total housing supply of 14,935 dwellings. Taking commitments of 4,595 dwellings off the housing requirement of 12,600 dwellings leaves a minimum residual housing requirement of at least 8,005 dwellings.

The Topic Paper EB8 confirms that the Housing Land Supply Assessment Update November 2020 (EB15) provides the latest evidenced schedule of large site progress and anticipated delivery from developers and site promoters for all major development sites.

1. As identified in Table 2 of the Plan, the site commitments are based on April 2020 data, except small sites which are based on April 2019.
 - a. Are more recent updates available listing all housing completions since the start of the plan period and commitments (sites with planning permission)?

7.1.1 The April 2019 reference for small sites and other firm commitments is a typographical error and should refer to data at April 2020, as reported in the Housing Land Availability Report 2020 (EB13).

7.1.2 The Housing Land Availability Report 2022 (EB116) updates completions since the start of the plan period and commitments at 01 April 2022.

7.1.3 An updated Table 2 is provided at Appendix 3 identifying component elements of housing supply based on the most recent April 2022 data.

- b. Can the Council explain why sites with resolutions to grant permission are included as 'firm commitments'? Are all these sites subject to the signing of section 106 agreements or are there other reasons for the delay in granting permission? What are the timescales for the decisions to be issued? Are such sites proposed to be within the five year supply from adoption of the Plan and if so, are they justified?

7.1.4 Housing land availability and five-year land supply reporting include sites with a resolution to grant planning permission subject to a s106 agreement, separately identified as 'Other firm commitments' (OFC).

7.1.5 As part of the annual monitoring of housing supply, all large site commitments and OFC are subject to a review of likely delivery and only sites with up-to-date evidence of site progress and realistic anticipated delivery timescales from site promoters and developers are included as components of housing supply. Any commitments considered undeliverable, based on latest evidence, are identified in five-year land supply reporting as unlikely to come forward and discounted from housing supply.

7.1.6 No sites identified as OFC and contributing to Local Plan housing supply are still awaiting the signing of a s106 agreement.

- c. The table also includes undeliverable commitments of 620 dwellings. What are the reasons for these sites to be undeliverable and is their removal from the supply justified?

7.1.7 The undeliverable commitments included in Table 2 of the Plan comprise large site commitments with planning permission and other firm commitments (OFC) identified in the Five Year Housing Land Supply Report 2020 (EB14) as not likely to be built together with 22% of small site commitments discounted from potential supply based on a recommended non-implementation rate for small sites with planning permission.

7.1.8 Large site commitments and OFC identified as unlikely to come forward comprise extant commitments no longer likely to be delivered as a result of amended schemes with a reduction in units or shortly due to expire, changes in site circumstances or site ownership or sites without reasonable up to date evidence of likely delivery.

7.1.9 The updated figure for undeliverable commitments at April 2022 is 405 dwellings. This figure comprises extant planning permissions on large sites no longer likely to come forward or without robust evidence for site delivery (314 dwellings) together with the 22% discounted delivery for small site commitments (91 dwellings), (Five Year Housing Land Supply 2022 Appendix 9 Deliverability of sites EB117). Their removal from the supply based on latest evidence is considered justified.

2. Does the supply identify sufficient land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, in accordance with paragraph 69 of the Framework?

7.2.1 Table 9 Topic Paper – Housing needs and supply (EB8) demonstrates the supply of up to 20% of the housing requirement on sites of 1ha or less, at April 2021, exceeding the requirements of the Framework to accommodate at least 10% of their housing requirement on sites no larger than one hectare (paragraph 69).

7.2.2 The table has been updated below to show that the Council can continue to demonstrate the supply of up to 20% of the Local Plan housing requirement on sites of 1ha in accordance with the requirements of the Framework:

Source of supply	Number of dwellings
Completions on sites of 1ha or less 2020 – 2021 (HLA 2021)	118
Completions on sites of 1ha or less 2021 – 22 (HLA 2022)	184
Commitments on sites of 1ha or less (HLA 2022)	762
Local Plan allocation sites of 1ha or less	170
Other Brownfield Register 2021 sites of 1ha or less without planning permission	187
Windfall allowance	1,125
Total commitments on sites of 1ha or less	2,546
Local Plan housing requirement	12,600
Percentage of requirement	20%

Local Plan housing supply on sites of 1ha at 01 April 2022

3. Paragraph 74 of the Framework states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. No such trajectory appears to be in the Plan. Is there a particular reason for this? Also has consideration been given as to ‘whether it is appropriate to set out the anticipated rate of development for specific sites’ within the Plan?

7.3.1 Table 6 of the Plan sets out projected housing delivery by five-year period over the plan period 2020 – 2040 and also provides a supporting trajectory illustrating how the total housing supply is anticipated to be delivered by 2040. The information has been presented in accordance with the trajectory in the adopted Local Plan 2015 (EB114). The table includes the anticipated rate of housing development for each strategic site allocation by five-year period across the overall plan period.

7.3.2 A detailed annualised trajectory for all site allocations and commitments, including relevant windfall allowance and completions since the start of the plan period, has been provided to the Inspectors in response to Matter 6a Site allocations – General questions Q16 and included as Appendix 1.

7.3.3 Table 6 can be updated in accordance with the detailed annualised trajectory referred to above to set out the latest anticipated rate of development for each strategic site allocation within the Plan alongside a combined total for local site allocation delivery for each five year period within the overall plan period.

4. Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement?

7.4.1 Topic Paper – Housing needs and supply (EB8) explains how the housing trajectory in the Plan illustrates anticipated completions significantly above the minimum housing requirement including a 5% buffer for the first five-year period,

moved forward from later in the Plan period, to provide flexibility and allow for choice and competition in the market for land.

7.4.2 The updated annualised trajectory, Appendix 1, continues to demonstrate that as houses are completed, the managed delivery target reduces to the point that the housing requirement is expected to be achieved by 2036, in advance of the end of the twenty-year plan period to 2040.

5. Is there credible evidence to support the expected delivery rates set out in the housing trajectory? The annual housing requirement of 630 dpa would be a significant rise in house building rates from recent and historic trends in the borough. Does the evidence support that this is achievable?

7.5.1 The detailed annualised trajectory, Appendix 1, is based on latest site promoter evidence across strategic and local site allocations provided as part of Statements of Common Ground (SoCG) for strategic sites, local site allocation delivery form returns and five-year land supply form returns. The trajectory includes an update on the planning status of all site allocations and details latest site progress to provide credible evidence to support the expected delivery rates set out in the housing trajectory.

7.5.2 The latest published Housing Delivery Test (HDT) Measurement for 2021, published 14 January 2022, sets out the annual number of homes delivered for the three years to April 2021 against the number of homes required:

Number of homes required			Total homes required	Number of homes delivered			Total homes delivered	HDT 2021	2021 consequence
2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
458	419	369	1,247	566	666	776	2,008	161%	None

Housing Delivery Test: 2021 measurement

7.5.3 The anticipated HDT Measurement for 2022 will include the delivery of over 740 new homes for the period to April 2022 demonstrating that there has been a significant rise in house building rates from recent and historic trends in the district. Housing delivery in excess of the draft Plan annual housing requirement has been achieved for the past three years and demonstrates that an annual housing requirement of 630 dpa is achievable.

6. Does the allowance for windfall sites accord with paragraph 71 of the Framework?

7.6.1 Small site delivery, from planning permissions delivering up to 9 new dwellings, is an important component of housing supply, evidenced in housing land availability

annual delivery data and considered deliverable across the first three years of the five-year supply period.

- 7.6.2 The Strategic Assessment of Land Availability (SALA) 2017 (EB19) provides an updated analysis of historic delivery of small windfall sites for the 10-year period to the start of the Local Plan review demonstrating consistent delivery of an average 75dpa not including greenfield sites or sites on garden land. A continued trend for these windfall sites to come forward based on small sites delivery data is considered realistic. Furthermore, the potential supply of small sites is likely to be higher due to increased flexibility in the draft Plan and more opportunities for small exception site development on sites not specifically identified in the development plan but in accordance with the latest NPPF definition of windfall sites. A continued windfall allowance of 75 dwellings per annum (dpa) is therefore considered realistic in accordance with paragraph 71 of the Framework to be applied from year 4 onwards to avoid double counting.
- 7.6.3 Table 2 of the Plan sets out a small sites allowance of 75 dwellings per annum (dpa) from year 4 of the plan period, totalling 1,275 dwellings (17x75dpa) as a component element of total housing supply. The updated Table 2 (Appendix 3) sets out completions for year one and two, small site commitments for years three to year five and a reduced small sites allowance of 1,125 dwellings (15 x 75) for year 6 to year 40 of the plan period, as component elements of housing supply.

Five year housing land supply

Within the Housing Needs and Supply Topic Paper (EB8) at Table 7, the Council suggests they are able to demonstrate a 6.57 year housing land supply. This is for the period 1 April 2020 to 31 March 2025 and is based on a minimum annual housing requirement of 630 dpa.

7. Although paragraph 68 of the Framework seeks that planning policies identify a supply of deliverable sites for 'years one to five of the plan period', the PPG advises that 'strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan'. No practical purpose is served by assessing five year supply from an earlier date.
- a. Can the Council produce a five year supply calculation looking forward five years from around the intended date of adoption of the plan? Is it based on robust evidence and is it justified?

- 7.7.1 A five-year supply calculation looking forward five years from an intended date of adoption of 01 April 2024 is shown below for the period to 31 March 2029, based on the detailed annualised trajectory, Appendix 1, and comprising deliverable large and small site commitments at April 2022, latest anticipated delivery of strategic and local site allocations, and a small sites windfall allowance:

	Five year housing supply: 01 April 2024 – 31 March 2029	Local Plan supply
	Large site commitments/ OFC at 01/04/2022	1,304
	Small site commitments at 01/04/2022 (discounted by 22%)	107
	Strategic site allocation delivery	3,217
	Local site allocation delivery	803
	Small sites windfall (4x75dpa)	300
A	Total deliverable housing supply	5,731
B	Local Plan minimum housing requirement	630
C	Five year requirement including 5% buffer	3,307
D	Percentage of 5 year housing supply [(A divided by C) x 100]	1.73
	Years supply [D multiplied by 5 years]	8.66

Five year housing supply 01 April 2024 – 31 March 2029

7.7.2 Robust evidence is provided as part of five-year land supply reporting to justify the projected delivery of current commitments with planning permission or other firm commitments included in the figures above. The response to Q5 above sets out the evidence base justifying the latest projected delivery of strategic and local site allocations in the Plan.

b. Are any adjustments necessary to take account of any shortfall or oversupply since the Plan's base date?

7.7.3 Completions of 745 dwellings (HLA 2021 EB12) and 771 dwellings (HLA 2022 EB116) were delivered for the first two years of the plan period, an oversupply of 256 dwellings above the minimum Local Plan requirement of 630 dpa.

7.7.4 Projected delivery for the following two years, 2022/23 and 2023/24, prior to anticipated adoption of the Plan in April 2024 identifies likely delivery of a further 149 and 1,117 dwellings respectively, an oversupply of 636 dwellings above the minimum Local Plan requirement of 630 dpa.

7.7.5 The table below sets out an overall oversupply of 892 dwellings above the Local Plan minimum housing requirement for the first four years of the plan period prior to an anticipated adoption date of the Plan of 01 April 2024:

	2020/21	2021/22	2022/23	2023/24
Completions	745	771	-	-
Projected delivery	-	-	779	1,117
Local Plan minimum housing requirement	630	630	630	630
Oversupply above housing requirement	115	141	149	487
Total over-supply				892

Oversupply above Local Plan minimum housing supply 01April 2020 – 31 March 2024

8. As identified in the Council's Five Year Housing Land Supply document (2020) (EB14), a non-implementation rate of 22% is applied to small sites with planning permission. This appears to be based on recommendations in a 2013 report which reviewed the Council's land supply. Is there more up to date evidence to confirm why such a high rate is justified? Is this approach proposed for this plan period and if so, does it accord with the definition of 'deliverable' within the Framework? Overall, is the approach justified?

- 7.8.1 The non-implementation rate of 22% applied to small sites with planning permission has not been recently reviewed.
- 7.8.2 Due to the large number of small sites with planning permission, it is not possible to make a detailed assessment of each individual site and whilst it is assumed that each planning permission is deliverable until it expires, in accordance with the Framework, it is considered reasonable to discount small site delivery, for example to take into account outline planning permissions not progressed or the expiry of permissions throughout the monitoring year, to provide a cautiously realistic picture of small site delivery without over-representing supply.
- 7.8.3 The Council has been able to demonstrate more than five years' housing land supply since 2013, even with such a high discount rate, and has not been challenged on its calculation. Small sites continue to be an important component element of housing supply and this approach has been considered justified to provide a robust interpretation of deliverable in relation to small sites with planning permission particularly in the light of challenges to housing delivery in the past three years. The Council may review the approach for this Plan period on adoption of the Plan.

Matter 7b Meeting specific housing needs

Inclusive communities - Core Policy CP7

9. This policy requires developers of major housing development to demonstrate how the proposal 'will contribute to meeting identified long term needs' within relevant communities, and sets out a list of needs to be taken into account.
 - a. National policy seeks plans that meet development needs. In relation to housing needed for different groups in the community, paragraph 62 of the Framework states that this 'should be assessed and reflected in planning policies'.
 - i. Have the long term housing needs for specific groups within the District been robustly assessed and identified in the Plan? If so, what are these and are they justified?
 - ii. Are the development requirements for meeting these specific housing needs clearly defined within policies?
 - iii. If this is the case for this Plan, what is the purpose of Core Policy CP7?

7.9.1 The NPPF states that the needs of groups with specific housing requirements should be addressed (para. 62) and developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users (para. 130). Core Policy CP7 provides a holistic overview of the broad strategic types of needs that major development should seek to address in order to support inclusive and accessible communities. Subsequent policies provide further detail relating to the specific needs of different groups.

7.9.2 The long term needs of specific groups for Stroud District have been robustly assessed and identified in the Gloucestershire Local Housing Needs Assessment (EB10). The results have informed specific targets and requirements set out within housing policies within the Plan. Further detail on local housing needs by parish cluster area, including on housing mix for affordable and market housing and the need for older person housing, is set out in the addendum Local Housing Market Model (EB99).

- b. How does Core Policy CP7 relate to other policies in the Plan, such as Core Policies DCP2 and CP8, and the site allocations? Does it unnecessarily or confusingly duplicate other Plan policies?

7.9.3 Core Policy CP7 provides an overview of the broad strategic types of needs that major development should seek to address in order to support inclusive and accessible communities. It is important to emphasise the role that planning for major development can have in meeting the needs of communities. Subsequent policies provide further detail relating to the specific needs of different groups. The

policy is clear and does not duplicate specific requirements set out within these other policies.

- c. As the policy reads more like an objective, can the Council provide clarity on what is actually required from development proposals? Have any requirements been viability tested and is it clear how the policy will be implemented and measured?

7.9.4 The policy requires a developer of major housing to consider the design and accessibility of the development, in the context of local needs and demographic trends. It also means a developer contributing to the development of the community in its early stages, through a Community Development Officer.

- d. How will an applicant or decision-maker determine whether the policy has been met in a particular location? What is meant by the term 'communities the development relates to'? Can the Council point us to the evidence which demonstrates the specific long term needs of a community/settlement?

7.9.5 The policy requires a proposal for major housing development to identify how the design of the scheme will address four types of local need. The requirement could be met by showing how the scheme is providing a mix of dwellings to meet accommodation needs, how the layout and design of the public realm will meet the differing safety and mobility issues of young and older people and how the development will physically relate to local community facilities either provided on-site or integrated with existing community facilities within the local area.

7.9.6 The term 'communities the development relates to' refers to the settlement or local area that the housing development is located within. Local needs data is available, for example, down to parish area.

- e. The supporting text to the policy (paragraph 4.4 of the Plan) identifies that the policy would apply to all major housing developments of 10 dwellings or more or an outline residential application of 0.5 ha or more in size. Whilst this reflects the definition of major development within the Framework, are the thresholds justified within the context of this Plan? Would requirements be the same irrespective of the size of the scheme and is this justified and achievable? If not, is this clear within the policy?

7.9.7 The threshold for this policy is consistent with the requirements set out in Core Policies DCP2, CP8 and CP9 for such sites to provide a range of house types reflecting local needs and for the provision of affordable housing. It is unreasonable to expect smaller sites to provide for a full range of housing to reflect local needs.

7.9.8 For sites above the threshold, the requirements would be the same irrespective of the size of the scheme. This is justified as all major development should be meeting the needs of groups with specific housing requirements and matters of good design and accessibility are not matters where scale should be a determining factor.

- f. How would the policy apply to different forms of housing development, such as sheltered housing or extra care, and is this clear?

7.9.9 Core Policy CP7 has been written to ensure that major housing development provides for a range of needs. Clearly if the form of development is specifically designed to reflect the needs of one particular group, for example, sheltered accommodation to meet the needs of older people, there would not be a requirement to provide for other local needs, for example children, young people and families.

- g. The supporting text at paragraph 4.5 makes specific reference to the provision of or contribution to a Community Development Officer. This is not a requirement defined in Core Policy CP7. Is it set out in another policy and if so, is it legally compliant, justified and consistent with national policy?

7.9.10 Reference to the provision of or contribution to a Community Development Officer is referred to in the supporting text. The Council accepts that this requirement should be set out in the policy itself, which if agreed, would require a modification to the policy. Such officers can provide a vital role in helping communities to establish and to ensure that new housing is integrated with existing and planned community facilities, as supported by the NPPF at para. 93. The nature of the provision or contribution would depend upon whether the development is expected to integrate into an existing community framework (there are a number of very active community hubs supported by a number of neighbourhood officers in the District currently) or whether the development would in effect create a new community, requiring a more bespoke and tailored response.

Supporting older people and people with mobility issues – Core Policy DCP2

10. Core Policy DCP2 sets out the modelled demand for older person homes and supports the provision of specialist older person housing. On major housing developments it expects a range of house types, including two bedroom dwellings and bungalows. It also supports other listed initiatives and developments. It summarises the need for adapted housing as established through the LHNA.

- a. As the policy reads more like an objective, can the Council provide clarity on how the needs listed will be met through development? What does the policy actually require from development proposals and is this viable? How will the policy be implemented?

7.10.1 The policy sets out in one place how the Local Plan will support the housing needs of older people. The policy supports the provision of specialist older person housing in both the owner occupied and rented sectors and requires such provision to be in accessible locations. The policy also supports a range of other initiatives which support older people. To ensure the needs of older people are met in major housing developments, the policy requires house types that older

people find desirable and suitable including two bedroom dwellings and bungalows. The policy also requires specific standards to be met relating to adapted housing from new market and affordable housing and from specialist housing.

7.10.2 Housing for older people and policy requirements for a range of house types and specific adapted housing standards have been modelled through the Council's viability assessments (see EB111, for example, paragraphs 4.110-114, 8.27-8.31 and 10.55-10.57). The requirements should be designed into the development at the planning application stage and the standards for adapted housing implemented through building regulations.

b. Are all major housing development sites required to deliver two bedroomed dwellings and bungalows, and if so by how many dwellings? How is this proposed to be achieved and is it justified and viable?

7.10.3 The Plan is clear that in order to achieve mixed and balanced communities, major new developments should reflect the range of house types and sizes required to meet local needs. Core Policy CP8 explicitly requires major development to meet the housing needs for the specific parish cluster area. The Local Housing Market Model identifies needs down to parish cluster level (EB99) and sets out the number of house sizes required for both market and affordable sectors (1 bed, 2 bed, etc.) (as well as for older person housing) based upon household projections. From this information, the proportion of housing by size can be established. There is not a specific quantum requirement for bungalows, as it is acknowledged that this can be difficult or inappropriate to provide on some sites.

7.10.4 This policy will be achieved by requiring a breakdown of house types at planning application stage and checking the house type proportions against local needs. The Council has tested viability of housing sites assuming a range of house types are delivered with consideration also given to the type and likely setting of a range of site typologies (see EB111, 8.32-8.34).

c. How will sheltered housing and extra care accommodation needs be achieved? Have needs been identified for other older person accommodation such as age-restricted general market housing?

7.10.5 It is expected that specialist providers will bring forward proposals either on the basis of market demand or through the implementation of public care policies. Policy DCP2 provides a suitably supportive policy framework. It is also expected that the strategic housing allocations will provide for these needs as part of the requirement, set out within the strategic allocation policies, for a range of dwellings to address tenure, type and size of dwellings needed. A 70 bed care village is also proposed as part of strategic allocation PS20.

d. How will an applicant or decision-maker determine whether the policy has been met in regard to criteria 1-4? For instance, how will a development be expected to increase older people's engagement in community life?

7.10.6 These are not specific criteria which major housing developments, for example, will be required to comply with in order to grant planning permission. They are types of initiatives which will support older people and hence, where they require planning permission, will be supported. So, for example, an extra care scheme which is integrated with wider community facilities may provide opportunities to increase older people's engagement in community life and hence would be considered as contributing towards supporting older people.

- e. As regards the inclusion of optional standards for accessible and adaptable homes:
 - i. Does the LHNA robustly evidence an identified need in accordance with national policy (footnote 49 relating to paragraph 130 of the Framework) and the PPG?
 - ii. Does the policy accurately reflect the evidence of need?
 - iii. Whilst the policy lists the needs as percentages, how many dwellings for each category are actually needed and is this clearly identified within the Plan?
 - iv. Should the policy distinguish between the need for M4(3a) and M4(3b) categories? Has this been suitably assessed?
 - v. Does the policy take adequate account of any potential site constraints, such as topography, which may limit the suitability of a site?
 - vi. The policy is unclear how relevant development schemes will be expected to meet these needs. For instance, are 67% of all homes on development sites sought for M4(2)? Does the 8% for M4(3) form part of this or is it in addition to the 67%? Is this justified and viable and is it clear within the policy? Or is this set out elsewhere in the Plan?

7.10.7 The LHNA sets out in a section entitled "Housing for People with Disabilities" (EB10, paragraphs 9.75-9.118) the evidence of local need for M4(2) and M4(3) housing within Stroud District. The section quotes extensively from the PPG, identifying the sources of evidence to consider, which is then discussed in the commentary and referencing the Government's summary data sheet, which forms the basis of the data in the report. The justification for the application of the optional standards takes account of population projections and health demographics of the area, data from the English Housing Survey, the CLG guide to available disability data and Census data in Gloucestershire to estimate the number of households likely to require adaptations or needing to move to a more suitable home in the housing market area.

7.10.8 The final paragraph of Core Policy DCP2 reflects the recommendations of the LHNA set out in paragraphs 9.109 and 9.111 of the report:

- 8% of all housing to meet M4(3) Category 3 requirements (9.109)
- at least 25% and ideally 50% or more of specialist housing for older people to meet M4(3) Category 3 requirements (9.110)
- all specialist housing for older people should meet M4(2) Category 2 requirements (9.110)
- a target of 67% of all housing to meet M4(2) Category 2 requirements, and preferably more to take account of the lack of provision in the existing housing stock (9.111)

- 7.10.9 The estimated (rounded) numbers of households requiring M4(2) housing are set out in the LHNA (EB10, Figure 78) and the number of households requiring M4 (3) housing are set out in Figure 82. The numbers are not currently set out in the Plan. The Council is happy to include the numbers in the policy or supporting text if required.
- 7.10.10 The LHNA does not specifically distinguish in its recommendations between the need for M4 (3a) and M4 (3b) categories, although Figure 82 does set out the modelled need for wheelchair housing split between market and affordable housing. The LHNA identifies a target of 8% of all housing to meet M4 (3) requirements. Core Policy DCP2 applies these standards reflecting the needs established and terminology used in the LHNA. As the PPG states that local plan policies for wheelchair accessible homes (i.e. M4 (3a)) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (PPG Paragraph: 009 Reference ID: 56-009-20150327) it is clear that M4 (3a) accessible standard will apply to affordable housing and M4 (3b) adapted housing will apply to market housing. The Council does not consider that the requirements of national policy need to be restated in the Local Plan. Neither does Core Policy DCP2 require this clarification as the percentage required for 3a and 3b is the same. However, the Council would be happy to consider a modification making this point if it is required.
- 7.10.11 The supporting text to Core Policy DCP2 states that the Council will take account of site specific factors in applying this requirement. This wording has been proposed recognising that it may not be possible to require the standard in certain circumstances, for example if step-free access cannot be achieved due to topography. The Council recognises that the wording in paragraph 4.13 does not form part of the policy and is happy to accept a modification if required to include this wording in the policy. It may also be appropriate to refer to step-free access as an example of site-specific factors in the supporting paragraph 4.13.
- 7.10.12 Core Policy DCP2 sets out clear standards of provision to be applied for new developments. 67% of homes forming part of a development scheme should meet M4 (2) standards. In addition, 8% should meet M4 (3) requirements. The justification for these standards is set out within the LHNA at paragraph 9.111 as 75% of all new housing should be suitable for the needs of households with health problems or disabilities that affect their housing requirement. In addition, all specialist housing for older people will be required to meet M4 (2) standards and 25% of these should meet M4 (3) requirements.

7.10.13 The Council's Viability Assessment (EB111) has modelled the viability of housing within Stroud District taking into consideration the standards set out in Core Policy DCP2 (paragraphs 8.27-8.31). The viability work generally demonstrates that greenfield site typologies are viable with the policy requirements set out in the Local Plan but not all brownfield site typologies are. In these cases, the Council has only included brownfield sites in the Plan where it can be demonstrated that they are deliverable. In addition, the viability work recommends that the Council accepts site specific viability assessments at the development management stage and the supporting text to Core Policy DCP2 at paragraph 4.13 states that the Council will take account of where the requirement would render the development unviable.

f. Does the supporting text robustly justify Core Policy DCP2?

7.10.14 The Council considers that the LHNA, referred to in supporting paragraph 4.12, provides clear justification for the application of these optional standards. As is set out above, the Council is happy to set out the number of households projected to be in need of this accommodation during the life of the Plan in the policy and supporting text to underpin the justification for the requirement.

Affordable housing – Core Policy CP9

11. Questions on affordable housing are included under Matter 3 on the housing requirement. Our questions here relate specifically to Core Policy CP9, which requires at least 30% affordable housing on relevant sites above defined thresholds.

a. Is the requirement for at least 30% of housing on relevant sites to be affordable justified by robust evidence and is it viable for all housing types including specialist older persons' housing?

7.11.1 The LHNA (EB10, Figure 63) identifies a total affordable housing need that the Council should plan to deliver in Stroud District during the Plan period of 3,291 dwellings. Using the overall local housing need, as measured through the standard method calculated in 2020 of 12,760 dwellings, this identifies affordable housing need being 26% of the overall local housing need. However, the LHNA makes clear that this is only the starting point for developing policy targets, as the Council will also need to take account of the types of sites which are likely to deliver affordable housing (i.e. exclude small sites) and to consider viability (EB10, paragraphs 8.83 and 8.84).

7.11.2 The SDLP sets out a proposed housing supply of 14,935 homes, against a housing requirement of 12,600 (CD1, Table 2). The following table sets out the expected delivery of affordable housing from the relevant types of sites, taking account of existing commitments as at April 2020 and on the assumption that qualifying allocated sites and a modest proportion of small rural sites deliver 30% affordable housing. The table shows that the expected affordable housing supply using a 30% policy requirement has the potential to meet identified needs. There

is a 9% potential oversupply which the Council considers is reasonable to plan for, on the basis of potential non-delivery.

Expected affordable housing supply 2020-2040

	Total housing (Table 2 of SDLP)	Affordable housing
Commitments (at April 2020)	4,595	777
Allocated sites (assuming 30% AH)	9,065	2,720
Small sites allowance (assuming 25% of the supply are on sites of 4 or more which will deliver 30% AH)	1,275	96
Total	14,935	3,593
AH need (LHNA)		3,291

7.11.3 The Local Plan Viability Assessment Refresh Report (EB111) tests the requirements of Core Policy CP9 and explores a number of scenarios and sensitivity tests including varying the percentage of affordable housing required and the tenure mix. The SDLP is appraised in Appendix 15 as the higher policy requirement and the results discussed in paragraphs 10.35 onwards. Appendix 15 demonstrates that most greenfield sites are viable at 30% affordable housing but the Report concludes that not all development is viable, particularly for brownfield sites and the Report recommends that for these sites the Council accepts site specific viability assessments at the development management stage. However, the Council has only allocated sites in the SDLP where promoters have confirmed that the sites are deliverable.

7.11.4 The Local Plan Viability Assessment Refresh Report (EB111, Table 10.8) tests the viability of specialist older people's housing and concludes that this form of housing is likely to be able to bear some affordable housing, but not 30%. The Report notes that the PPG identifies the viability of specialist older people's housing as being justified at the development management stage and therefore the Report does not consider it necessary to develop a specific policy for this sector. (Note: The Report refers to the 2018 PPG paragraph which is now 10-007-20190509 in the 2019 update).

b. Why does the policy use the term 'at least' and how would provision above 30% be achieved? Is this viable?

7.11.5 The term 'at least' is included to allow flexibility in circumstances where additional delivery may be possible; for example, Registered Providers may be in funds to deliver in excess of the 30% secured as part of a planning permission. In these cases, it is likely but not inevitable that grant funding or additional borrowing would be required in order to maintain viability, depending upon market conditions prevalent at the time.

- c. How much affordable housing will be delivered as a result of the Plan's policies?

7.11.6 It is expected that a 30% target from all qualifying sites above the thresholds, together with existing commitments, will deliver a total of 3,618 dwellings (see above).

- d. Is the requirement for sites for 4 or more dwellings, within the AONB or designated rural areas, to provide at least 30% affordable housing justified and effective? Would this mean that a site for 4 dwellings would need to provide 2 affordable units to meet the policy, effectively providing 50% affordable housing? Is this viable on these smaller sites and deliverable?

7.11.7 The requirement is in line with NPPF para. 64 which allows a lower threshold in designated rural areas. Following a request from the District Council, the Secretary of State agreed to designate the parishes set out within Core Policy CP9 as designated rural areas in an Order which came into force in March 2018. This lower threshold is justified by the lack of affordable housing in rural areas and the need to ensure delivery to meet unmet need and maintain rural settlements as mixed and sustainable communities.

7.11.8 Under this policy, a site for 4 dwellings would have to provide 1.2 affordable units. Where the calculation results in a part dwelling, the applicant has the option to either round down the calculation – to 1 unit in this instance – and provide a commuted sum equal to the value of 0.2 unit, or round up to provide 2 units. This flexibility underpins deliverability by allowing developers to offset sales risk, depending upon market conditions. Experience of implementation has demonstrated that this policy is deliverable; furthermore, smaller sites play an important part in meeting local affordable housing need.

- e. The policy states that tenure, size and type of affordable housing will be negotiated on a site by site basis. Is this flexible approach justified and effective? Would varying tenures be viable?

7.11.9 The flexible approach is justified by the need to maximise affordable housing delivery appropriate to the specific development and to the wider area. Where viability is marginal, the ability to flex unit size, type or tenure can support viability and thus secure delivery.

- f. Core Policy CP9 also includes a general requirement for residential development to provide an appropriate density. Does this only relate to affordable housing? If not, is it set out in other Plan policies?

7.11.10 The requirement is related to all forms of housing and this is also set out within Core Policy CP8. The Council would accept a modification to remove this duplication.

- g. The supporting text at paragraph 4.21 identifies that affordable housing provision may be subject to viability, but this is not set out in the policy. Should it be and if so, is such an approach justified?

7.11.11 The approach is justified by NPPF para. 58 which sets out the assumed viability of up-to-date policies. Para. 58 then goes on to set out the approach for, and content of, viability assessments at the application stage, which negates the need for the policy to cover this aspect.

- h. The supporting text at paragraph 4.22 states that affordable housing should be provided on site other than in 'exceptional circumstances', but this is not set out in the policy. What are the reasons for this? What would constitute 'exceptional circumstances' and is the approach justified?

7.11.12 The approach is justified by the need to support mixed and sustainable communities; as a result, it is the Council's overriding intention that affordable homes are delivered alongside market housing wherever possible. The policy requires all types, tenures and sizes of housing to be provided on site, seamlessly integrated with existing development. However, in exceptional circumstances this may not be possible or desirable, dependent upon the type, size or location of the market development. For example, it may not be appropriate to locate large family affordable homes on a small flatted market development, or vice versa. If it is considered that the policy needs to state that 'exceptional circumstances' can require affordable housing to be delivered off-site, with examples given in supporting text, then the Council would be happy to accept a modification.

Gypsies, travellers and travelling showpeople sites – Core Policy CP10

Core Policy CP10 seeks to safeguard existing authorised sites for gypsies, travellers and travelling showpeople and sets targets for pitch and plot provision up to 2031. The policy provides locally set targets of up to 7 additional pitches for gypsy and traveller households and 8-12 additional plots for travelling showpeople households for the period 2016-2031. This is based on the Gloucestershire Gypsy, Traveller and Travelling Showpeople Assessment (2017) (GTAA) (EB11).

In light of the Lisa Smith v SSLUHC [2022] EWCA Civ 1391 judgment of 31 October 2022 regarding the interpretation of the Planning Policy for Traveller Sites (PPTS) and the application of that policy to gypsies and travellers who have ceased to pursue nomadic lifestyles, we asked whether the Council wished to review the assessment of traveller site needs (ID-02). In their response, the Council has published a new assessment, the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (November 2022) (GTAA 2022) (ID-04) and responses to our initial questions (ID-02-SDC and ID-03-SDC).

In relation to the District of Stroud the GTAA 2022 concludes, at Table A24, a need for 22 additional pitches for the period 2021-2040, for gypsies and travellers

who meet the ethnic definition. It also confirms, at Table A26, a need for 27 additional plots for travelling showpeople for the same period.

The GTAA 2022 also includes additional recommendations relating to transit provision and boat dwellers.

12. In response to the new assessment can the Council clarify how they propose to meet these accommodation needs during the plan period? In particular:

7.12.1 In Gloucestershire the Local Planning Authorities (LPAs) of the six Districts (Cheltenham Borough, Cotswold District, Forest of Dean District, Gloucester City, Stroud District, Tewkesbury Borough) are responsible for planning for the housing need of all communities. The County Council have a Traveller liaison team and own and manage several traveller sites and hold significant land assets. The District planning policy leads/principal officers meet regular in a County Gypsy and Traveller Officer Working Group (OWG) along with enforcement officers, One Legal and the police. The planning policy leads also meet in County Officer Planning Group (CPOG). Representatives from the County Council attend both meetings. There is also a Statement of Common Ground (February 2022) between the County and Districts in which all parties have agreed to work together to meet housing need. The Districts are currently considering how to meet the identified need and how best to implement the recommendations made in the GTAA.

In terms of Stroud District Council the following applies:

Gypsy and Traveller Needs and Provision (2020-40)

	2020-2030	2030-40
Needs (Pitches)	9	13
Commitments	16	0
Allocations	0	0
Net requirement	-7	13

Travelling Showpeople Needs and Provision (2030-40)

	2020-2030	2030-40
Needs (Plots)	17	10
Commitments	0	0
Allocations	8	0
Net requirement	9	10

7.12.2 The Gypsy & Traveller (G&T) table shows that the Council can meet G&T needs until post 2030 (i.e. we have more than a 10 years supply). The Travelling Showpeople (TS) table shows that the Council need to find TS sites to meet needs to 2030.

7.12.3 The GTAA makes the following recommendations. The Districts and County must decide on how to implement these recommendations and who will be responsible

for each action. Some implementation suggestions have been made in the table below for discussion.

Recommendations from GTAA

	Recommendation from GTAA 2022	Implementation For discussion
1	Ongoing monitoring of provision and vacant provisions should be undertaken by the local authorities, alongside discussions with different community groups, to ensure that any and additional need that may arise is identified.	LPA monitoring
2	Ensuring new provisions are located in a safe environment is important although the impact of land costs on determining feasibility must also be considered.	LPA policies
3	Identifying broad locations for new permanent sites, considering the following factors – cost, social, availability, deliverability.	LPAs with potential of County as landowner
4	Implement corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.	Discuss with LPA Housing and Property sections.
5	To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.	Stroud is currently approaching owners of sites and yards.
6	To work closely with CRT and CCT to meet the needs of the boat dwellers and constant cruisers across the study area.	Ongoing officer engagement
7	To liaise with marinas and boat yards in the area to see which could accommodate more permanent moorings (including converting some of their leisure moorings to permanent).	Stroud District and Gloucester City are setting up a meeting with CRT in February 2023 to progress.
8	To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites, yards or moorings.	Potential GTAA part 2 study? Approach landowners directly.
9	Work closely with Canal and River Trust (CRT), Cotswold Canal Trust (CCT) and National Bargee Traveller Association (NBTA) to assist them with the development of new moorings.	LPAs with navigable water to take forward.
10	To consider alternative options for developing new sites, yards and moorings such as developing them on a cooperative basis e.g. community land trust, shared ownership, or small sites owned by a local authority but rented to families for their own use.	County council GT Liaison Team and Strategic Housing Board

11	To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller, Showpeople and boat dweller communities.	County council GT Liaison Team and Strategic Housing Board
12	Prior to action being taken against sites or yards being used without planning permission, the local authorities, in partnership with landowners, occupants and relevant agencies (e.g. Showmen's Guild and National Federation of Gypsy Liaison Groups, CRT, CCT, and NBTA), to review its current, historic and potential planning status, and review the most effective way forward.	Individual LPAs
13	To consider safeguarding Gypsy and Traveller site and Travelling Showpeople yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.	Stroud District Local Plan policy already safeguards existing sites.
14	The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.	Review as part of ongoing plan making process
15	Develop a holistic vision for their work on Gypsies, Travellers, Showpeople and boat dwellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.	Raise with Strategic Housing Board?
16	Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, Showpeople, and boat dweller communities.	One session has been held in 2022. Potential for further sessions?
17	Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.	LPAs to check with their housing teams to ensure this happens
18	Better sharing of information between agencies in relation to Gypsy, Traveller, Showpeople and boat dweller communities.	Continue County wide officer group
19	During the ongoing implications of Covid-19 impacting the communities, determine help and support the local authorities and other services could provide to the households	Recommend action to County Council G&T Liaison Team
20	The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change. As such, their	Review with plan making programme

	accommodation needs should be reviewed every 5 to 7 years.	
21	Local authorities review the planning of unauthorised developments and consider granting permanent status.	Individual LPAs

a. Can any space for additional pitches and plots be found within or adjacent to existing sites?

7.12.4 The Council is in discussion with a range of community members on a number of existing private sites.

7.12.5 In Moreton Valence the Council is exploring both the rationalisation and expansion of an gipsy existing site in accordance with existing Local Plan policy. Rationalisation may provide one or two additional pitches on that site. Potential expansion is possible but no numbers have been attributed to it.

7.12.6 An existing travelling showperson site in Cam could be expanded to provide five additional plots. The Council has recommended be pre-application discussions take place and the site occupier has confirmed their wish to proceed with this approach.

b. Do new sites need to be found and if so what will be the methodology for selecting sites and the timescales for completing this?

7.12.7 New sites will need to be found for Travelling Showpeople as the tables provided demonstrate in the first 10 years. The Council are therefore actively working with Travelling Showpeople members in the District and have identified a new potential site in Longney. The Council are working with Travelling Showpeople members and have identified a new potential site in Longney. This site has a range of existing uses including residential, storage and heavy engineering. Following a site meeting, pre-application advice has now been formally sought for 8 plots/yards by the new owner. It is a site well located adjacent to Gloucester City.

7.12.8 The Council is exploring with the Gypsy & Travellers County Officer Group to put out to tender a piece of work which would include: a Call for Sites, an assessment of those found sites, an assessment of existing sites to maximise capacity, working with partners and stakeholders with land holdings to identify new sites (such as County, Network Rail, utility companies, NHS, Diocese etc), liaising with land holders adjacent to existing sites to investigate potential for expansion. With sites being found to provide numbers in the first 5-10 years, this joint procurement could secure sites in the longer term up until 2040.

c. What is the Council proposing in relation to transit provision and the accommodation needs of boat dwellers?

7.12.9 The Council (and other LPAs in Gloucestershire) are working with the Canals and Rivers Trust and the Cotswolds Canals Trust to identify permanent mooring

potential. Within Stroud there may be development opportunities such as the Brimscombe Port site (PS02) and other opportunities with Stroudwater Canal restoration up to Saul (linking to the national canal network)

7.12.10 The Council are working with the other LPAs in Gloucestershire to look at a range of policy tools and options such as temporary stopping or tolerance areas. The Gloucester Diocese are looking at potential of sanctuary stopping places and this approach also appears to be gathering some traction. Sanctuary Stopping is a way for Churches to participate in 'Negotiated Stopping' and by doing so help increase the number of places where Gypsy Roma Traveller peoples may stop over legally and safely. Negotiated Stopping was developed by the Gypsy-Traveller organisation, LeedsGATE, working with Local Authorities, communities, police and other agencies. Negotiated Stopping agrees which land can be used for temporary stopping with Gypsy Traveller folk and the landowner, including duration of stay and sometimes contribution to costs. The Local Authority provides the necessary facilities (e.g. Water, temporary toilets, refuse collection), monitoring and offers opportunity for health and welfare checks/contact with support services. Models similar to this already exist, e.g. Durham Country Council provides temporary stop-over sites at peak times of travelling demand, for example spring/summer, with similar facilities. Such sites vary in size, including laybys, car parks and industrial estate land but there is limited availability.

7.12.11 In Moreton Valence there are already six transit plots and these could be expanded by another two according to preliminary discussions with the landowners. They would be private transit pitches.

d. What changes are the Council seeking to make to the Plan in response to this new evidence?

7.12.12 The Council are not proposing to make any further changes to the Local Plan in response to the new evidence. The need is looking to be met through co-operation with the travelling communities, using relevant policies and Development Management processes in the first five years. The Local Plan review after 5 years can provide an opportunity to identify future sites. In the interim Policy CP10 in Stroud District, together with criteria contained within the national policy, provides an adequate policy framework for considering planning applications for sites.

13. Are there any unmet accommodation needs for gypsies, travellers and travelling showpeople within any neighbouring authorities and if so, how will these be provided for?

7.13.1 The ORS GTAA was published in 2017. Gloucester City did identify unmet needs for Travelling Showpeople. As a consequence the District Council did make provision for Travelling Showpeople as part of Strategic Site Allocation Policy G2 Criterion 2 to contribute to meeting the need working with the City Council. Since then the RRR consultancy GTAA report (SLP-03) analyses the policy and need context in neighbouring areas (Paragraph 2.51 concluded that GTAA's recently undertaken by neighbouring local authorities indicate that there remains some Gypsy and Traveller accommodation need throughout the region, but none have

suggested a need arising in their area should be met within the study area. Since the publication of the recent GTAA the Council has not been approached on any additional unmet accommodation needs from neighbouring authorities for gypsies, travellers and travelling showpeople that could not reasonably be accommodated within existing District, City or Borough boundaries currently. The RRR GTAA report identifies that population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, RRR Consultancy clearly identify accommodation needs should be reviewed every 5 to 7 years. The Councils will continue to co-operate on an on-going basis to meet changing provision needs.

14. Is the three stage sequential approach for site selection set out in Core Policy CP10, justified, effective and consistent with national policy?

7.14.1 DCLG Planning Policy for Traveller Sites (August 2015) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS. The GTAA is based on a methodology which provides first, an accommodation need figure based on ethnic identity; second, a figure based on the PPTS (August 2015), and a third which relates to the work interpretation (where accommodation need only takes account of those who travel in a caravan for work purposes). The GTAA identified that Local planning policies regarding the provision of new Gypsy, Traveller and Showpeople are outlined in respective Core Strategies and Local Plans. All study area local authorities have developed appropriate criteria to determine suitable locations for new sites and yards.

15. Are policy criteria A-F justified, effective and consistent with national policy? Is there unnecessary duplication with other Plan policies?

7.15.1 The last Local Plan Inspector's report in 2015 at paragraph 157 EB115 concluded that "SDC has engaged proactively with the gypsy community on its approach to meeting G&T needs, and has a good track record of permitting new sites. The recent review of national policy for traveller sites does not require any amendments to the proposed approach. On this basis, Policy CP10 provides an appropriate and effective framework for making future provision for G&T accommodation needs, which is justified with evidence, consistent with national policy and soundly based." These requirements remain in place and in this context the policy does not unnecessarily duplicate other Plan policies. The criteria usefully guide gypsy, traveller and travelling showpeople to appropriate locations, particularly if new sites are required.

Matter 7c Other housing policies

New housing development – Core Policy CP8

16. This policy sets out general requirements for residential developments.

- a. Is the policy clear or does it unnecessarily duplicate other more detailed and specific Plan policies? Is it clear how the policy will be implemented and monitored?

7.16.1 Core Policy CP8, as with other core policies, provides a broad overview of strategic policy requirements, some of which are then covered in more detail through subsequent delivery policies. The Council considers the policy is clear in its requirements for developments to provide a range of types, tenures and sizes of housing reflecting the District's housing needs as set out in the Local Housing Needs Assessment. This evidence base provides one of the means by which the policy will be implemented and monitored. The policy is also clear in the five criteria set out to achieve well designed housing developments. Whilst some of these criteria are expanded upon in other policies, for example in Delivery Policy HC1, there is no unnecessary duplication. Compliance with these criteria will be a matter of planning judgement, and are intended to be addressed at the development management stage through the submission of planning and design and access statements.

- b. The policy includes an expectation that relevant proposals 'should reflect the housing needs identified for that Parish Cluster area'. Is this evidence available? How does this apply to developments promoting new communities/settlements?

7.16.2 Detail on local housing needs by parish cluster area, including on housing mix for affordable and market housing and the need for older person housing, is set out in the LHNA addendum Local Housing Market Model (EB99).

7.16.3 The site allocation policies for the two new settlements at Sharpness (PS36) and Wisloe (PS37) refer to meeting needs for the District and the local area. This provides more flexibility to developers, as the scale of development offers the opportunity to provide both for wider District and local needs.

- c. Are any of the wording changes suggested by representors necessary for soundness?

7.16.4 The Council does not consider that any policy word changes suggested by representors are necessary for soundness.

7.16.5 A number of representors make comments about clarity and also flexibility in addressing District and parish cluster level needs but the Council believes that the current wording is consistent with the NPPF paragraph 62 in requiring needs to be reflected in planning policies. The policy is also clear about priorities, in that all development must take account of District needs and major developments should reflect the needs of parish cluster areas.

7.16.6 Some representors appear unhappy about criteria 4 and 5. However, these reflect the Government's vision for the planning system to support the transition to a low carbon future (see NPPF, para. 152) and are underpinned by more detailed delivery policies (for example, ES1, ES2 and DES3).

d. Overall, is the policy viable, justified and effective?

7.16.7 In terms of viability, the Council has tested viability of housing sites assuming a range of house types are delivered with consideration also given to the type and likely setting of a range of site typologies (see EB111, 8.32-8.34). The viability work generally demonstrates that greenfield site typologies are viable with the policy requirements set out in the Local Plan but not all brownfield site typologies are. In these cases, the Council has only included brownfield sites in the Plan where it can be demonstrated that they are deliverable.

7.16.8 Core Policy CP8 is justified by a range of evidence, most notably the evidence for a range of sizes, types and tenures of housing needed for different groups set out in the Local Housing Needs Assessment (EB10 and EB99). Criteria 1-5 have been written to address the key design requirements for well planned accessible and inclusive communities set out in the NPPF, whilst supporting the transition to a low carbon future in a changing climate.

7.16.9 Core Policy CP8 will be effective as it is underpinned by a detailed housing needs evidence base which will ensure that new housing development will address the size, type and tenure of housing needed for different groups, in accordance with the NPPF paragraph 62.

e. Does the supporting text robustly justify the policy?

7.16.10 The supporting text signposts developers to the housing needs evidence base and explains how the policy fits within the development strategy, as defined by the settlement hierarchy and how the policy will help to deliver accessibility and design objectives. The policy also defines major development for the purposes of the policy. The Council considers the supporting text succinctly justifies the policy.

Meeting housing need within defined settlements – Delivery Policy DHC1

17. The policy simply permits residential development within defined SDL, subject to 'detailed criteria defined for meeting housing needs at settlements'.

a. What are the 'detailed criteria defined for meeting housing needs at settlements'? Are these the criteria set out in Delivery Policy HC1 as referenced in paragraph 4.33 of the supporting text? If so, what is the purpose of the policy when Delivery Policy HC1 provides the detailed criteria to be met? Is there unnecessary policy duplication?

- b. Is the policy consistent with other Plan policies including Core Policy CP3, which identifies that exceptionally development adjacent to appropriate SDL may be permitted?

- 7.17.1 The purpose of Delivery Policy DHC1 is to provide a permissive housing policy specifically focussing housing development within defined settlement development limits. This underpins and supports development strategy Core Policies CP2 and CP3. The supporting text also plays an important role in clearly defining the purposes of settlement development limits.
- 7.17.2 The detailed criteria are the criteria set out within Delivery Policy HC1. However, these detailed criteria are also relevant to other limited forms of housing development outside of settlement development limits, which are allowed for through other delivery policies. Delivery Policy HC1 therefore performs a different function, identifying “universal” design principles for new housing development, irrespective of the locational purposes of the development strategy and Delivery Policy DHC1. There is therefore no unnecessary duplication.
- 7.17.3 Delivery Policy DHC1 is consistent with Core Policies CP2 and CP3 which both support development, including housing, within defined settlement development limits. Delivery Policy DHC1 does not deal with exceptions to this approach, which are dealt with through other delivery policies (for example DHC2, HC3, HC4, DHC3).

Sustainable rural communities – Delivery Policy DHC2

18. This policy supports schemes of up to 9 dwellings outside SDL at Tiers 3b and 4 settlements, subject to meeting five criteria. We’ve already asked some questions under Matter 2 that are relevant to this policy which may be duplicated here.

- a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this?

- 7.18.1 Whilst the Council rejected a development strategy based primarily on a dispersal approach, we were mindful of concerns expressed by local people during the process about allowing some flexibility to meet specific local development needs and to maintain social sustainability. To address the specific concerns of smaller more dispersed communities (eventually defined as tiers 3b, 4a and 4b settlements), we developed a policy framework for providing for specific demographic issues or local needs through a broadened small sites exceptions policy, rather than by distributing more general growth requirements.

- b. Is the Plan clear as to how decision-makers would determine whether the location of proposed development ‘adjoins’ or is ‘close to’ SDL? Is the terminology used consistent with other Plan policies including Core Policy CP3?

7.18.2 The Council considers a location adjoining a settlement development limit is clear and unambiguous. The inclusion of 'close to' is in recognition that some sites are well related to a settlement but do not share a boundary with defined settlement development limits. In these cases, the policy requires a judgement to be made by the decision maker, having regard to the settlement pattern, the local environment, character and landscape setting of the settlement.

7.18.3 Core Policy CP3 refers to development (exceptionally) 'on the edge of' or 'adjacent' to settlement development limits but importantly states that such development will be "subject to meeting criteria in the Plan's Core and Delivery policies." The use of 'on the edge of' or 'adjacent' is within the context of a broad strategic policy and the detailed acceptability of a site is subject to meeting the criteria in delivery policies such as DHC2. Therefore, the Council does not consider the terminology used in these two policies to be inconsistent or in any way contradictory.

c. Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? What if the identified need was higher?

7.18.4 The SDLP development strategy is supported by robust evidence in the form of sustainability appraisal which concludes that a dispersed pattern of development is less sustainable than a concentrated development approach, with development focussed on settlements at a higher level in the settlement hierarchy. The hierarchy itself is justified by a comprehensive assessment of the role and function of settlements.

7.18.5 The SDLP development strategy relies upon strategic and local allocations, together with a small windfall allowance to meet the identified housing requirements for the District. The purpose of Delivery Policy DHC2 is not to deliver the housing requirement for the District but to meet specific local needs arising from smaller settlements. Within this context the Council considers it would be inappropriate to provide for major development sites (10 or more dwellings) at small settlements where the development strategy is not seeking to make local site allocations (which are all 10 or more dwellings). To do so has the potential to undermine the development strategy.

d. Are the criteria listed in Delivery Policy DHC2 justified and effective?

e. The policy requires that a proposal 'would not lead to a cumulative increase of more than 10% of the settlement housing stock as at 2020. What are the housing stock numbers for each rural settlement and what would 10% equate to in dwelling numbers? Is this approach justified?

f. How does the policy relate to others in the Plan including Core Policy CP3 and Delivery Policy HC4 on exception sites? Are the policies consistent or is there unnecessary duplication or ambiguity?

g. The policy requires that any affordable housing 'will be made available for those in need with a strong local connection.' Is this approach

justified? Who will determine whether someone has a 'strong local connection' and how will this be implemented?

- 7.18.6 The policy is designed to address local needs arising from the specific settlement rather than addressing District wider needs. It is therefore justified to require development to address specific local housing needs (criterion 1) and for affordable housing requirements to meet those with a strong local connection. This ensures that the policy is consistent with Delivery Policy HC4 in providing for local needs as an exception to policy. The criterion are effective as they directly relate to local evidence of housing need. The affordable housing element of the policy will be delivered using the same established and effective mechanisms as set out in Delivery Policy HC4, which has been in operation successfully for many years.
- 7.18.7 As the purpose of the policy is to maintain a viable local community, the Council considers it essential that such proposals are supported by the local community. During the SDLP consultation process, a number of parish councils expressed support for the policy but considered they would not have the resources to develop a neighbourhood plan. As a result, the support of the parish council for a proposal is considered to be an essential component of criterion 3 to ensure the policy is effective.
- 7.18.8 Whilst the Council considers that the local needs exceptional policy approach justifies an individual size threshold of 9 dwellings, many respondents during consultation expressed concern that multiple proposals at the same settlement over time could lead to unacceptable growth levels at those settlements without the necessary services and facilities to support them.
- 7.18.9 The Council's Role and Function Study Update (EB72) sets out the number of dwellings by settlement as at 2018. The largest tier 3b settlement of Whiteshill & Ruscombe consisted of 501 dwellings in 2018 with tier 4 settlements smaller in size. Completions for the period 2011-2018 show that tier 3 and 4 smaller settlements grew in size between 1 and 4%. A 10% cumulative increase for the Plan period would therefore provide some opportunities for small scale growth at or slightly above historic levels of growth. However, levels of growth above 10% would lead to a level of dispersal which would not be in accordance with historic patterns of growth or the objectives of the development strategy. In terms of individual settlements, a 10% increase at Whitehill & Ruscombe over the 20 year Plan period would increase the settlement by 50 dwellings. The Council considers this would allow some flexibility for meeting local needs without impacting significantly upon the character of the settlement.
- 7.18.10 In order to provide a robust baseline for the implementation of this policy, the Council will produce an addendum to the Role and Function Study, rebasing the size of settlements in the settlement hierarchy to 2020, using completions set out within housing land availability reports.

Homes above shops in town centres – Delivery Policy HC2

19. Is the policy justified, effective and consistent with national policy?

- 7.19.1 Making effective use of land is a key objective of national planning policy, which has been reconfirmed within recent changes to the NPPF which require policies to set out a strategy for accommodating needs in a way which makes as much use as possible of previously developed land. This includes supporting the development of underutilised buildings for housing, including converting space above shops. (NPPF, paragraphs 119 and 120 (d)).
- 7.19.2 Delivery Policy HC2 positively encourages the use of upper floors in town and local centres for residential uses. The policy is therefore both justified by and consistent with national policy. Residential uses can play an important role in ensuring the vitality of town centres and the policy therefore forms part of an effective strategy to support shopping at ground floor levels within primary shopping areas, whilst providing for complementary uses at upper levels and within the wider town centres (working in tandem with retail policies E17 and E18).

Self-build and custom-build housing provision – Delivery Policy HC3

20. Table 13 in EB8 provides historic data for self-build and custom-build delivery since 2016. Delivery Policy HC3 supports the provision of self-build and custom-build dwellings within SDL and adjacent to SDL subject to meeting policy criteria. On strategic sites the policy requires a minimum of 2% of the dwellings to be self-build or custom-build plots, subject to demand being demonstrated.

- a. How many plots are required to meet the identified demand for this type of housebuilding during the plan period?

7.20.1 The Council's Self Build and Custom Housebuilding Register shows an average identified demand to date in the plan period of 12.5 plots per annum. Projecting to 2040 this would identify a demand of 250 plots for the plan period. There are also other sources which are available to establish local demand.

- b. How has the Council determined that 2% provision is appropriate to meet the evidenced demand? Is it viable and achievable?

7.20.2 The SDLP Delivery Policy HC3 takes forward an existing policy in the adopted Local Plan and widens the cope of the policy to support different forms of delivery. The strategic site allocations identified in the SDLP will bring forward 8,080 new dwellings. A 2% self-build requirement would achieve the delivery of 162 plots. The Council anticipates that the remainder of the demand derived from the Register (88 plots) would be met by delivery on single plot sites.

7.20.3 The Council's Viability Assessment (EB111) has modelled the viability of housing within Stroud District including the 2% self-build requirement on strategic sites (paragraphs 8.49-8.51). The viability work generally demonstrates that greenfield site typologies are viable with the policy requirements set out in the Local Plan but not all brownfield site typologies are. In these cases, the Council has only

included brownfield sites in the Plan where it can be demonstrated that they are deliverable.

7.20.4 Self-build plots have been secured as part of strategic site allocations set out within the adopted Local Plan (see EB8 Topic Paper: Housing needs and supply Page 18). The District Council has joined a Self Build Partnership with South Gloucestershire Council, to provide guidance and support for communities and developers to enable the delivery of self build plots.

- c. The policy states that at strategic sites, development briefs will set out how the plots will be delivered. As this is 'subject to demand being demonstrated' how will a developer and decision-maker determine whether a site needs to provide such plots? If there is no demand what happens to those plots?

7.20.5 The Council would expect demand to be tested at the point of pre-application/application with reference to the Register and any other evidence of local demand (for example, the Self Build Portal). If there is no evidence of demand at the time of the pre-application/application then plots would be released back for general market and affordable housing provision.

- d. The policy also states that regard will be had to site-specific circumstances and local demand in determining the nature and scale of any provision. Is it clear what such site-specific circumstances would be and how they would determine the level of provision?

7.20.6 The Council would consider site specific circumstances to be the subject of the development management process at application stage in terms of appropriate scale, location, landscape factors and design. The supporting text at paragraph 4.42 refers to self-build enhancing its immediate setting and being sensitive to the defining characteristics of the local area. Criterion 4 refers to detailed criteria which can be found in Delivery Policy HC1 which includes a range of site-specific considerations which may affect the nature and scale of provision. The Council also intends to produce a Supplementary Planning Document to support the delivery of the policy which will include advice on the production of a design framework which will be affected by site specific considerations.

- e. Are any of the policy wording changes suggested by representors necessary for soundness?

7.20.7 The Council does not consider any changes are necessary to the policy to comply with the soundness test.

Local housing need (exception sites) – Delivery Policy HC4

- 21. The policy permits affordable housing 'on sites well related to existing settlements' located 'close to, or adjoining, an accessible settlement with local facilities' (tier 3 or above) unless local need indicates it should be met

at tier 4 settlements. The policy lists six criteria and sets out when some market housing may be acceptable as part of a scheme.

- a. Is the policy consistent with national policy, including on rural housing, entry level exception sites, and the AONB?

7.21.1 Delivery Policy HC4 is consistent with national policy as set out in the NPPF, para. 78 which states that local planning authorities should support opportunities to bring forward rural exception sites to meet identified local needs. The policy also reflects the NPPF in stating that the Council will consider the inclusion of some market housing on affordable housing sites proposed under this policy where this is required to make the scheme viable.

7.21.2 The reference to entry level homes is also consistent with the NPPF para. 72 as the policy applies to sites not already allocated for housing and on sites adjacent to existing settlements. The policy does not refer explicitly to these types of sites not being permitted within AONBs, as the NPPF already makes this clear in footnote 36, but the supporting text at para. 4.45 does refer to national policy for the purposes of clarity.

- b. Are the six criteria justified and effective? In particular:

- i. How will criterion 2 apply if it is decided that the need is to be met at a tier 4 settlement?
- ii. In relation to criterion 4 is it clear which 'detailed criteria' from which policies would be relevant?
- iii. As regards criterion 6 is the approach in the policy justified and consistent with national policy and guidance? What are the reasons for specifying a maximum GIA of 100m² and removal of PD rights and is this approach justified? Are amendments to the policy necessary as suggested by representors?

7.21.3 The six criteria are justified by the requirement in national policy to ensure that the need for this exceptional form of development is properly evidenced, that the provision meets recommended standards where applicable and is not subsequently lost and that the location is as sustainable as possible, give the rural settlement focus of the policy.

7.21.4 In relation to local facilities and tier 4 settlements, the second sentence of the policy states that sites should be located at settlements with local facilities (i.e. the subject of criterion 2) but that this may be overridden where specific local need and environmental considerations indicate that provision should be made at fourth tier settlements.

7.21.5 In relation to criterion 4, the 'detailed criteria for new housing developments' are set out in Delivery Policy HC1.

- 7.21.6 In relation to criterion 6, the Council considers that this is justified and consistent with para. 78 of the NPPF as it aims to meet specific and identified local housing needs for affordable housing. The NPPF Glossary confirms that self-build and custom-build housing can be delivered as affordable housing. The maximum GIA and removal of PD rights is intended to secure the development and retention of the dwelling as being affordable.
- 7.21.7 In relation to para. 4.47 the Council accepts that the current wording effectively rules out self-build or custom-build affordable housing (or entry level homes) that are owned by the occupant. As a result, to maintain the option for these forms of housing to be owner occupied, the Council would accept a modification to clarify that management by Registered Providers only relates to affordable housing for rent.

Live-work development – Delivery Policy DHC3

22. The policy supports live-work development subject to listed criteria being met. Is it justified, effective and consistent with national policy?

- 7.22.1 Live-work units are designed to allow for living accommodation and work facilities for those residing therein. The previous adopted Local Plan (2015) contained advisory text on dealing with live-work units as developers stated at that time that it can often be challenging to obtain planning permission for developments, particularly involving a residential element, in locations outside of development boundaries (sustainable centres such as larger villages and towns with a number of services and amenities). In reviewing the SDLP and working with DM colleagues the Council identified a need to strengthen the advisory text into policy as planning applications were being made to try to circumvent strict control of housing development in the countryside under Core Policy CP15. The policy is not considered in conflict with the NPPF on supporting a prosperous rural economy as set out in paragraph 84. Paragraph 85 states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. The Council has shaped the policy to provide genuine rural employment opportunities on a site physically well-related to existing settlements. The Council therefore considers the policy is justified, effective and consistent with national policy. The policy facilitates an approach to deliver a vision of the kind of place we want to be living in, working in or visiting in the future. National policy and guidance also encourages flexible working practices, such as the integration of residential and commercial uses within the same unit. This matter has increasingly come to the fore during the Covid 19 epidemic and in addressing climate change impacts. The Council considers live-work units can have an effective part to play in supporting the rural economy.

Detailed criteria for housing developments – Delivery Policy HC1

23. The policy permits housing development (in SDL and outside SDL where permitted by other policies), subject to a list of nine criteria all being met.

- a. Are the criteria suitably clear, justified effective and consistent with national policy? For instance, is criterion 4 consistent with paragraphs 99 and 100 of the Framework?
- b. Is it clear how a decision-maker will determine whether a proposal meets the policy requirements?
- c. Does the supporting text robustly justify the policy and identify where appropriate design documents can be located?
- d. Overall, is the policy, justified, effective and consistent with national policy?

7.23.1 The criteria are considered to be clear about the issues to be addressed and the objectives to be achieved, whilst acknowledging that many detailed design considerations on a site by site basis cannot be prescribed through general criteria but are a matter of planning judgement. The matters addressed by the criteria, relating to: scale and density, the character of the settlement, open space, wildlife, heritage, amenity space, access and parking, are all important considerations for achieving good development referred to in national policy and the criteria are considered to be consistent with national policy.

7.23.2 On the matter of open space, national policy (NPPF, paragraph 99) sets out three considerations which all amount (effectively) to a balance between the value of the open space and the benefits of development (including replacement and alternative sports and recreation provision), which is reflected in the policy wording. The SDLP includes a specific policy on the protection of existing open space (Delivery Policy DCH6) which applies more detailed criteria specifically addressing the NPPF considerations.

7.23.3 On the matter of PROW, national policy (NPPF, paragraph 100) states that policies should protect and enhance public rights of way. The Council accepts that criterion 4 as currently written allows for the loss of PROW which is not provided for in the NPPF. The Council is therefore happy to accept a modification removing the words “or PROW” from the criterion.

7.23.4 Representors have queried the clarity of references to “locally valued” habitats (criterion 5) and features on site “worthy of retention” (criterion 6). In response, the Council points to the designated sites identified in Delivery Policies ES6 and ES9, for example, and to the environmental resources listed in supporting text, but would add that the onus should be upon developers to assess and demonstrate through appropriate surveys and ground investigation that no harm is being caused to natural or built resources which evidence indicates should be protected.

7.23.5 The supporting text refers to a range of published documents, including neighbourhood plans, community or parish design statements and national best practice guidance, which should be taken into account when designing developments to ensure that local characteristics (including open space) are

enhanced and local distinctiveness promoted through design. The Council publishes all of the made neighbourhood plans and adopted supplementary planning documents and more informal guidance on the Council's Planning Strategy webpages. The SDLP currently includes a link to the Local Plan review pages (on front and back covers) and when adopted the SDLP will include updated links to the Planning Strategy webpages where additional policy and guidance can be found.

- 7.23.6 Overall, the Council considers that the policy is justified by the need to ensure housing developments which: take into account the needs for different types of housing; achieve appropriate densities; maintain an area's prevailing character and setting; deliver well-designed, attractive and healthy places and provide for the necessary infrastructure including sustainable transport travel modes. The Council considers that Delivery Policy HC1 provides effective criteria to deliver the place making aspects set out in national policy (for example, NPPF paragraphs 92, 124 and 130).

Community-led housing – Delivery Policy DHC4

24. The policy supports community led housing schemes. However, it reads more like an objective rather than a policy setting out clear development requirements. What is the purpose of the policy and is it justified, effective and consistent with national policy?

- 7.24.1 The purpose of this policy is to emphasise the Council's support for community-led housing schemes and to recognise that sustainable development can be successfully achieved via a number of delivery routes. Whilst the objective is clear, the policy also defines the types of schemes considered to fall within the remit of the policy, defines what a legitimate community group is required to demonstrate and supports innovative and carbon neutral design. In so doing, the policy will be effective in delivery.
- 7.24.2 The Council considers the support for community development is already provided for in the NPPF, for example at para. 93, but the Government is also currently consulting on changes to para.78 of the NPPF to explicitly support development proposals from community-led housing groups. The consultation states: "To support levelling up and housing market diversification and delivery, we want to encourage a greater role for community-led housing groups. We propose to strengthen statements within Chapter 5 of the Framework to make sure there is more emphasis on the role that community-led development can have in supporting the provision of more locally-led affordable homes." (Open consultation, Levelling-up and Regeneration Bill: reforms to national planning policy, paragraph 12).

Replacement dwellings – Delivery Policy HC5

25. The policy restricts the replacement of dwellings outside SDL which is subject to five criteria being met. Is it justified, effective and consistent with national policy, including paragraph 80 of the Framework?

- 7.25.1 Delivery Policy HC5 is part of the development strategy to direct development to sustainable locations and to protect the quality and character of the countryside. This overall approach is justified by the evidence underpinning the development strategy and national policy as set out in the NPPF, for example at paragraphs 80 and 174. The Delivery Policy provides further detailed criteria relating to replacement dwellings to support the strategic objectives of Core Policy CP15.
- 7.25.2 The erection of replacement dwellings and extensions to existing houses can individually, and cumulatively over a period of years, have an adverse impact both on the character of individual properties and the surrounding countryside. The replacement of small rural dwellings with larger houses can radically change the character of an area to one of a more suburban nature and also reduce the supply of the smaller rural dwellings. To help protect the character of Stroud's countryside, extensions and replacements of dwellings need to be controlled in terms of scale and design.
- 7.25.3 The criteria have evolved over time and been informed by specific development management cases. The Council believes the criteria are clear and will be effective at achieving the overall objective of resisting new isolated homes in the countryside and maintaining an area's prevailing character and setting (NPPF, paragraphs 80 and 124).
- 7.25.4 Whilst the NPPF is silent on replacement dwellings in the context of preventing isolated homes in the countryside, the NPPF does recognise, in the context of Green Belt, that replacement dwellings should not be materially larger than the one it replaces (NPPF, paragraph 149). The Council considers this principle is also relevant within the context of safeguarding the character of the countryside. Criteria 3 of Delivery Policy HC5 clearly defines, in the context of Stroud District, what is considered acceptable in terms of the scale, form and footprint of replacement dwellings to ensure that replacement dwellings are not materially larger than the existing building.
- 7.25.5 A recent issue has arisen where replacement dwellings have been proposed within the extensive residential curtilage of an existing building but well away from the original building. This can also lead to adverse impacts on the character of the area and changes to important landscape views. As a result the policy includes a new criterion 4 requiring the new building footprint to be located on or to overlap with the existing footprint, unless there are defined benefits associated with re-location within the property curtilage.
- 7.25.6 In summary, the Council considers this delivery policy is justified by the overall development strategy and the need to protect the character of the countryside. The criteria will be effective as they have been shaped by and are designed to

address specific issues which have arisen at the development management stage and the overall objectives are consistent with national policy.

Residential sub-division of dwellings – Delivery Policy HC6

26. The policy sets out a list of considerations it will have regard to when determining the sub-division of existing dwellings into two or more self-contained residential units. However, does not provide clarity on whether residential sub-divisions would be permitted or not and what the determining requirements would be.

a. Is the policy justified, effective and consistent with national policy?

7.26.1 The Council will encourage the full and effective use of land in appropriate locations within existing urban areas. In particular, the conversion of houses into multiple occupation and the use of first floor premises over shops and offices, as flats, can have benefits. This approach accords with sustainable development requirements in the NPPF set out in Section 2 – Paragraph 28, Section 11 – Paragraphs 119-120, and Paragraph 86 (f) for example.

7.26.2 In the rural areas, residential sub-divisions will be discouraged owing to their relative isolation away from services. Proposals must meet the additional criteria of not requiring any further significant extensions or additions to the original building in order to undertake the conversion. This approach accords with Paragraph 80 of the NPPF that seeks to should avoid the development of isolated homes in the countryside. The policy is considered justified, effective and consistent with national policy.

b. Does the policy unnecessarily duplicate criteria within other Plan policies?

7.26.3 The approach of the SDLP is for matters of broad policy and principle to be set out within Core Policies and for more specific policy to be provided through the various delivery policies set out in the SDLP. In this case, Delivery Policy HC6 contains Development Management requirements or signposts to consider the more detailed matters. The Council does not consider there is any duplication.

c. It has been suggested that the policy should include both conversion of commercial buildings and conversion of dwellings to HMO use. Are these suggestions justified and necessary for effectiveness?

7.26.4 The Council considers the purpose of the policy to be clearly set out in both the policy and the supporting text. The policy is justified as it is consistent with the framework. Loss of employment use is generally resisted in the Local Plan approach and Core Policies CP11, E11 and E12 and the supporting text usefully sets the policy context for this. When the Local Plan is read as a whole the Council does not consider that these suggestions are justified or necessary for effectiveness.

Annexes for dependents or carers – Delivery Policy HC7

27. The policy permits annexes subject to specific criteria being met. Is it justified, effective and consistent with national policy?

- 7.27.1 The Council considers the purpose of the policy to be clearly set out in both the policy and the supporting text. With an increasingly aging population in the District residential annexes, are a common form of development that is generally proposed in order to allow relatives to live with their family with a degree of independence. In many cases, such proposals are considered to be acceptable by the Council. However, when an annexe is proposed outside of adopted settlement boundaries caution needs to be exercised to ensure that this does not result in proposals which are effectively the same as creating a new independent dwelling, which would not normally be acceptable. Planning permission is normally required for the erection of a new building in the garden that is not attached to the main house and which will be used as an annexe to provide living accommodation. Planning law in this area is complicated and whether planning permission is required often depends on the facts of each case. The Council considers the purpose and need for the policy to be clearly set out in both the policy and the supporting text. The policy is justified as it is consistent with the framework compliant with sustainable development requirements in the NPPF Section 11 where planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Extensions to dwellings – Delivery Policy HC8

28. The policy permits extensions or alterations to dwellings subject to specific criteria being met. Is it justified, effective and consistent with national policy? Does the policy unnecessarily duplicate criteria within other Plan policies?

- 7.28.1 The Council considers that Policy HC8 provides an appropriate, effective and justified framework for considering proposals for extensions to existing dwellings. Like the NPPF in section 12, the Council recognise that extensions can improve the quality and standard of the housing. The policy acknowledges that well-designed buildings and places can improve the lives of people and communities which accords with the NPPF. The NPPF seeks in Paragraph 126 the creation of high quality, beautiful and sustainable buildings and places that is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. Extensions can contribute to managing the mix of housing stock and types available. The policy does not stifle innovation, originality or innovation where the standard of design can contribute to the character, amenity and quality of an area. The policy does not unnecessarily duplicate criteria within other Plan policies as this provides detail for a specific type of development and usefully signposts the reader to other potential sources of local design quality matters as set out in the NPPF Paragraphs 28 and 29.