

# **Integrated Impact Assessment (IIA) for the Cotswold Local Plan Update**

**Interim IIA Report to accompany the Local Plan  
Update Consultation**

**February 2024**

## Quality information

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<b>Revision</b>	<b>Revision date</b>	<b>Details</b>	<b>Authorized</b>	<b>Name</b>	<b>Position</b>
V1.0	08.02.24	Initial version for client comment	09.02.24	JC	Senior Planning Policy Officer
V2.0	09.02.24	Consultation version	09.02.24	NCB	Technical Director

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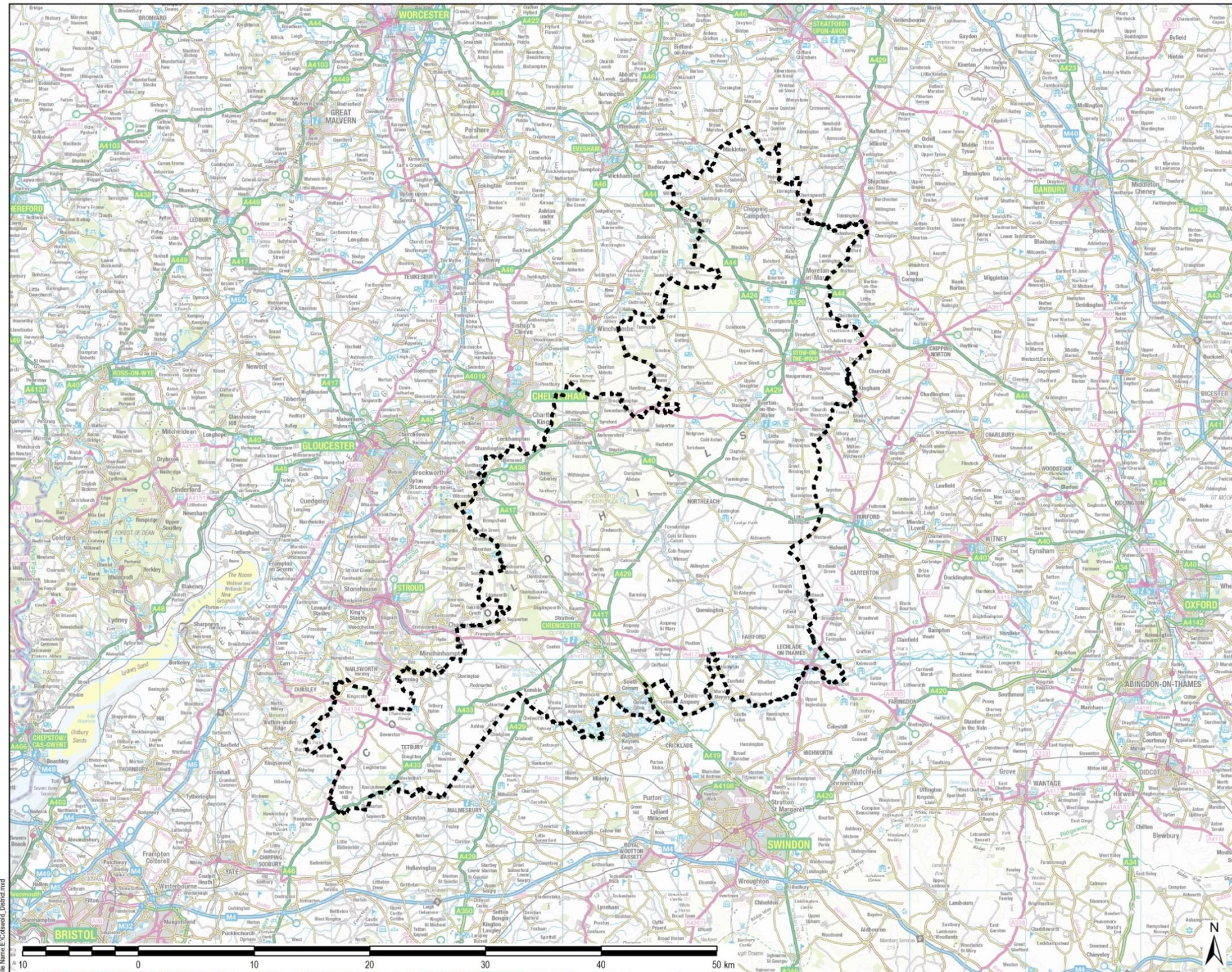
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**LEGEND**

- Cotswold District Boundary

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Purpose of Issue: **FOR INFORMATION**

Client: **COTSWOLD DISTRICT COUNCIL**

Project Title: **SA FOR THE COTSWOLD LOCAL PLAN**

Drawing Title: **COTSWOLD DISTRICT**

Drawn	Checked	Approved	Date
SS	JW	NC	16/09/2015
AECOM Internal Project No 47070565		Scale @ A3 1:300,000	

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# 1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Integrated Impact Assessment (IIA, incorporating Strategic Environmental Assessment/Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment) in support of Cotswold District Council's update of its adopted Local Plan.
- 1.2 This Interim IIA Report accompanies the *Local Plan Update Consultation* document<sup>1</sup> for consultation.

## The Cotswold District Local Plan Update

- 1.3 The Cotswold District Local Plan 2011 – 2031 was adopted in 2018.
- 1.4 In the period since adoption, Cotswold District Council has introduced a number of strategies in response to the existing and emerging challenges faced by the District, including relating to the climate and ecological emergencies, and the ongoing recovery from the Covid-19 pandemic. There is also a recognition of the need to make use of the economic opportunities available in the district in relation to the green economy. The Council has therefore committed to make the Local Plan 'Green to the Core'.
- 1.5 Alongside, there is a need for Local Plans to be periodically reviewed to keep them up to date. Housing requirements, for example, must now be reviewed at least once every five years. Whilst the adopted Local Plan is delivering on its adopted requirements and current needs, the Council is taking the opportunity to consider development needs and development strategy options for the District beyond the current Local Plan period.
- 1.6 The Cotswold District Council has therefore taken the decision to revisit the relevant policies of the adopted Local Plan. The intention is not to deliver a full-scale update – effectively a replacement Local Plan – but instead undertake a targeted update focussing on specific issues. It will also consider development needs up to 2041 and options for how these may be delivered.
- 1.7 Key information relating to the Local Plan Update is presented in **Table 1.1**.

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<sup>1</sup> Cotswold District Council (February 2024) Cotswold District Local Plan Update Consultation

**Table 1.1: Key facts relating to the Cotswold Local Plan Update**

<b>Name of Responsible Authority</b>	Cotswold District Council
<b>Title of Plan</b>	Cotswold District Local Plan Update
<b>Subject</b>	Development plan
<b>Purpose</b>	<p>Cotswold District Council is partially updating its adopted Local Plan whilst considering development needs up to 2041 and options for how these may be delivered.</p> <p>The updated Cotswold District Local Plan will be the key planning policy document for the District and will guide decisions on the use and development of land.</p>
<b>Timescale</b>	To 2041
<b>Area covered by the plan</b>	Cotswold District ( <b>Figure 1.1</b> )
<b>Summary of content</b>	<p>The adopted Local Plan set out the strategic vision, objectives and development strategy for the District, as well as the planning policies which help to determine the future location, scale, type and design of new development in Cotswold.</p> <p>To give effect to new Cotswold District Council strategies, such as the Economic Recovery Strategy, the Climate and Ecological Emergency Action Plans and the Renewable Energy Strategy, and to reflect the Council's commitment to make the Local Plan 'Green to the Core', the policies of the adopted plan will be revisited where appropriate. This will also take place in light of a need to further consider development needs / requirements between 2026 to 2041.</p>
<b>Plan contact point</b>	<p>Joanne Corbett, Senior Planning Policy Officer, Trinity Road, Cirencester GL7 1PX</p> <p>Email address: <a href="mailto:local.plan@cotswold.gov.uk">local.plan@cotswold.gov.uk</a></p>

## Current stage of plan making

- 1.8 At the current stage of plan making, Cotswold District Council are consulting on 'Preferred Options' for the Local Plan Update (*the Local Plan Update Consultation*). The document is an interim stage in developing the Local Plan Update and has been prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012).
- 1.9 The *Local Plan Update Consultation* document contains a summary of:
- the proposed Local Plan policy updates;
  - development strategy options for the period up to 2041, as well as a preferred development strategy and broad locations for future growth; and
  - a Call for Sites to deliver different types of potential development needs up to 2041, such as market housing, Affordable Housing, employment and commercial development.
- 1.10 This is accompanied in separate documents by an overview of the technical updates to the Local Plan vision, options and policies and a topic paper on the development strategy options.
- 1.11 The *Local Plan Update Consultation* follows the release of an initial 'Issues and Options' document for the Local Plan Update in 2022. The aim of the Issues and Options consultation was to gain stakeholders' views on the approach Local Plan Update policies can take on various key planning issues for the District.
- 1.12 The current consultation precedes the release of the pre-submission version of the Local Plan for Regulation 19 consultation later in 2024. Drawing on consultation responses received at the current stage of plan-making and evidence base studies undertaken to inform the Local Plan Update, this document will develop further the proposed updates for the Local Plan, including relating to the development strategy and allocations to 2041.

## 2. Integrated Impact Assessment for the Cotswold District Local Plan Update

### IIA explained

- 2.1 Integrated Impact Assessment (IIA) fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and discharges the duties for Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).
- 2.2 IIA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of IIA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the IIA for the Local Plan Update seeks to maximise the developing plan's contribution to sustainable development and the quality of life of residents.
- 2.3 The approach is to fully integrate these components and issues to provide a single assessment process to inform the development of the Local Plan Update. A description of each of the various components and their purpose is provided below.

### Sustainability Appraisal (SA)

- 2.4 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). It also widens the scope of the assessment from focusing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans.
- 2.5 The National Planning Policy Guidance (NPPG) states that the role of SA is “...to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.”<sup>2</sup>
- 2.6 Two key procedural requirements of the SEA Regulations are that:
  - When deciding on ‘the scope and level of detail of the information’ which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
  - A report (the ‘SA Report’) is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses ‘likely significant effects’ that would result from plan implementation) and reasonable alternatives.

### Equalities Impact Assessment (EqIA)

- 2.7 As a public sector organisation, Cotswold District Council has a duty under the Equality Act 2010<sup>3</sup> and the associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the District eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and

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<sup>2</sup> National Planning Practice Guidance. Paragraph: 001 Reference ID: 11-001-20190722

<sup>3</sup> Equality Act 2010 [online] available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents>



fostering good relations between those with a protected characteristics<sup>4</sup> and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

2.8 The Equality Act 2010 legally protects people from discrimination both in the workplace and in wider society. It replaces previous anti-discrimination laws which include the Sex Discrimination Act 1975, Race Relations Act 1976 and the Disability Discrimination Act 1995. The Act ensures that individuals with certain 'protected characteristics' are not indirectly or directly discriminated against. The protected characteristics include:

- **Age:** this refers to persons defined by either a particular age or a range of ages;
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities;
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Marriage and civil partnership:** marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples;
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Gender:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
- **Socio-economic status:** a person's socio-economic status referring to combined economic and sociological measure of a person's work experience and economic and social position in relation to others, based on income, education, and occupation.

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<sup>4</sup> Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

## Health Impact Assessment (HIA)

- 2.9 There are numerous links between planning and health highlighted throughout the NPPF. Paragraph 92 of the NPPF states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities and the NPPG states that Local Planning Authorities should ensure that health and wellbeing, and health infrastructure are considered in Local Plans and in planning decision-making.<sup>5</sup>
- 2.10 In this context, a Health Impact Assessment (HIA) is a tool used to identify and assess the potential impacts of a plan and inform decision-making.

## Integrated Impact Assessment

- 2.11 As previously explained, the IIA seeks to fulfil the requirement for SA and addresses the duty to undertake an EqlA and HIA. The approach is to fully integrate these to provide a single assessment process to inform the development of the LPU.
- 2.12 The following figure highlights the stages of the IIA.

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<sup>5</sup> National Planning Practice Guidance. Paragraph: 001 Reference ID: 53-001-20140722 [online] available at: <https://www.gov.uk/guidance/health-and-wellbeing>

# IIA process to support the Cotswold Local Plan Update

## Stage 1: Scoping Report

- Establish the context and baseline for the IIA
- Identify key sustainability issues for the Local Plan Update
- Develop the IIA Framework

## Stage 2: Interim IIA Report(s)

- Develop and refine alternatives for the Local Plan Update
- Appraise the significant effects of the alternatives
- Interim IIA Report(s)

## Stage 3: Consult on Local Plan Update & IIA Report

- Appraise the draft Local Plan Update
- Prepare the IIA Report for Regulation 19 consultation
- Consult on the Local Plan Update

## Stage 4: IIA Report Addendum

- Submission and examination
- Appraisal of modifications

## Stage 5: IIA Adoption Statement

- Prepare the IIA Adoption Statement
- Monitor the significant effects of the Local Plan Update

Figure 2.1: Stages of the IIA process

## This Interim IIA Report

- 2.13 This Interim IIA Report comprises part of Stage 2 in the figure above. At the current stage of plan-making, Cotswold District Council is not consulting on a full draft plan. Rather, the Council is consulting on an interim 'Preferred Options' document (*'the Local Plan Update Consultation'*) setting out preferred approaches for updates to the Local Plan policies.
- 2.14 This Interim IIA Report has therefore been produced voluntarily with the intention of informing the current stage of preparation of the Local Plan Update. Specifically, this report presents an appraisal of:
- The environmental constraints present in the potential locations for growth around the main settlements of the District;
  - A range of development strategy options for the District; and
  - the potential updates to the Local Plan policies.
- 2.15 This is for the benefit of those who might wish to make representations through the consultation and for the benefit of the plan-makers tasked with refining preferred approaches for the Local Plan Update.
- 2.16 Subsequent stages of the IIA process will consider more detailed development strategy options for the Local Plan update, including through an assessment of alternatives associated with housing numbers and spatial strategies. The findings of these assessments will be presented in an IIA Report accompanying Regulation 19 consultation on the pre-submission version of the Local Plan Update.
- 2.17 The next steps for the Local Plan Update's development and accompanying IIA process are discussed in more detail in **Chapter 8**.

## What is the scope of the appraisal?

### IIA Scoping Report

- 2.18 The SEA Regulations require that: "*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>6</sup> These authorities were consulted on the scope of the Local Plan Update IIA in late 2020.
- 2.19 The baseline information (including baseline data and context review) initially included in the Scoping Report has been updated in the period since and provides the basis for the IIA process. The responses (along with comments on how these have been considered and addressed through the IIA process) will be presented in the IIA Report which will accompany the pre-submission draft Local Plan at Regulation 19 consultation later in 2024.
- 2.20 Drawing on the review of the sustainability context and baseline, the Scoping Report identified a range of sustainability issues that should be a particular focus of IIA,

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<sup>6</sup> In line with Article 6(3) of the SEA Directive, these consultation bodies were selected because "*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme*".

ensuring it remains targeted on the most important issues. These issues were then translated into an IIA ‘framework’ of objectives and appraisal questions.<sup>7</sup>

2.21 The IIA Framework provides a way in which the sustainability effects of the Local Plan Update and alternatives can be identified and subsequently analysed based on a structured and consistent approach.

2.22 The IIA Framework and the appraisal findings in this Interim IIA Report have been presented under eleven IIA themes, reflecting the range of information being considered through the IIA process. These are:

- Healthy and Vital Communities
- Housing
- Economy and Employment
- Equalities
- Transport and Air Quality
- Climate Change
- Historic Environment
- Landscape
- Green Infrastructure and Natural Capital
- Biodiversity
- Land, Soil and Water Resources

2.23 The IIA Framework is presented in **Table 2.1** below.

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<sup>7</sup> The SA Framework initially presented in the SA Scoping Report has been updated and expanded in to an IIA Framework to 1) take into account consultation responses received on scoping and 2) to reflect the expansion of the SA process into an IIA process incorporating HIA and equalities considerations..

**Table 2.1: Cotswold Local Plan Update IIA Framework**

IIA theme	IIA Objective	Appraisal questions: Will the option/proposal help to...
<b>1. Healthy and Vital Communities</b>	Contribute to the achievement of balanced and healthy communities and be responsive to the needs of different age groups in the District.	<ul style="list-style-type: none"> <li>– enable and encourage younger people to live and work in the District?</li> <li>– enable older people to live close to facilities, services and other people?</li> <li>– tackle social and functional isolation by making provision for interaction such as safe and accessible spaces, parks, community hubs?</li> <li>– provide essential community services and facilities including healthcare, Green Infrastructure and allotments?</li> <li>– enable “lifetime homes”?</li> <li>– increase physical activity, reduce obesity and improve mental health and wellbeing through the design and layout of schemes, provision of facilities for sport and recreation?</li> <li>– improve access to the countryside for recreation?</li> <li>– provide mixed use, mixed housing type and mixed tenure developments?</li> <li>– enable access to further education/training opportunities?</li> </ul>
<b>2. Housing</b>	Meet local need for housing by maintaining a sustainable level of supply and ensure that new housing is as sustainable as possible in terms of its location, construction materials and internal and external facilities.	<ul style="list-style-type: none"> <li>– improve housing affordability?</li> <li>– provide sufficient affordable housing for those who need it?</li> <li>– be appropriately located having regard to facilities, services and environmental quality?</li> <li>– reduce the number of second homes delivered on new developments?</li> <li>– provide energy efficient homes?</li> <li>– provide housing that is designed and constructed sustainably, using where feasible recycled or recovered materials?</li> <li>– retrofit sustainable infrastructure, where possible?</li> <li>– provide good garden/light standards?</li> </ul>

IIA theme	IIA Objective	Appraisal questions: Will the option/proposal help to...
<b>3. Economy and Employment</b>	<p>Achieve sustainable economic growth and opportunities for employment, including support for the rural economy.</p> <p>Support the resilience and vitality of town centres during transformation from the “traditional” retail-dominated high street to a more flexible and responsive model.</p>	<ul style="list-style-type: none"> <li>– encourage the retention and/or growth of existing businesses?</li> <li>– provide accessible jobs?</li> <li>– provide live/work units and workspace for locally appropriate businesses?</li> <li>– provide sites for business and employment within communities?</li> <li>– encourage the use of local services and purchasing of local products?</li> <li>– ensure housing is delivered which can attract workers?</li> <li>– contribute to supporting the rural economy particularly though retaining or increasing the number of people employed in agriculture and tourism?</li> <li>– support the roll out of high speed broadband?</li> <li>– contribute to a low carbon economy?</li> <li>– encourage larger businesses to locate in the District?</li> <li>– encourage a range of jobs and premises and in particular increase the number of people employed in emerging economic sectors?</li> <li>– support vitality and viability of existing town centres by helping them to be more flexible and responsive to change?</li> </ul>
	<p>Encourage and support the development of sustainable tourism.</p>	<ul style="list-style-type: none"> <li>– seek to avoid environmental damage e.g. erosion caused by increased visitor numbers?</li> <li>– support the visitor economy?</li> </ul>
<b>4. Equalities</b>	<p>Advance equality for all.</p>	<ul style="list-style-type: none"> <li>– Promote access for all including those with and without shared protected characteristics?</li> <li>– Provide opportunities to foster good relations between groups?</li> </ul>
<b>5. Transport and Air Quality</b>	<p>Reduce the need to travel by private car, reduce traffic congestion and air pollution through improving travel choice by active encouragement of modal shift and facilitation of more sustainable forms of transport.</p>	<ul style="list-style-type: none"> <li>– reduce the need to travel?</li> <li>– encourage modal shift, particularly in respect of journeys to work, through walking, cycling and use of public transport?</li> <li>– promote sustainable and active travel for all residents including the needs of specific groups and the infrastructure required to support that?</li> <li>– prevent the exacerbation of air pollution in areas susceptible to poor air quality?</li> </ul>

IIA theme	IIA Objective	Appraisal questions: Will the option/proposal help to...
<b>6. Climate Change</b>	Take an active role in achieving net zero carbon by 2050 if not before.	<ul style="list-style-type: none"> <li>- encourage measures to reduce carbon emissions?</li> <li>- encourage/enable improvements to the energy efficiency of the District's existing building stock?</li> <li>- increase energy efficiency and reduce greenhouse gas emissions?</li> <li>- increase the generation and use of renewable energy?</li> <li>- address the negative impact of climate change, go beyond mitigation to achieve carbon neutral development?</li> <li>- minimise the need to travel by unsustainable means?</li> <li>- adjust to future needs through being flexible and adaptive to the effects of climate change (heat, drought, extreme weather)?</li> <li>- ensure that development takes place in accordance with the Strategic Flood Risk Assessment, Water Cycle Study and sequential test for flood risk, taking into account the likely effects of climate change?</li> </ul>
	Ensure adaptability to climate change that, where feasible, goes beyond simple limitation of negative effects.	<ul style="list-style-type: none"> <li>- reduce vulnerability to climate change impacts?</li> <li>- reduce flood risk, manage run-off sustainably and ensure the direct or indirect risk of flooding on site or downstream of the site is not increased by the development?</li> <li>- ensure that development takes place in accordance with the Strategic Flood Risk Assessment, Water Cycle Study and sequential test for flood risk, taking into account the likely effects of climate change?</li> </ul>
<b>7. Historic Environment</b>	Conserve and enhance the historic environment of the District.	<ul style="list-style-type: none"> <li>- conserve and enhance the historic environment?</li> <li>- protect the historic settlement pattern and distinctive character of the towns and villages of the District?</li> <li>- ensure beneficial use and long-term management of heritage assets?</li> <li>- ensure that historic environment is used as a key driver and focus for inward investment regeneration and redevelopment, particularly within our historic market towns?</li> <li>- increase public awareness of the historic environment?</li> </ul>
	Deliver high quality and well-designed sustainable development that responds appropriately to its context.	<ul style="list-style-type: none"> <li>- be sustainably and sympathetically designed having regard to its context?</li> <li>- respond appropriately to its context though being supported by a detailed characterisation study?</li> </ul>
<b>8. Landscape</b>	Conserve, restore and enhance the character of landscapes in the District.	<ul style="list-style-type: none"> <li>- conserve, restore and enhance the landscape (character, appearance and quality) of the District, including landscape assets, trees, setting of settlements?</li> <li>- maintain the tranquillity of the District, including the protection and promotion of Dark Skies?</li> <li>- support the integrity of the Cotswolds Area of Outstanding Natural Beauty?</li> </ul>



IIA theme	IIA Objective	Appraisal questions: Will the option/proposal help to...
<b>9. Green Infrastructure and Natural Capital</b>	Conserve and enhance green infrastructure assets and networks and exploit its multi-functional benefits.	<ul style="list-style-type: none"> <li>– deliver the Council’s GI Strategy?</li> <li>– maximise multiple benefits provided by GI?</li> <li>– link and enhance existing GI assets and networks?</li> </ul>
	Deliver natural capital and enhance the provision of ecosystem services.	<ul style="list-style-type: none"> <li>– take a natural capital approach to growth by providing a strategic framework for delivery of growth to...                             <ul style="list-style-type: none"> <li>○ identify the most beneficial locations for tree planting?</li> <li>○ assess how development projects can best contribute to natural capital locally?</li> <li>○ identify blue/green infrastructure opportunities?</li> </ul> </li> </ul>
<b>10. Biodiversity</b>	Protect and enhance biodiversity.	<ul style="list-style-type: none"> <li>– protect and enhance semi-natural habitats, priority habitats and the habitats of priority species?</li> <li>– reduce habitat fragmentation and support nature networks and landscape scale enhancements?</li> <li>– provide net gain?</li> <li>– increase public awareness of biodiversity?</li> <li>– secure long-term management of biodiversity and sites?</li> <li>– protect and enhance features of geodiversity interest?</li> </ul>
<b>11. Land, Soil and Water Resources</b>	Support the efficient use of land.	<ul style="list-style-type: none"> <li>– avoid development on the best and most versatile agricultural land?</li> <li>– increase the percentage of development on previously developed land?</li> <li>– promote remediation of contaminated land?</li> </ul>
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<ul style="list-style-type: none"> <li>– enable and promote reuse, recycling and reduction of waste generated in the District?</li> <li>– encourage local community recycling, reuse and minimisation of waste in new developments?</li> </ul>
	Encourage the prudent use of natural resources.	<ul style="list-style-type: none"> <li>– avoid sterilisation of identified mineral resource areas?</li> </ul>
	Protect and enhance water quality and minimise water use.	<ul style="list-style-type: none"> <li>– protect groundwater and surface water quality?</li> <li>– ensure that development is supported by adequate water supply and drainage?</li> <li>– reduce per capita water consumption through the use of rainwater recycling, grey water reuse or other methods?</li> </ul>

## 3. Plan making and IIA process to date

- 3.1 The Local Plan Update has been in development since early 2022, and has been informed by the IIA process.
- 3.2 A key element of the IIA process is the appraisal of 'reasonable alternatives' for the Local Plan. This is a central requirement of the SEA Regulations.
- 3.3 The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the IIA Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.  
*the plan*'.
- 3.4 A main focus of reasonable alternatives development and assessment to date has been with respect to the policy approaches that can be taken by the Local Plan Update and the Local Plan's development strategy.
- 3.5 The following chapters therefore describe how the IIA process to date has informed the Local Plan Update, including in terms of the development of its planning policies, and potential locations for additional development that may be taken forward through the Local Plan Update in the period to 2041.
- 3.6 Specifically, they present an overview of the following:
  - **IIA work to support Issues and Options:** An appraisal of a series of high-level approaches and alternatives for the Local Plan Update.
  - **Points of the compass appraisal:** An analysis of the environmental constraints present in the vicinity of the 18 main settlements in the district.
  - **Assessment of development strategy options:** An assessment of different growth strategies for the district.
- 3.7 An overview of further reasonable alternatives work that will be undertaken prior to Regulation 19 consultation on the pre-submission version of the Local Plan Update is also provided in **Chapter 0**.

## 4. Issues and Options (January 2022)

### Regulation 18 Issues and Options Consultation

- 4.1 In January 2022, consultation was undertaken on an Issues and Options document for the Local Plan Update.<sup>8</sup> The Issues and Options document was the key output of the initial stage in developing the updates and was prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012.
- 4.2 The aim of the public consultation was to gain stakeholders' views on a range of planning issues. These included relating to the following topics:
- Responding to the Climate Crisis
  - Accessibility of New Housing Development
  - Biodiversity
  - Design
  - Economy and Employment
  - Green Infrastructure
  - Health, Social and Cultural Wellbeing
  - Historic Environment
  - Housing Affordability
  - Housing Need, Requirement, Land Supply and Delivery
  - Infrastructure
  - Landscape
  - Natural Capital and Ecosystem Services
  - Neighbourhood Development Plans
  - Retail and Town Centres
  - Sustainable Tourism
  - Sustainable Transport and Air Quality
  - Water Quality, Water Resources and Flooding
- 4.3 For each of these topics, a Topic Paper was prepared, designed to inform the consultation.

### IIA work to accompany Issues and Options

- 4.4 To support the Issues and Options stage, an Interim IIA Report<sup>9</sup> was produced voluntarily with the intention of informing this stage of preparation of the Local Plan Update. Specifically, the Interim IIA Report presented an appraisal of a series of high-level approaches and alternatives (hereafter referred to as "options") which were evaluated as part of plan development. This was for the benefit of plan-makers tasked

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<sup>8</sup> Cotswold District Council (January 2022) Cotswold District Local Plan 2011 – 2031 (2021 Update): Regulation 18 Issues and Options Consultation

<sup>9</sup> AECOM (January 2022) Integrated Impact Assessment (IIA) for the Cotswold District Local Plan Update: Interim IIA Report to accompany Issues and Options consultation

with developing the updates for the Local Plan and for consideration alongside the representations received during the consultation.

4.5 The sets of options considered through the IIA were as follows:

- Biodiversity
- Zero carbon development
- Carbon storage calculations
- Accessibility
- Renewable energy provision outside of the AONB
- Renewable energy provision inside of the AONB
- Economy and employment
- Second homes and holiday homes
- Tourism

4.6 Each option was considered against the IIA Framework of objectives and assessment questions developed at scoping (**Table 2.1**).

4.7 Presenting the appraisal of these options, the following information was presented in the Interim IIA Report:

- A description of the options appraised;
- An overview of the likely significant positive and negative effects of each option; and
- A ranking of the sustainability performance of each option relating to each IIA theme to highlight their relative sustainability merits.

4.8 The Interim IIA Report which accompanied the Issues and Options Consultation can be accessed at the following location:

<https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/>

## 5. Points of the compass appraisal

- 5.1 As discussed in **Chapter 1**, whilst the adopted Local Plan is delivering on its adopted housing requirements and current needs, Cotswold District Council is taking the opportunity to consider development needs and development strategy options beyond the current Local Plan period.
- 5.2 In response to this, Cotswold District Council is considering development needs up to 2041 and options for how these may be delivered.
- 5.3 To support this process, a 'points of the compass' analysis of the 18 main settlements in Cotswold District has been undertaken. This is with a view to evaluating the relative sustainability merits of promoting development at various broad locations in the vicinity of each of the settlements and to facilitate the consideration of potential locations for longer term site allocations.
- 5.4 A number of broad areas around main settlements in the District have been evaluated, with a view to establishing the likely environmental and physical constraints to development in each area. The purpose of this analysis is to aid the consideration of appropriate locations for growth to be taken forward through the Local Plan Update.
- 5.5 Loosely reflecting the various 'points of the compass', these broad areas consider potential locations for development in the vicinity of the following settlements:
- Andoversford
  - Blockley
  - Bourton-on-the-Water
  - Chipping Campden
  - Cirencester
  - Down Ampney
  - Fairford
  - Kemble
  - Lechlade
  - Mickleton
  - Moreton-in-Marsh
  - Northleach
  - Siddington
  - South Cerney
  - Stow-on-the-Wold
  - Tetbury
  - Upper Rissington
  - Willersey
- 5.6 The analysis evaluates the key environmental constraints present in each of the broad areas proposed, including related to:
- biodiversity

- flood risk
- the historic environment
- landscape quality
- water
- agricultural land quality.

5.7 The Points of the Compass Appraisal is presented in the **Technical Annex** accompanying this IIA Report.

## 6. Appraisal of development strategy options

### Development strategy options

- 6.1 As part of the update process for the Local Plan, a number of options for the District's development strategy to 2041 are being considered. This is in light of changes to objectively assessed housing needs, site availability, changes to the National Planning Policy Framework and other factors.
- 6.2 To accompany the current consultation on the Local Plan Update, a Vision, Objectives and Development Strategy Options Topic Paper has been prepared. As discussed in the Topic Paper, there is a need to consider the amount of additional development that would be needed in the District if the Local Plan period was extended to 2041. This would enable the Local Plan to look ahead over a 15 year period from the base date of 1 April 2026.
- 6.3 In this respect around 5,150 dwellings' worth of housing land supply has already been identified for the extended Local Plan period. This leaves a gap of around 2,250 further dwellings to meet the housing need for the plan period, or around 1,180 dwellings if past over-delivery is deducted from the number needed to be planned for.
- 6.4 To meet this additional need for the extended Local Plan period, a number of development strategy options are under consideration by the Local Plan team. These are discussed below.

### Options assessed

- 6.5 An overview of the development strategy options is presented below.

#### *Option 1: Additional non-strategic site allocations*

- 6.6 Option 1 would roll forward the adopted Local Plan development strategy of focussing the majority of additional growth at Principal Settlements, including allocating some sites outside existing development boundaries. The supporting evidence for identifying Principal Settlements would be updated. This may result in some settlements no longer being a Principal Settlement and / or other settlements becoming a Principal Settlement.

#### *Option 2: Main Service Centre focus*

- 6.7 Option 2 would involve focusing the vast majority of future development (beyond existing commitments) more specifically at the main service centres, namely:
- Cirencester
  - Bourton-on-the-Water
  - Chipping Campden
  - Fairford
  - Lechlade
  - Moreton-in-Marsh
  - Northleach
  - Stow-on-the-Wold

- Tetbury

- 6.8 Under this scenario, proportionately less development (beyond existing commitments) would then take place in Principal Settlements that are not the Main Service Centres. The Principal Settlements that are not the Main Service Centres would retain a development boundary, inside which the principle of development would continue to be supported. However, they would not receive any allocations for additional housing growth.

### **Option 3: Dispersed growth**

- 6.9 Option 3 would involve a more 'dispersed' approach to the future pattern of development so that instead of growth being steered mainly towards the District's Principal Settlements or Main Service Centres, it would be more evenly distributed across the District.
- 6.10 Whilst some additional growth would still take place in the Principal Settlements, there would be a much stronger emphasis on small to medium-scale development taking place in villages across the District. Adopting a more 'dispersed' approach to growth such as this would mean that more small and medium-size sites would need to be identified either through the Local Plan or through Neighbourhood Plans.

### **Option 4: Village clusters**

- 6.11 Like Option 3, Option 4 is based on a dispersed approach to the future pattern of growth but, instead of villages being treated separately, they would be considered collectively in small groups or 'clusters' based on the services, facilities, employment provision and transport accessibility they are able to cumulatively offer. Each village 'cluster' would then be the focus for an appropriate and proportionate amount of growth, potentially with site allocations made in the Local Plan.
- 6.12 The logic of this approach is rooted in the NPPF, which emphasises that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services and that where there are groups of smaller settlements, development in one village may support services in a village nearby.
- 6.13 This could apply to clusters of existing larger villages but it could also potentially apply to some smaller villages where the current Local Plan adopts a more restrictive approach to growth, particularly where these are close to other larger villages that offer a broader range of services and facilities.
- 6.14 The approach would not focus on the identification of land between villages for development. It would instead seek to identify land within or adjacent to existing settlements that form part of a village cluster. The more restrictive approach that currently applies to very small villages, hamlets and the open countryside would continue to apply.

### **Option 5: New settlement(s)**

- 6.15 This option would initiate the development of one or more new settlements in the District. The new settlement(s) would grow to include all the services, facilities, employment provision and accessibility standards found within a Main Service Centre. The size criteria of the new settlement and the potential location are yet to be determined, but it is unlikely such a new settlement would take place within the Cotswolds National Landscape.
- 6.16 Delivering a new settlement has a long lead in time from conception of the idea to the first spade being put in the ground. A new settlement would therefore also be expected to deliver housing towards the mid to end of the new Local Plan period and



would also likely continue delivering into the next Local Plan period. A new settlement may therefore form only part of the housing land supply solution.

### **Option 6: New strategic site(s)**

- 6.17 This option would deliver one or more new strategic sites at a Principal Settlement(s) at a level that meets Main Service Centre expectations. As with a new settlement, strategic sites have a long lead in time from conception of the idea to the first spade being put in the ground. A new strategic site would therefore be expected to deliver housing towards the mid to end of the new Local Plan period and, similar to the Chesterton strategic site, would likely continue delivering into the Local Plan period. This may therefore form only part of the housing land supply solution.
- 6.18 The potential location of such sites are yet to be determined, but it is unlikely that such allocations would take place within the Cotswolds National Landscape.

### **Option 7: Focus growth around transport nodes**

- 6.19 Under this final scenario, future growth (beyond existing commitments) would be focussed along key public transport corridors and around public transport hubs (e.g. rail stations).
- 6.20 In focusing development where the availability of public transport is good, people will be less likely to use their car, helping to reduce congestion and carbon emissions, particularly with increased electrification of our public transport services.
- 6.21 A public transport-focused scenario would see future additional growth focused in locations where there are good current and potential future opportunities to use public transport such as the A429 corridor and Moreton-in-Marsh in particular where there is also a railway station.

## **Approach to the appraisal of development strategy options**

- 6.22 To support the consideration of these development strategy options, the options have been appraised against the IIA Framework (**Table 2.1**).
- 6.23 In undertaking the appraisal, the proposed options were reviewed to determine the likelihood of positive or negative effects under each IIA theme.
- 6.24 Where a causal link between the options and IIA themes was established, impacts were identified on the basis of professional judgment with reference to the evidence base. The appraisal was undertaken with reference to the criteria in Schedule 1 of the SEA Regulations.
- 6.25 The following sections and appraisal tables therefore present the findings relating to these options.
- 6.26 The appraisal findings are presented relation to the seven development strategy options introduced above. These are organised by the eleven IIA themes and use the IIA Framework.
- 6.27 For each IIA theme, a commentary on the likely effects is presented, including significant effects. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '7' the least favourable ranking.

# Appraisal findings

## Healthy and Vital Communities

6.28 **Table 6.1** below sets out the appraisal findings concerning the Healthy and Vital Communities IIA theme.

**Table 6.1 Appraisal findings: Healthy and Vital Communities**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
<b>Rank</b>	=1	=1	7	6	5	4	3
<b>Likely significant effects?</b>	Yes - positive	Yes - positive	Yes - negative	Yes - mixed	Uncertain	Uncertain	Yes - positive

### Discussion

The Main Service Centres and Principal Settlements offer the broadest range of services and facilities in the district and are potentially well-placed to accommodate further growth. A focus of growth in these locations (as proposed through Option 1, Option 2, and Option 7) has the potential to support the longer-term sustainability and healthy place-shaping of key settlements in the district. For example, by supporting opportunities to rejuvenate and revitalise town centre environments and supporting growth in the most accessible and well-connected locations. This is particularly important for Cirencester, given its role and function as the key urban community in the district (and a hub for locations in surrounding areas).

Linked to the above, proposals for larger sites have the potential to generate developer contributions which could provide additional (or expand the existing) services and facilities, positively contributing to community vitality and wellbeing. In this respect, Option 5 and Option 6 also perform favourably for the Healthy and Vital Communities theme. Specifically, Option 5 would initiate the development of at least one new settlement in the district, with national policy recognising that careful consideration should be given to a number of factors such as infrastructure opportunities (existing or planned), size and location (ability to be self-supporting), and the quality of places (e.g. garden city principles). Option 6 has a focus on identifying strategic sites at a Principal Settlement at a level which would meet Main Service Centre expectations. However, it is recognised that the delivery of a new settlement or strategic site allocations have a relatively long lead-in time from conception to delivery. Therefore, the potential benefits of these options are only likely to be realised towards the end of or beyond the plan period.

A significant number of the villages are relatively poorly served by public transport, services, facilities, and employment opportunities. Therefore, options which allow for a proportion of future growth to take place in smaller settlements (as proposed through Option 3 and Option 4) have the potential to support their vitality and viability, whilst also enabling development sites to be locally identified (e.g. through Neighbourhood Plans). However, such an approach could cumulatively place strain on local infrastructure capacity. Option 4 encourages a dispersed approach via village 'clusters', based on the services, facilities, employment provision and transport accessibility they are able to cumulatively offer. Option 4 would therefore consider the 'collective' opportunities and advantages presented by settlements rather than treating each in isolation, facilitating development opportunities in locations where historically this may not have been possible. This coordinated approach to delivering growth may potentially enable the win-win opportunities to be realised for some of the smaller settlements within the district. This may include, for example, by providing the opportunity to create a well-designed, 'green to the core', sustainable and self-sustaining locations for new homes, jobs and supporting services and facilities. However, potential impacts are perhaps less significant in comparison to focusing growth at the key locations in the district.

### Conclusion

In conclusion, options which would facilitate a higher proportion of growth within Main Service Centres and Principal Settlements will help to support the vitality of key locations throughout the district. Option 1, Option 2, and Option 7 perform favourably with respect to the Healthy and Vital Communities theme in this respect.

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

Option 5 and Option 6 will encourage the delivery of larger sites which have the potential to facilitate additional (or expand the existing) services and facilities offered within the district. However, it is recognised that the delivery of a new settlement or strategic site allocations have a relatively long lead-in time from conception to delivery.

Options which allow for a proportion of future growth to take place in smaller settlements (as proposed through Option 3 and Option 4) have the potential to support their vitality and viability by helping to provide a balanced mix of sites and opportunities. However, these options would contribute less to supporting the longer-term sustainability and healthy place-shaping of key settlements in the district (i.e., at the Main Service Centres and Principal Settlements). This is given that a significant number of the villages are relatively poorly served by public transport, services, facilities, and employment opportunities.

## Housing

6.29 **Table 6.2** below sets out the appraisal findings concerning the Housing IIA theme.

**Table 6.2 Appraisal findings: Housing**

	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>	<b>Option 5</b>	<b>Option 6</b>	<b>Option 7</b>
<b>Rank</b>	<b>=1</b>	<b>3</b>	<b>7</b>	<b>6</b>	<b>5</b>	<b>4</b>	<b>=1</b>
<b>Likely significant effects?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>Yes - negative</b>	<b>Yes - mixed</b>	<b>Uncertain</b>	<b>Yes - positive</b>	<b>Yes - positive</b>

### Discussion

Many larger settlements (e.g. Cirencester, Tetbury and Moreton-in-Marsh) have already absorbed a large amount of housing growth in recent years and/or have future growth already committed. A continued focus on housing growth in these locations (as proposed through Option 1, Option 2, and Option 7) has the potential to put pressures on the capacity of existing services and facilities which would serve additional housing growth and therefore, it will be essential for new development areas to be accompanied by appropriate community infrastructure to meet needs (to support wellbeing). Pressures are perhaps more pronounced through Option 2, which would deliver proportionately more housing in the Main Service Centres in comparison to Principal Settlements.

Proportionately less development taking place in the smaller settlements would limit the opportunity to provide new homes in those locations, including affordable housing. However, small and medium-size sites which are likely to come forward through a more ‘dispersed’ approach to growth in the district (Option 3 and Option 4) are generally able to deliver new homes more swiftly in comparison to larger strategic sites. Additionally, this approach could offer a greater degree of local influence and control over new development (e.g., new sites brought forward through Neighbourhood Plans). Nonetheless, dispersing housing around the district may deliver higher levels of growth within the Cotswold National Landscape, where major development proposals are unlikely to come forward. This may contribute less towards meeting housing needs, given larger sites have the potential to deliver a range of housing types and tenures (including affordable homes).

The supply of large numbers of new homes can often be best achieved through planning for larger scale development such as new settlements or significant extensions to existing villages and towns. Option 5 and Option 6 perform favourably in this regard. However, the delivery of a new settlement or strategic sites is likely to have a long lead-in time from conception, given the complexities associated with identifying suitable locations, developing the design, and gaining the necessary consents for approval. In light of this, housing growth through Option 5 and Option 6 is likely to come forward towards the end of the plan period and would also likely continue delivering into the next Local Plan period. On this basis, taking forward Option 5 or Option 6 may only form part of the housing land supply solution during the current plan period to 2041.

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

**Conclusion**

In conclusion, options which would facilitate a higher proportion of new homes within Main Service Centres and Principal Settlements will help to deliver the greatest number of homes in the most accessible and sustainable locations within the district (as proposed through Option 1, Option 2, and Option 7). However, it will be important to ensure that new community infrastructure is delivered at these locations alongside housing.

Dispersing housing across the district may result in disproportionate growth in settlements, and this may not necessarily meet emerging housing needs (i.e., by delivering too few homes in the most sustainable locations). Additionally, as major development proposals are unlikely to come forward within the Cotswold National Landscape, Option 3 and Option 4 are less likely to deliver a range of housing types and tenures (including affordable homes).

Option 5 or Option 6 may only form part of the housing land supply solution during the current plan period to 2041, given the long lead-in time for delivering a new settlement or strategic sites. However, as these options will likely facilitate development of larger sites within proximity to Main Service Centres and Principal Settlements, these options are also relatively favourable with respect to the Housing IIA theme.

**Economy and Employment**

6.30 **Table 6.3** below sets out the appraisal findings concerning the Economy and Employment IIA theme.

**Table 6.3 Appraisal findings: Economy and Employment**

	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>	<b>Option 5</b>	<b>Option 6</b>	<b>Option 7</b>
<b>Rank</b>	<b>=1</b>	<b>=1</b>	<b>7</b>	<b>6</b>	<b>5</b>	<b>4</b>	<b>=1</b>
<b>Likely significant effects?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>Yes - mixed</b>	<b>Yes - mixed</b>	<b>Uncertain</b>	<b>Yes - positive</b>	<b>Yes - positive</b>

**Discussion**

Key challenges to supporting economic vitality in the district include (but is not limited to) the loss of employment land to housing, the under-delivery of employment land in mixed-use development, the need for flexible workspace, and the need to support the expansion of the green economy and economic diversification. In light of the above, options which would help to address some of the key challenges in the district perform more favourably with respect to the Economy and Employment IIA theme. This is considered below.

Many of the towns and villages in the district are within the boundaries of the Cotswold National Landscape. Growth through all options has the potential to strengthen the potential benefits of tourism for local communities, including in terms of employment and economic activities, and facilities such as shops which rely on the visitor economy. Potential benefits are perhaps more pronounced through options which would facilitate a greater proportion of growth in the Main Service Centres and Principal Settlements (Option 1 and Option 2), which serve as gateways to accessing the National Landscape. The Main Service Centres and Principal Settlements also offer the greatest variety of employment opportunities in the district. In this respect, focusing a higher proportion of growth in these locations may help to support a diverse mix of uses (essential in a post-pandemic context) which will help to strengthen the local economy and support the resilience of local centres.

Option 5 and Option 6 provides the opportunity to create significant new infrastructure investment, supporting the local economy through facilitating new jobs. With respect to Option 6, strategic sites may make use of and improve existing services, facilities, employment opportunities and transport connectivity within a Principal Settlement or Main Service Centre, further supporting economic vitality. Additionally, strategic scale development may help to support the regeneration of town centre environments and the resilience of the local economy (particularly important for Cirencester),

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

enabling a proportion of developer contributions to support the delivery of new services, facilities, and cultural opportunities due to increased use of town centre environments.

A public transport-focused scenario through Option 7 would encourage additional growth in locations where there are good current and potential future opportunities to connect to bus and rail networks. This may include locations within proximity to the A429 corridor (e.g., Cirencester, Kemble, Northleach, Bourton-on-the-Water, Stow-on-the-Wold, and Moreton-in-Marsh), and in locations which are connected to the rail network (Moreton-in-Marsh, and Kemble). This will help to ensure that people have access to employment and economic opportunities at key locations across the district.

**Conclusion**

In conclusion, Option 1, Option 2, and Option 7 will help support the vitality and viability of town and village centres as places that support a diversity of activities and uses, and also reduce the need to travel to access economic opportunities in the district. This is particularly important for Cirencester, given its role and function as the key urban community in the district (and a hub for locations in neighbouring authority areas).

Option 3 and Option 4 would deliver the least amount of growth within the key settlements in the district. However, supporting the economic vitality and resilience of these communities (many of which are located in the Cotswold National Landscape and important visitor destinations) is identified as a priority during the plan period.

**Equalities**

6.31 **Table 6.4** below sets out the appraisal findings concerning the Equalities IIA theme.

**Table 6.4 Appraisal findings: Equalities**

	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>	<b>Option 5</b>	<b>Option 6</b>	<b>Option 7</b>
<b>Rank</b>	<b>=1</b>	<b>=1</b>	<b>6</b>	<b>5</b>	<b>7</b>	<b>4</b>	<b>3</b>
<b>Likely significant effects?</b>	<b>Yes - positive</b>	<b>Yes - positive</b>	<b>Yes - negative</b>	<b>Yes - mixed</b>	<b>Uncertain</b>	<b>Yes - positive</b>	<b>Yes - positive</b>

**Discussion**

Accessibility to services and facilities is a key determinant of residents' quality of life. In this respect, delivering growth within proximity to Main Service Centres and Principal Settlements (as proposed through Option 1, Option 2, and Option 6) will help to promote access for all, including those with and without shared protected characteristics.

It is recognised that focusing growth around key transport hubs within the district (Option 7) will help to deliver the highest proportion of growth within the most sustainable locations in the district in terms of accessibility to services and facilities and connectivity to public transport networks. However, this may have unintended consequences in terms of rural connectivity and accessibility, widening inequalities in this respect by exacerbating social and community isolation. This is given that a significant number of the smaller villages in the district (which would be a focus of growth through Option 3 and Option 4) are relatively poorly served by public transport, services, facilities, and employment opportunities.

Option 4 seeks to identify village 'clusters' by considering the 'collective' opportunities and advantages presented by settlements rather than treating each in isolation. This is likely to bring forward some development opportunities in locations where this has not previously been possible, which has the potential to increase community cohesion and inclusivity.

The potential benefits of a new settlement are significantly influenced by a number of factors. For example, ensuring that new development is of high quality and sustainable design, is appropriately located, provides attractive and inclusive environments, and helps to support positive health

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

outcomes which help to address inequalities. In the absence of any potential locations at this stage, impacts with respect to Option 5 are uncertain.

**Conclusion**

In conclusion, options which deliver growth within the most sustainable locations in the district in terms of accessibility to services and facilities and connectivity to public transport networks have the greatest potential to support residents' quality of life, including groups who have protected characteristics. In light of this, Option 1, Option 2, Option 6, and Option 7 perform favourably with respect to the Equalities IIA theme.

## Transport and Air Quality

6.32 **Table 6.5** below sets out the appraisal findings concerning the Transport and Air Quality IIA theme.

**Table 6.5 Appraisal findings: Transport and Air Quality**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
<b>Rank</b>	=2	=2	7	6	5	=2	1
<b>Likely significant effects?</b>	Yes - positive	Yes - positive	Yes - negative	Yes - mixed	Uncertain	Yes - positive	Yes - positive

**Discussion**

A focus on growth within Principal Settlements and Main Service Centres (as proposed through Option 1 and Option 2) will help to facilitate new homes in the most sustainable locations in terms of access and connectivity to public transport networks in the district. By focusing development where the availability of public transport is good, people will be less likely to use their car, helping to reduce congestion and carbon emissions, particularly in light of an expected uptake and increase in the electrification of public transport services. This has the potential to deliver medium to longer term benefits for transport and air quality during the plan period. Potential benefits of delivering growth in the most sustainable locations are perhaps more pronounced through Option 7, which seeks to deliver a higher proportion of growth within Moreton-in-Marsh and Kemble. These are the two locations in the district which are connected to the rail network.

Focusing growth around key settlements and transport nodes may have unintended consequences in terms of rural connectivity and accessibility, reducing growth in smaller (more isolated) settlements. For example, bus services across most of the district, particularly in rural locations, are sporadic or non-existent. It is recognised that the ability of smaller settlements to absorb additional growth in a sustainable manner is more limited because people tend to need their cars more to access services and employment opportunities and other travel options are typically less available. However, a proportion of new development in these locations (as proposed through Option 3 and Option 4) may help to facilitate improvements.

As the Cotswold National Landscape covers most of the district, a new settlement (Option 5) would likely need to be located towards the southern and eastern boundaries of the district (outside of the National Landscape boundary). For example, on land surrounding Cirencester, South Cerney, Fairford, Lechlade, Kemble, or Moreton-in-Marsh. In light of this, Option 5 is also likely to facilitate growth in sustainable locations and may also facilitate opportunities to create significant new infrastructure investment (including public transport). However, impacts are uncertain at this stage as the potential locations for a new settlement have not yet been determined.

**Conclusion**

In conclusion, a focus on growth within Principal Settlements and Main Service Centres (as proposed through Option 1, Option 2, Option 6, and Option 7) will help to facilitate new homes in the most sustainable locations in terms of access and connectivity to public transport networks in the district. In particular, Option 7 has the potential to deliver the greatest proportion of growth in

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

locations with access to the rail network (i.e., Moreton-in-Marsh, and Kemble) and along sustainable transport corridors (such as the A429 corridor).

Whilst Option 3 and Option 4 are less favourable options with respect to the Transport and Air Quality theme, given that comparatively fewer homes would be delivered in the most accessible and sustainable locations in the district through these options, it is recognised that improving rural accessibility and connectivity is an important priority during the plan period.

## Climate Change

6.33 **Table 6.6** below sets out the appraisal findings concerning the Climate Change IIA theme.

**Table 6.6 Appraisal findings: Climate Change**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
<b>Rank</b>	=2	=2	7	6	5	=2	1
<b>Likely significant effects?</b>	Yes - positive	Yes - positive	Yes - negative	Yes - negative	Uncertain	Yes - positive	Yes - positive

### Discussion

The Council has declared a Climate Change Emergency and is committed to making its Local Plan "Green to the Core", on top of the legal and moral duty to address climate change. In this context, options which would help support the transition to net-zero and improve climate resilience perform more favourably with respect to the Climate Change theme. This is considered below.

With respect to climate change mitigation, road transport is an increasingly significant contributor to emissions in the district. Focusing growth within the Main Service Centres and Principal Settlements (as proposed through Option 1, Option 2, and Option 6) will help to facilitate growth in locations with established public transport networks. These locations also tend to be the locations with the widest range of services and facilities, which will help to limit the need to access amenities. This will help to support a limitation of emissions, positively contributing to climate change mitigation efforts.

By focusing growth around key public transport hubs within the district (such as Moreton-in-Marsh and Kemble), Option 7 would also help to encourage 'modal shift' away from the use of the private car and towards increased use of public transport. Potential benefits are perhaps more pronounced through Option 7, as this would also help to facilitate additional growth within proximity to the rail network and along the A429 corridor, where current and potential future opportunities to access public transport are more readily achievable.

Comparatively, dispersing growth around the district through Option 3 and Option 4 will potentially result in a higher percentage of new homes and employment land being delivered in less sustainable locations with respect to accessibility and connectivity to public transport networks. The ability of smaller settlements to absorb additional growth in a sustainable manner is more limited because people tend to need their cars more to access services and employment opportunities and other travel options are typically less available.

New development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. In terms of adapting to the effects of climate change, a development strategy which seeks to focus new homes and employment land in locations away from flood risk areas is an important consideration. Locations with potential sensitivities include:

- Flood risk issues within and/or surrounding the Main Service Centres include areas of Flood Zone 3a and 3b within Bourton-on-the-Water, Chichester, Chipping Campden, Fairford, Lechlade, Northleach, Stow-on-the-Wold, and Tetbury.

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

- Flood risk issues within and/or surrounding the Principal Settlements include areas of Flood Zone 3a and 3b within Andoversford, Blockley, Down Ampney, Kemble, Mickleton, Moreton-in-Marsh, and South Cerney.

Given the significant flood risks surrounding several of the Main Service Centres and Principal Settlements, dispersing growth around the district (through Option 3 and Option 4) may help to limit potential flood risk issues at these locations. However, these options would deliver comparatively fewer homes in the most sustainable locations in the district and contribute less towards meeting local and national climate change objectives.

It is useful to highlight that proposals for larger development areas (as proposed through Option 5 and Option 6) may offer opportunities to incorporate green infrastructure and sustainable drainage through design. Additionally, larger development areas may increase the viability of bringing forward wider infrastructure investment opportunities (such as public transport). While these options have the potential to proactively respond to the climate crisis, impacts associated with Option 5 are uncertain given that the potential location of a new settlement has yet to be determined.

**Conclusion**

In conclusion, Option 1, Option 2, Option 6, and Option 7 will help to limit reliance on private vehicles for undertaking day-to-day activities within the district and thus reduce transport related carbon emissions by offering more alternatives (public transport, walking and cycling) and good access to services and facilities. This is likely to encourage a greater emphasis on responding to the climate crisis, transitioning to a low carbon economy, and reducing transport carbon emissions.

In relation to climate change adaptation, it is acknowledged that all options will be directed by the need for sequential and exception testing, which should ultimately ensure that vulnerable development within flood risk areas is avoided. However, given the significant flood risks surrounding several of the Main Service Centres and Principal Settlements, dispersing growth around the district (through Option 3 and Option 4) may help to limit potential flood risk issues at these locations. However, is also recognised that the supporting policy framework for any of the options could ensure that suitable drainage strategies are included in development proposals. Although this is perhaps more likely through options which would facilitate the delivery of major developments, which have a requirement to include appropriate drainage solutions (as per the provisions of Paragraph 175 in the [NPPF](#)).

## Historic Environment

6.34 **Table 6.7** below sets out the appraisal findings concerning the Historic Environment IIA theme.

**Table 6.7 Appraisal findings: Historic Environment**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
<b>Rank</b>	?	?	?	?	?	?	?
<b>Likely significant effects?</b>	Yes - mixed	Yes - mixed	Yes - mixed	Yes - mixed	Uncertain	Yes – mixed	Yes - mixed

**Discussion**

The district has a rich heritage resource, recognised by the wealth of designated heritage assets and areas within the Main Service Centres, Principal Settlements, and wider Cotswold villages. For example, many of these settlements have at least one designated conservation area, scheduled monuments, and several listed buildings. Additionally, many are within proximity to a registered historic park and garden (including five of the Main Service Centres and one of the Principal Settlements).



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**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

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Cirencester is the largest Main Service Centre in the district with a rich heritage, recognised through its various designations of national and local significance. This includes over 170 listed buildings, nine scheduled monuments, four conservation areas, and Cirencester Park and Country House Historic Park and Garden. The significance of Cirencester in Roman times is recognisable through its Amphitheatre (the second largest in the UK) and walls (which circle the town)<sup>10</sup>.

Given the concentration of heritage assets and areas within the Main Service Centres and Principal Settlements, potential adverse impacts to the historic environment are likely if new development is brought forward in these areas (as proposed through Option 1, Option 2, Option 6, and Option 7). Potential impacts are perhaps more pronounced through Option 2, which would focus a greater proportion of growth within the Main Service Centres (including Cirencester).

The heritage and cultural significance of the smaller settlements in the district is likely to be significantly influenced by their location within the Cotswold National Landscape (which covers approximately 80% of the district). In this respect, dispersing growth across the district (as proposed through Option 3 and Option 4) also has the potential to impact on the historic environment of the smaller settlements (which is closely associated with the international tourism value of these locations). Nonetheless, dispersing growth across the district may help to reduce heritage impacts in the Main Service Centres and Principal Settlements.

It is important to recognise that the application of sensitive design through new development areas has the potential to positively contribute to the historic significance of these settlements (for example, via enhancing the setting of nearby heritage assets). For example, the design of new development areas (particularly larger or strategic-scale sites) may help to better reveal the heritage significance of key locations, which is an important contributor to the quality of the built-environment and the reasons why people choose to live within and visit the district. There may also be a number of brownfield sites within Main Service Centres and Principal Settlements which, in their current form, detract from the heritage significance of the settlement, and could therefore benefit from redevelopment which could help to rejuvenate these areas. For example, through incorporating sensitive architectural features which complement the heritage significance of these areas and their surrounding environment. Therefore, mixed impacts associated with Option 1, Option 2, Option 5, Option 6, and Option 7 are possible in the absence of specific site allocations at this stage (which have yet to be determined).

With respect to Option 5, by concentrating growth at a potential new settlement, this may help to ensure that new housing is located away from the most significantly constrained areas in terms of heritage (i.e., away from existing settlements). However, this depends on location, and a new settlement could possibly be situated in an area of historic environment sensitivity. It does not limit the potential for impacts on below-ground archaeological assets at the chosen location, or potential impacts on the setting of heritage assets in nearby settlements.

### **Conclusion**

With a wealth of heritage assets and areas within the district, all growth strategies (i.e., all options) are recognised for potential adverse effects to the historic environment. This is linked to the concentration of heritage assets and areas within the Main Service Centres, Principal Settlements, and wider Cotswold villages. However, it is important to recognise that the application of sensitive design through new development areas has the potential to positively contribute to the historic significance of these settlements (for example, via enhancing the setting of nearby heritage assets). On this basis, mixed impacts associated with Option 1, Option 2, Option 3, Option 4, Option 6, and Option 7 are possible in the absence of specific site allocations at this stage (which have yet to be determined). Consultation with Historic England is encouraged to ensure that development proposals seek to implement sensitive design which respects and enhances the setting of heritage assets and areas within the district.

Dispersing growth across the district (as proposed through Option 3 and Option 4) may help to reduce heritage impacts in the Main Service Centres and Principal Settlements. However, this may increase impacts on the rich historic environment of the district's smaller settlements. Whilst facilitating additional growth across all settlements within the district may help to better reveal their

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<sup>10</sup> Cotswold District Council (2024): 'Towards a Framework Masterplan SPD for Cirencester Town Centre', accessible [here](#)

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

heritage significance (for example, through regenerating brownfield sites and enhancing the public realm), the scale of growth may offset potential positive impacts.

It is anticipated that the stipulations within the Cotswold Design Code will guide new development proposals that may come forward during the plan period to respect their surroundings. This will benefit the historic environment by ensuring new development does not detract from the historic character of the area or the setting of heritage features, whilst also encouraging designs and layouts which reinforce the significance of the historic environment.

## Landscape

6.35 **Table 6.8** below sets out the appraisal findings concerning the Landscape IIA theme.

**Table 6.8 Appraisal findings: Landscape**

	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>	<b>Option 5</b>	<b>Option 6</b>	<b>Option 7</b>
<b>Rank</b>	<b>4</b>	<b>2</b>	<b>7</b>	<b>6</b>	<b>5</b>	<b>3</b>	<b>1</b>
<b>Likely significant effects?</b>	<b>Yes - negative</b>	<b>Yes - negative</b>	<b>Yes - negative</b>	<b>Yes - negative</b>	<b>Yes - negative</b>	<b>Yes - negative</b>	<b>Yes - negative</b>

### Discussion

Covering approximately 80% of the district, the Cotswold National Landscape is a significant constraint to growth during the plan period. In light of this, it is recognised that growth through all options has the potential to impact the integrity of the National Landscape. However, impacts are dependent on the scale, design and layout of new development areas which come forward.

The following settlements are wholly located within the National Landscape: Andoversford; Blockley; Bourton-on-the-Water; Chipping Campden; Northleach; Stow-on-the-Wold; Tetbury; and Upper Rissington. Settlements which are partially within the National Landscape include:

- Cirencester (northern half of the town, including a designated Special Landscape Area).
- Kemble (most of the land surrounding the settlement is within the National Landscape, although land to the south west is outside of the boundaries).
- Mickleton (land to the south of the settlement is within the National Landscape, with land to the west, whilst outside of the National Landscape, designated as a Special Landscape Area).
- Moreton-in-Marsh (land to the west of the settlement is within the National Landscape, with land to the north and south, whilst outside of the National Landscape, designated as Special Landscape Areas).
- Willersey (southern half of the settlement is within the National Landscape, with the northern half of the settlement outside of the National Landscape).

With respect to the options, potential impacts on the National Landscape are perhaps more pronounced through Option 1 over Option 2, given the greater emphasis on growth in the Principal Settlements (of which, an increased number of these locations are within the boundaries of the National Landscape). It is recognised that some of the Main Service Centres have land available outside of the National Landscape. This is particularly evident for Moreton-in-Marsh and Kemble (although development opportunities are perhaps still constrained by the sensitive landscape that surrounds Kemble). As both settlements are identified as locations which are key public transport hubs (particularly for rail), Option 7 is likely to facilitate the greatest proportion of new homes in locations outside of the National Landscape. These locations are also more likely to be able to accommodate higher levels of growth, in landscape character terms, in comparison to smaller settlements (as proposed through Option 3 and Option 4). This is given that smaller settlements may have a relatively high landscape sensitivity in light of 1) their location within the National Landscape, and 2) their rural character and countryside setting. Additionally, Option 4 may lead to a

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

perception of loss of identity and distinctiveness between different settlements if growth is delivered via village ‘clusters’, negatively impacting local landscape and villagescape character.

For Option 5, as there is a presumption against major development taking place within the Cotswolds National Landscape other than in exceptional circumstances, the likelihood is that a new settlement would need to be located outside of this area to safeguard its integrity. As the National Landscape covers most of the district, under this presumption, any new settlement would need to be located towards the southern and eastern boundaries of the district (for example, on land surrounding Cirencester, South Cerney, Fairford, Lechlade, Kemble, or Moreton-in-Marsh). Whilst this may have benefits in terms of locating the new settlement near to existing Main Service Centres and Principal Settlements, this could lead to cumulative adverse impacts to landscape, villagescape and townscape character given the level of growth which has come forward at these locations during the current plan period.

**Conclusion**

It is recognised that growth through all options has the potential to impact the integrity of the Cotswold National Landscape. The Cotswold Design Code outlines that it is important that new development, whilst respecting local character, develops a sense of place in its own right alongside individuality of design and identity of character either for the whole development or with a larger scheme, also for areas within that development. However, the potential for significant negative effects is ultimately recognised at this stage under all options (pre-mitigation), though this will be better informed by consideration of precise development locations.

In conclusion, Option 7 is likely to facilitate the greatest proportion of new homes in locations outside of the National Landscape and is the most favourable option with respect to the Landscape IIA theme. Option 6 would likely deliver new development on larger sites which perhaps offer greater flexibility in terms of design by incorporating natural landscaping features and enhancements. However, this may lead to more significant concentrated effects on landscape character locally, given the scale of developments which would come forward through this option.

The Main Service Centres and Principal Settlements, whilst sensitive from a landscape perspective, are also likely to be able to accommodate higher levels of growth in comparison to the smaller settlements. A focus on growth through Option 3 and Option 4 would likely result in a greater proportion of major development proposals coming forward within the National Landscape, with significant adverse impacts to its special qualities and the rural character and setting of these smaller settlements. Given the impacts on this nationally designated landscape, Option 3 and Option 4 are less favourable options in relation to the Landscape IIA theme.

**Green Infrastructure and Natural Capital**

6.36 **Table 6.9** below sets out the appraisal findings concerning the Green Infrastructure and Natural Capital theme.

**Table 6.9 Appraisal findings: Green Infrastructure and Natural Capital**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
<b>Rank</b>	=3	=3	7	6	=1	=1	=3
<b>Likely significant effects?</b>	Yes - mixed	Yes - mixed	Uncertain	Uncertain	Yes - positive	Yes - positive	Yes - mixed

**Discussion**

Attractive and wildlife-rich green and blue spaces support the quality of neighbourhoods, often supporting a high-quality public realm and delivering wider benefits with respect to climate resilience and health and wellbeing. For example, green infrastructure enhancements have the potential to deliver a range of ecosystem services which will support land, soil, and water resources. These include soil formation; flood and erosion protection; and water quality regulation. The provision of

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**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

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green infrastructure within new developments can also support flood risk management through the provision of permeable surfaces and introduction of sustainable drainage systems.

In the context of the above, options which would focus growth on larger allocations (Option 5 and Option 6) may increase the potential to deliver multi-functional and interconnected green and blue infrastructure opportunities through design. Additionally, a focus of growth within Main Service Centres and Principal Settlements (Option 1, Option 2, Option 6, and Option 7) may also support opportunities to regenerate and enhance the environmental quality at key locations in the district, improve active travel links, and provide wider health benefits which complement the aims and objectives in the Council's Green Infrastructure Strategy<sup>11</sup>.

Cotswold Water Park is an important green and blue infrastructure asset within the district. Whilst the opportunities for delivering multi-functional green and blue infrastructure networks are perhaps more readily achievable through larger allocations, it will be important for new development areas to link with and enhance existing assets in the district where possible. With respect to the potential delivery of a new settlement through Option 5, a key presumption is that the location of any new settlements would be located outside of the National Landscape. As the Cotswold Water Park covers most of the land between Fairford and Lechlade (i.e., some of the only areas of the district which are outside of the National Landscape boundary), the delivery of a new settlement may offer opportunities to expand and enhance established green and blue infrastructure networks at key locations. Contrastingly, strategic scale development may adversely impact existing green and blue infrastructure networks by reducing their capacity to accommodate additional growth and visitors to these spaces. Impacts associated with Option 5 and Option 6 are therefore likely to be significantly influenced by the location, design, and layout of any proposals which come forward (which has not been determined at this stage).

The potential for smaller settlements (Option 3 and Option 4) to support opportunities for multi-functional green and blue infrastructure networks is limited by their location within the Cotswold National Landscape. This is given that strategic scale growth which could deliver significant green and blue infrastructure provision is less likely to take place within the National Landscape. However, it is recognised that green infrastructure benefits are likely to be required as a condition for any new development areas which come forward within the National Landscape.

### **Conclusion**

In conclusion, as larger sites offer the greatest potential to deliver multi-functional green and blue infrastructure networks, Option 5 and Option 6 perform most favourably. Numerous natural capital enhancements can be anticipated as a result, with the potential for significant positive effects in the long-term.

However, a focus of growth within Main Service Centres and Principal Settlements (as proposed through Option 1, Option 2, and Option 7) also has the potential to support opportunities to regenerate and enhance the environmental quality at key locations in the district. Potential impacts will be dependent on the design of new development areas, including the extent to which schemes can link and expand existing green infrastructure networks at these locations.

Strategic scale growth which could deliver significant green and blue infrastructure provision is less likely to take place within the National Landscape. Nonetheless, opportunities to expand and enhance green and blue infrastructure networks within smaller settlements (Option 3 and Option 4) should be encouraged through the Local Plan wherever possible, with a view to supporting the quality of life and wellbeing of all residents in the district.

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<sup>11</sup> Cotswold District Council (2024): 'Green Infrastructure Strategy: Including Open Spaces and Play', accessible [here](#)

## Biodiversity

6.37 **Table 6.10** below sets out the appraisal findings concerning the Biodiversity IIA theme.

**Table 6.10 Appraisal findings: Biodiversity**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
<b>Rank</b>	<b>=3</b>	<b>=3</b>	<b>7</b>	<b>6</b>	<b>=1</b>	<b>=1</b>	<b>=3</b>
<b>Likely significant effects?</b>	<b>Yes - mixed</b>	<b>Yes - mixed</b>	<b>Yes – negative</b>	<b>Yes – negative</b>	<b>Uncertain</b>	<b>Yes – mixed</b>	<b>Yes - mixed</b>

### Discussion

There are no European designated sites within the district, with the nearest sites located directly to the south (North Meadow and Clattinger Farm SAC) and to the west (Cotswold Beechwoods SAC; and Rodborough Common SAC). The Severn Estuary Ramsar (and SPA) is located approximately 20km to the west of the district (at its nearest point). In light of this, it is currently not possible to distinguish between the options with respect to potential impacts to the integrity of European designated sites. A Habitats Regulations Assessment (HRA) is being undertaken in parallel to the IIA. The primary aim of HRA is to ensure the protection of sites that host habitats and species of European importance, exploring the likely significant effects of Local Plan Update proposals on European sites. This process is set out in Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') and the Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations')<sup>12</sup>. Irrespective of the preferred development strategy which is taken forward, it is anticipated that the Local Plan Update will appropriately incorporate any mitigation and/or enhancement measures for future development proposals as recommended through the HRA.

Regarding potential impacts to nationally designated sites, there are SSSIs located within proximity to four of the Main Service Centres (Bourton-on-the-Water; Fairford; Lechlade; and Tetbury) and two of the Principal Settlements (Kemble; and South Cerney). Therefore, growth in these locations will likely require consultation with Natural England to determine whether new development areas will have any significant impacts to the integrity of these sites. These options are perhaps the least favourable with respect to impacts to nationally designated sites, as these options seek to focus additional growth around settlements which have increased concentration of SSSIs in comparison to the rest of the district which, when combined with additional growth in these locations, has increased potential for significant effects related to these designated sites.

It is recognised that potential ecological impacts are dependent on the design and location of new development areas, which has not yet been determined. However, dispersing growth around the district may limit opportunities to deliver coordinated schemes at locations which have the greatest potential to deliver net gains for nature. For example, many of the smaller settlements (which would be a focus of growth through Option 3 and Option 4) are within the Cotswold National Landscape, where opportunities for significant growth are limited. This may reduce the viability of delivering significant ecological enhancements within the district. Comparatively, there might be a greater potential to deliver net gains for nature within the Main Service Centres and Principal Settlements as these locations are likely to facilitate growth at larger, potentially strategic-scale, sites. For example, larger developments can also offer opportunities to deliver landscape-scale biodiversity enhancement measures such as habitat creation and enhancements in ecological connections and networks. In light of this, mixed effects are likely with respect to Option 1, Option 2, and Option 7.

Dispersing growth around the district (Option 3 and Option 4) may limit opportunities to deliver coordinated schemes at locations which have the greatest potential to deliver net gains for nature. However, it is also important to recognise that the requirement to deliver at least 10% biodiversity net gain (BNG) on sites embedded by the Environment Act 2021 will help mitigate potential negative effects and facilitate enhancements to ecological networks.

In the Cotswold context, many species of conservation interest in the district are separated by large distances from other patches of suitable habitat which exceed their normal dispersion capabilities.

<sup>12</sup> The requirement for HRA is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2017.

**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

Creating a more inter-connected network of habitats allows species to expand their range, counteracting the ongoing trend for habitat fragmentation and adapting to the threats of climate change. In this respect, proposals for larger sites (likely through Option 5 and Option 6) have a greater potential to deliver net gains for nature. Specifically, proposals for larger sites have the potential to be designed to incorporate green infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity objectives. Potential benefits are influenced by the extent to which new development areas are designed to deliver measurable, proportionate, and appropriate biodiversity net gains in line with national and local policy.

**Conclusion**

In conclusion, proposals for larger sites (likely through Option 5 and Option 6) have a greater potential to deliver net gains for nature at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity objectives. However, as the location of a new settlement has yet to be determined, potential impacts are uncertain at this stage.

Whilst many of the Main Service Settlements and Principal Settlements contain (or are within proximity to) nationally designated SSSIs and locally important priority habitats, these locations may have additional opportunities to facilitate growth at larger, potentially strategic-scale, sites. Proposals for larger developments offer opportunities to deliver landscape-scale biodiversity enhancement measures such as habitat creation and enhancements in ecological connections and networks. In light of this, mixed effects are likely with respect to Option 1, Option 2, Option 6, and Option 7.

Dispersing growth around the district may limit opportunities to deliver coordinated schemes at locations which have the greatest potential to deliver net gains for nature. For example, many of the smaller settlements (which would be a focus of growth through Option 3 and Option 4) are within the Cotswold National Landscape, where opportunities for significant growth are limited. This may reduce the viability of delivering significant ecological enhancements within the district.

**Land, Soil and Water Resources**

6.38 **Table 6.11** below sets out the appraisal findings concerning the Land, Soil and Water Resources IIA theme.

**Table 6.11 Appraisal findings: Land, Soil and Water Resources**

	<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>	<b>Option 5</b>	<b>Option 6</b>	<b>Option 7</b>
<b>Rank</b>	<b>=2</b>	<b>=2</b>	<b>=6</b>	<b>=6</b>	<b>5</b>	<b>1</b>	<b>=2</b>
<b>Likely significant effects?</b>	<b>Yes - mixed</b>	<b>Yes - mixed</b>	<b>Yes - negative</b>	<b>Yes - negative</b>	<b>Uncertain</b>	<b>Yes - positive</b>	<b>Yes - mixed</b>

**Discussion**

Most of the Main Service Centres and Principal Settlements are surrounded by some areas of land which is considered as the best and most versatile land for agricultural purposes (e.g., Grade 1, Grade 2, and Grade 3a land). However, these settlements are also likely to have increased opportunities relating to the availability brownfield land. Therefore, opportunities to promote the most efficient reuse of land are most likely to be achieved through Option 1, Option 2, Option 6, and Option 7. Given the location of a potential new settlement under Option 5 is not determined, it is uncertain whether the delivery of a significant new settlement has the potential to take place on brownfield or greenfield land.

Water resources in the district include a network of main rivers, streams, and brooks, many of which pass through or surround the Main Service Centres and Principal Settlements. For example:

- The River Churn passes through Cirencester (and Siddington) and South Cerney,

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**Option 1   Option 2   Option 3   Option 4   Option 5   Option 6   Option 7**

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- The source of the River Thames is to the north of Kemble (at Thames Head), with the river itself passing to the north east of the settlement.
- The River Coln passes through Fairford, joining the River Thames at Lechlade. Cotswold Water Park (the UK's largest marl lake system) covers most of the land between Fairford and Lechlade (south of the A417).
- The River Thames and River Leach pass within proximity to Lechlade.
- The River Windrush, River Eye, and River Dikler pass through Bourton-on-the-Water. The River Dikler also passes through land to the west of Stow-on-the-Wold.
- The River Evenlode (a tributary of the River Thames) which passes through Moreton-in-Marsh.

In this respect, a focus of growth within the Principal Settlements and Main Service Centres may adversely impact the water resources outlined above. However, proposals for larger strategic-scale sites at these locations (as proposed through Option 6) may facilitate a greater potential for new development areas to incorporate green infrastructure buffers and other mitigation measures to limit (and manage effectively) potential run-off. This is dependent on the design of new development areas.

Comparatively, more dispersed growth throughout the district (as proposed through Option 3 and Option 4) may deliver a greater proportion of new development away from the water resources discussed above. However, there are likely to be fewer opportunities to deliver larger-scale site allocations at these locations, and fewer available brownfield sites to support the most efficient use of land. This may result in more greenfield land being lost to new development areas, increasing surface water run-off to nearby water resources.

### **Conclusion**

On balance, focusing growth within the Main Service Centres and Principal Settlements is likely to protect the open countryside from inappropriate levels of development. This will help support the capacity of the landscape and villagescape to regulate soil and water quality. For example, dispersing growth throughout the district through Option 3 and Option 4 may result in an increased amount of land take in proportion to needs, with fewer brownfield opportunities potentially available in these more rural locations.

In relation to this IIA theme, the design of new development areas is a key determinant on the success of the development strategy within the Local Plan. For example, in addition to encouraging the most efficient use of land in the district, it will be essential for new development areas to maximise water and energy efficiency, protect water resources and water quality, promoting the use of renewable energy sources and sustainable construction methods, and reducing pollution and waste.

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## 7. Assessment of proposed updates to the Local Plan

7.1 This chapter presents appraisal findings and recommendations in relation to the Local Plan Update Consultation document.

### Approach to the appraisal

- 7.2 The appraisal of the policies in the Local Plan Update Consultation document has been presented through the eleven IIA Themes.
- 7.3 Each theme begins with a brief summary of the conclusions in the adopted Local Plan's Sustainability Appraisal (2017).<sup>13</sup>
- 7.4 An appraisal is then undertaken for the updates to policies in the Local Plan Update Consultation document. In undertaking the appraisal, the proposed policies are reviewed to determine which are likely to have a positive or negative environmental effect.
- 7.5 Where likely significant effects have been identified, these are described in summary tables for each IIA Theme.
- 7.6 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the Local Plan document. The ability to predict effects accurately is also affected by the limitations of the baseline data. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure assumptions are explained in full.<sup>14</sup> In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### Healthy and Vital Communities

7.7 The Healthy and Vital Communities IIA Objective focuses on updates to policies that seek to improve health outcomes and support balanced and inclusive communities with a strong community identity. The Local Plan Update Consultation Document introduces new relevant policies relating to health and wellbeing, climate resilience, and housing, as well as adding supplementary text to existing policies carried over from the adopted Local Plan. No significant changes are being made to the spatial strategy.

#### ***Summary of the original conclusions for the policy appraisal section for Population and Communities and Health and Wellbeing in the 2017 Sustainability Appraisal***

7.8 The 2017 SA identified positive effects in relation to healthy and vital communities reflecting the spatial strategy that connects new development with services, facilities, sustainable transport modes, and open spaces. Furthermore, the policy framework was considered to positively contribute to increasing the provision of community infrastructure and open spaces. Expected improvements to the quality of the built environment and public realm as well as active travel opportunities and the green

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<sup>13</sup> AECOM (2017). 'SA Report to accompany the Local Plan Submission Draft (as updated by Focussed Changes)'.

<sup>14</sup> As stated by Government Guidance (The Plan Making Manual, see [here](#)):

"Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification"



infrastructure network were also considered for benefits in relation to health and wellbeing.

- 7.9 Key policies recognised as supporting healthy communities include: Policy DS1 which enables the provision of housing, Policy DS2 which provides a principle for development within settlement boundaries (supported by Policy DS3 on development outside of settlement boundaries), the housing policies (H1 - H7) which seek a range of housing types and tenures, including affordable housing and specialist housing, infrastructure policies (INF4 - INF7) which seek improvements to infrastructure and sustainable transport connections, policies under the economic section (EC7 - EC8), particularly those that relate to town and retail centres, and environment policies (ENV1 - ENV9) that protect the landscape, provide access to the countryside, deliver high-quality design, and enhance the green infrastructure network.

### *Updates to relevant policies*

- 7.10 Of note, the Local Plan Update Consultation Document introduces a new policy; Policy SD4 on health and wellbeing. The policy seeks to ensure development proposals demonstrate regard for healthy places and healthy development principles, creating spaces readily walkable, inclusive, safe, and accessible, including by providing good access to healthcare and the natural environment. Furthermore, the policy requires a Health Impact Assessment accompanies proposals for major development. The embedded health considerations will benefit healthy communities and encourage inclusive development and contribute to reducing health inequalities.
- 7.11 Updates are also being made to sustainable transport policies, with new Policy CC8 identifying that development must provide and optimise walking, cycling, and public transport connections to key off-site destinations. Furthermore, the policy recognises the benefits of early infrastructure delivery (prior to occupation) that establishes healthy lifestyles in new development from the outset.
- 7.12 The spatial development strategy remains largely the same, with only minor updates made at Cirencester and Andoversford. It is therefore recognised that the benefits of a connected spatial strategy (as recognised in the previous SA) remain. Housing policies have been updated, and along with new policies (Policies H8 – H11) seek to improve access to specialist housing and affordable housing, and introduce new measures around extensions, replacement dwellings, community-led housing developments, and provisions for homelessness (Policy H11). All housing policies positively contribute to creating balanced and inclusive communities, where vulnerable groups are accommodated, and safe environments are promoted conducive to healthy living.
- 7.13 Furthermore, new, and updated policies seek to improve the sustainability performance of the built and natural environment, including through energy efficiency improvements (and reducing fuel poverty), improved flood management measures, nature-based solutions and an enhanced and connected green and blue infrastructure network, and improved sustainable transport connections (including active travel opportunities) (Policies SD1, SD2, CC1 – CC8, ENV17). Additionally, a new design code is introduced (Policy SD3) which will help ensure high-quality housing and development in safe and inclusive environments.

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Increased delivery of affordable housing.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Increased provisions for specialist housing needs.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Increased provision of community infrastructure	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Connected development providing residents with access to services, facilities, sustainable transport modes, employment opportunities and open/ recreational spaces.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
High-quality and sustainable design and construction.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Embedded health considerations/ healthy environment principles in new development proposals.	Direct, long-term, and positive.	None proposed.	New update
Improved climate resilience bolstering community resilience to climate change.	Direct, long-term, and positive.	None proposed.	New update

## Housing

7.14 The Housing IIA Objective focuses on updates to policies that seek to improve the provision of homes to meet local needs. The Local Plan Update Consultation Document introduces new relevant policies relating to housing and climate resilience, as well as adding supplementary text to existing policies carried over from the adopted Local Plan. No significant changes are being made to the spatial strategy.

### *Summary of the original conclusions for the policy appraisal section for Housing in the 2017 Sustainability Appraisal*

7.15 The 2017 SA identified likely positive effects overall reflecting: the housing provisions that take full account of housing need, the increased delivery of affordable housing, and provision for specialist housing such as Gypsy and Traveller sites. Furthermore, positive effects were also identified because of a relatively connected spatial strategy, with development areas providing good access to services, facilities, sustainable transport connections, and open spaces. Key policies recognised as supporting the provision of a suitable range of high-quality homes include: Policy DS1 which enables

the provision of housing, the housing policies (H1 - H7) which seek a range of housing types and tenures, including affordable housing and specialist housing, infrastructure policies (INF4 - INF7) which seek improvements to infrastructure and sustainable transport connections, and environment policies (ENV1 - ENV9) that protect the landscape, provide access to the countryside, deliver high-quality design, and enhance the green infrastructure network (all contributing to high-quality housing).

### *Updates to relevant policies*

- 7.16 The spatial development strategy for the Plan remains largely the same (albeit a couple minor updates at Cirencester and Andoversford). Therefore, the positive effects concluded in the 2017 SA are considered likely to remain, reflective of a housing delivery plan that meets forecasted needs in full, delivering development in accessible and connected locations, and providing for a range of housing types and tenures to address varying needs across the district.
- 7.17 Additional housing policies are being introduced, alongside updates to the existing housing policies. Notably, these changes introduce higher levels of affordable housing contributions with more stringent criteria to deliver affordable housing on-site, and new measures to improve the accessibility and adaptability of a proportion of affordable housing in developments, to provide additional support to vulnerable groups such as older people and disabled people. Policy H10 (Community-Led Housing) is also introduced to facilitate resident-led development schemes delivering affordable housing that is legally protected in perpetuity.
- 7.18 New criteria around dwellings for rural workers and the removal of occupancy conditions in rural areas are introduced that seek to facilitate local needs and prioritise affordable housing whilst protecting the landscape and rural character. New policies are also introduced for replacement dwellings and extensions and alterations to existing dwellings (Policies H8 and H9) that place tight controls over the scale and location of new development on-site as well as space standards. The supporting text recognises the potential to improve the sustainability performance and quality of housing in replacement dwellings and extensions, and it is recommended that the policy wording itself draws out direct links to overarching sustainable development policies, design policies and policies that respond to the climate emergency – recognising the need to improve the sustainability performance of existing housing in many cases and how this would be viewed positively.
- 7.19 Of note, Policy H11 is also introduced, requiring financial contributions to homelessness housing provision in new developments of 10 or more homes (or sites with an area of 0.5ha or more). The policy extends support to another vulnerable group in the population with acute affordable housing needs.
- 7.20 Additionally, criteria are introduced to Policy EC4 that facilitates PBSA (Purpose Built Student Accommodation) development at the Royal Agricultural University, recognising the value of PBSA in meeting student housing needs and avoiding impacts to the balance of housing types within communities (i.e., avoiding an over-concentration of Houses in Multiple Occupation (HMOs)).
- 7.21 The Plan is also supplemented with a Cotswold Design Code (Policy SD3), which will ensure future housing is in-keeping with local character and of a high-quality.

## Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Housing provision that takes full account of housing need.	Direct, long-term, and positive.	None proposed.	No change
Increased delivery of affordable housing.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Increased provisions for specialist housing needs.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Direct financial contributions to homelessness housing provision.	Direct, long-term, and positive.	None proposed.	New update
Connected development providing residents with access to services, facilities, sustainable transport modes, employment opportunities and open/ recreational spaces.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
High-quality and sustainable design and construction.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Greater control over changes to existing housing stock.	Direct, long-term, and positive.	The policy could be enhanced by direct links to overarching sustainable development policies, design policies and policies that respond to the climate emergency – recognising the need to improve the sustainability performance of existing housing in many cases and how this would be viewed positively.	Enhanced positive effects.

## Economy and Employment

7.22 The Economy and Employment IIA Objective focuses on updates to policies that seek to improve economic performance and access to employment opportunities. The Local Plan Update Consultation Document introduces new relevant policies relating to equestrian development, climate resilience and renewable energy development, and housing, as well as adding supplementary text to existing policies carried over from the adopted Local Plan – including those relating predominantly to the economy and employment. No significant changes are being made to the spatial strategy.

### ***Summary of the original conclusions for the policy appraisal section for Economy and Enterprise in the 2017 Sustainability Appraisal***

7.23 The 2017 SA concluded largely positive effects in relation to Economy and Enterprise because of the Local Plan support for improved infrastructure development, employment development and growth in the rural economy, healthy town/ village centres, and growth in the tourism sector, as well as through continued protection for existing employment sites. Key policies recognised as supporting a growing and fair economy include infrastructure policies (INF4 - INF7) which seek improvements to infrastructure and sustainable transport connections, and policies under the economic section (EC1-EC11) dedicated to employment development, the protection of existing employment sites, the rural economy, the tourism industry, and town and retail centres.

#### ***Updates to relevant policies***

7.24 The spatial development strategy for the Plan remains largely the same, delivering new employment land to meet forecasted needs, and locating housing in connected areas providing access to sustainable transport options and employment opportunities. Therefore, the positive effects concluded in the 2017 SA are considered likely to remain.

7.25 Policies relating to the economy and employment have been updated. Notably, these updates place greater emphasis on connecting employment development with sustainable transport modes and safeguarding existing employment sites. Updates are also made to the 'Special Policy Areas' policy to allow for further PBSA development at the Royal Agricultural University and allocate 2.4ha of land for a primary school at Moreton-in-Marsh, recognising the intrinsic links between employment and education and healthy communities. New criteria are introduced to the rural diversification policy (Policy EC5) and Policy EC6 relating to the conversion of rural buildings. These criteria seek to strengthen the policy position, particularly by embedding sustainability considerations such as retaining and reusing existing building materials where possible. The former Retail and Town Centres policies have been combined as one single policy, continuing with the identified hierarchy of town centres and areas that will be a focus for retail development and incorporating provisions for neighbourhood planning (to prepare a positive strategy for centres that safeguard and encourage resilience, viability, and vitality). Policies EC10 and EC11 continue to facilitate the development of tourist facilities, visitor attractions, and tourist and visitor accommodation in the right locations. Notably, new hotels and serviced accommodation are directed towards the Town, Key, District and Local Centres as the most connected and accessible areas.

7.26 Two new policies are introduced relating to agriculture and forestry buildings, and equestrian related development. Principles are set for new development and buildings that recognise the needs of these economic sectors.

7.27 The updates continue to be supported by an ongoing emphasis on infrastructure development, sustainable transport connectivity in new development, and protection for the natural environment and landscape, including those areas that attract tourism and inward investment.

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Employment development strategy to meet employment needs.	Direct, long-term, and positive.	None proposed.	No change
Opportunities to support tourism growth	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Support for the rural economy	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Focused retail, leisure, and visitor accommodation development in accessible areas.	Direct, long-term, and positive.	None proposed.	New update
Growth in educational establishments.	Direct, long-term, and positive.	None proposed.	New update
Ensuring timely infrastructure delivery	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
High-quality and sustainable design and construction that promotes inward investment.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.

## Equalities

7.28 The Equalities IIA Objectives focuses on updates to policies that seek to reduce inequalities, promote diversity, and ensure social inclusion. The Local Plan Update Consultation Document introduces new relevant policies relating to health and wellbeing, climate resilience, and housing, as well as adding supplementary text to existing policies carried over from the adopted Local Plan.

### *Summary of the original conclusions for the policy appraisal section for Equalities in the 2017 Sustainability Appraisal*

7.29 The 2017 SA did not include an SA objective dedicated to assessing the potential impacts for equalities, diversity, and social inclusion. This has emerged more recently as an IIA Objective as it reflects the integrated approach to impact assessment (incorporating SA, SEA, HIA, and EqIA).

### *Updates to relevant policies*

7.30 Equalities has been embedded as part of the new overarching sustainable development policy (Policy SD1), recognising the built and natural environment's role in improving health inequalities, including by providing for decent and affordable homes that meet identified resident needs in areas connected to services, facilities, employment opportunities, and recreational opportunities.

- 7.31 Additional housing policies are being introduced, alongside updates to the existing housing policies. Notably, these changes introduce higher levels of affordable housing contributions with more stringent criteria to deliver affordable housing on-site, and new measures to improve the accessibility and adaptability of a proportion of affordable housing in developments, to provide additional support to vulnerable groups such as older people and disabled people. The policy framework ensures provision is made for a range of housing types and tenures, including specialist housing that will help to meet the needs of vulnerable groups and groups with protected characteristics. Another key change relates to the new Policy H11 which requires financial contributions to homelessness housing provision in new developments of 10 or more homes (or sites with an area of 0.5ha or more). The policy extends support to a vulnerable group in the population with acute affordable housing needs.
- 7.32 The updates also seek to reinforce the need for connected development, and the new Policy CC8 (Sustainable Transport) seeks to provide access to public transport facilities for all users, particularly more vulnerable users, and those with disabilities. Vulnerable users and those with disabilities are also prioritised as part of the approach to highway safety (Policy INF4) alongside measures that seek to avoid any severance of communities (promoting inclusiveness).

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Housing provision that takes full account of housing need.	Direct, long-term, and positive.	None proposed.	No change
Increased delivery of affordable housing.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Increased provisions for specialist housing needs.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Increased provision of community infrastructure	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Embedded health considerations/ healthy environment principles in new development proposals.	Direct, long-term, and positive.	None proposed.	New update
Explicit support for more vulnerable groups.	Direct, long-term, and positive.	None proposed.	New update
Opportunities to reduce inequalities.	Direct, long-term, and positive.	None proposed.	New update

## Transport and Air Quality

7.33 The Transport and Air Quality IIA objective focuses on updates to policies that deliver air quality improvements and improve the local transport network within the district. The Local Plan Update Consultation document introduces new relevant policies under the new 'Sustainable Development' and 'Climate Mitigation and Adaptation' themes, as well as adding supplementary text to existing policies carried over from the adopted Local Plan.

### *Summary of the original conclusions for Transport and Air Quality in the 2017 Sustainability Appraisal*

- 7.34 The 2017 SA identified air quality in the district is generally good, with only one declared Air Quality Management Area (AQMA). However, road transport remains a significant contributor to local air quality issues.
- 7.35 Good accessibility to services and facilities significantly impacts residents' quality of life, community vitality, health, and environmental factors. Unfortunately, many areas in the district face limitations due to dispersed settlements and insufficient public transport. To address this, policies have been included which aim to provide essential amenities to reduce the need to travel. Additionally, policies enhance accessibility by promoting sustainable transport modes and concentrating services in larger town centres. These policies were considered likely to secure overall positive effects in relation to environmental quality.
- 7.36 While town centres are accessible, rural areas still struggle with service viability. Policies are included to ensure that more rural housing developments are accompanied by adequate services and facilities, again securing likely positive effects.

### *Recommendations*

- 7.37 No recommendations are offered in the SA (2017); however, one was offered in AECOM's Interim IIA Report to accompany Issues and Options Consultation (2022). The Interim IIA Report appraised different policy options related to accessibility for new housing development. It concluded that the introduction of '*minimum accessibility requirements for new residential development sites*' would lead to greater positive benefits than the '*business as usual*' case and the option to '*introduce modal share and vehicle generation targets...*'.

### *Updates to relevant policies*

- 7.38 The Local Plan Update Consultation document introduces several new policies under the new 'Sustainable Development' and 'Climate Mitigation and Adaptation' themes. These reinforce the need for developments to maximise the district's potential to encourage modal shift towards public and active transport journeys and away from private vehicles. This is explicitly stated in Policy SD1 Sustainable Development. Policy SD3 Cotswold Design Code (formerly EN2) compliments Policy SD1 by requiring developments to 'design in' measures that facilitate modal shift. Policy CC8 Sustainable Transport (formerly Policy INF3) acknowledges changes to the Climate Change Act in 2019, which works to fast-track the UK's transition to Net Zero. The updated policy requires new development to 'provide and optimise' active and public transport options between the site and key destinations. Amendments to Policy DS3 Small-scale Residential Development in Non-principal Settlements includes minimum accessibility requirements (as recommended in AECOM's Interim IIA Report (2022)) using active/public transport journey times, ensuring that development is appropriately located to maximise modal shift.



- 7.39 The 'Infrastructure' theme contains several policies directly related to transportation. Two of these policies have been supplemented with additional text: INF4 Highway Safety and INF5 Parking Provision. Amendments to Policy INF4 encourage developments to improve the safety of roads and pavements for both the drivers and pedestrians, through techniques such as inclusion of safety features by design (like street lighting and surveillance) and constraining vehicle speeds in target areas. Policy INF5 acknowledges that private transport will still be a part of the district's future; additional text has been added to the policy to outline that developments for car parking will be suitably located to avoid impacts on local traffic. The policy is also updated with text to ensure that development with car parking includes spaces for alternative forms of transport (such as bicycles, eBikes and shared vehicles), as well as setting a minimum requirement for the delivery of accompanying electric vehicle charging points.
- 7.40 Finally for transport, Policy EC1 Employment Development acknowledges that journeys to workplaces can be improved to be more sustainable, and thus supports developments that encourage journeys to work that are made by public transport.
- 7.41 All the policy changes discussed above (that collectively work towards encouraging modal shift within the district) will have direct positive impacts on the local transport network and indirect positive impacts on the district's air quality, by taking cars off the road and reducing congestion.
- 7.42 All the amendments that refer directly to air quality fall under Policy CC2 Renewable Energy (formerly Policy INF10). The policy states that as a result of the Council's climate emergency declaration, the Plan will seek opportunities for renewable energy generation, energy storage, and distribution networks, only if the developments can avoid negative impacts on local air quality (amongst other factors). Other amendments to sub-policies under Policy CC2 encourages the use of renewable energy within the district, which will also have knock-on positive effects to local air quality due to the associated reduction in local particulate emissions.
- 7.43 Finally, updates to policies related to the delivery of Green Infrastructure, such as Policy CC7 Green Infrastructure, strengthens the district's position on the need to protect and upgrade its existing Green Infrastructure network as part of any new developments that come forward. In doing so, this will have indirect positive effects on local air quality, given the role vegetation plays in cleaning local air.

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Enhancements to air quality in the district	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Reducing need to travel.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Modal shift to public/active travel.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Improved access to services and facilities.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.

Enhanced green infrastructure network supporting clean air.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
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## Climate Change

7.44 A key IIA objective is to address the causes of climate change through reducing emissions of greenhouse gases. In the adopted Local Plan, this objective was addressed through policies across several themes, including Infrastructure, Environment, and Economy. The Local Plan Update Consultation document provides a greater spotlight on how the district can adapt to and mitigate climate change, by introducing a suite of new policies under ‘Sustainable Development’ and ‘Climate Mitigation and Adaptation’ themes.

### **Summary of the original conclusions for Climate Change in the 2017 Sustainability Appraisal**

#### Climate Change Mitigation

7.45 The 2017 SA concludes likely positive effects because of measures to reduce the need to travel and encourage a modal shift, and support for the development of renewable energy installations. Concerning the provision of low carbon energy, policies in the Local Plan aim to support the generation of energy from renewable or low carbon sources, provided that potential adverse impacts are avoided. Additionally, the Local Plan encourages developers to demonstrate how they plan to incorporate renewable energy and low carbon technologies into new developments.

7.46 Regarding sustainable transport and green infrastructure, various policies work together to reduce emissions associated with car use by promoting a shift to alternative modes of transportation. This is further supported by policies focusing on retail, main town centre uses, and town centre strategies, all of which aim to enhance accessibility through sustainable transport modes and reduce the need for extensive travel by concentrating services in town centres.

7.47 The Local Plan introduces a Design Code for the district, emphasising sustainable design principles. This aspect of the Cotswold Design Code encourages improved energy efficiency and the integration of renewable energy provisions in both new and existing buildings, ensuring a comprehensive approach to sustainable development.

#### Climate Change Adaptation

7.48 The importance of green infrastructure is recognised as a powerful tool to manage environmental risks such as flooding and heat waves. Policies aim to ensure that new development contributes to protecting and enhancing existing green spaces, both within and beyond development sites. These efforts, supported by landscape-scale approaches, enhance ecological resilience and contribute to climate change adaptation. Despite this, uncertain effects are noted in the 2017 SA in relation to carbon sequestration and provision of woodfuel through extension of wood planting.

### **Recommendations**

7.49 The 2017 Sustainability Appraisal offers one recommendation in relation to this SEA topic: *‘...it is recommended that the benefits of extending wood planting for carbon storage and woodfuel provision is given greater policy prominence in the Local Plan policies, perhaps as part of Policy EN7 (Trees, Hedgerows and Woodlands)’.*

7.50 Additionally, AECOM’s Interim IIA Report to accompany Issues and Options Consultation (2022) provided four recommendations:

- *‘Update the Cotswold Design Code to introduce a new building standards policy that requires new buildings to be zero carbon, in terms of the construction and lifetime use within the plan period’.*
- *‘Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development’.*
- *‘Outside of the AONB, safeguard areas identified as suitable locations for the delivery of renewable energy’.*
- *‘Facilitate the identification of broad areas within the AONB where renewable energy might be appropriate, and looked on favourably through the planning process’.*

### **Updates to relevant policies**

- 7.51 The Local Plan Update Consultation document strengthens its position on addressing climate change through the introduction of a suite of new policies under the (also new) ‘Sustainable Development’ and ‘Climate Mitigation and Adaptation’ themes, along with adding text to existing policies that have been carried forward.
- 7.52 The ‘Sustainable Development’ theme introduces four new policies, three of which are directly related to this SEA theme - Policies SD1 through SD3 - which aim to ensure that development within the district enhances social, economic, and environmental conditions. An important part of sustainable development is the transition to a low-carbon society; this is emphasised by Policy SD1 Sustainable Development, which stipulates that development within the district should consider climate change through mitigation and adaptation measures at the design stage (e.g. by requiring local Biodiversity Net Gain). The Plan’s position on addressing climate change is further strengthened through: Policy SD2 The Climate and Ecological Emergencies, which support’s Cotswold District Council’s decision to announce climate and ecological emergencies by providing detail as to how developments can mitigate and adapt to climate change; and Policy SD3 Cotswold Design Code, which encourages low-carbon (rather than zero-carbon, as advised in the Interim IIA Report [2019]) developments within the district.
- 7.53 The new ‘Climate Mitigation and Adaptation’ theme also introduces three brand new policies (Policies CC1 Retrofitting Existing Buildings, CC3 Net Zero Carbon New Buildings, and CC4 District Heating), directly aimed at reducing the carbon footprint of the district’s existing buildings and new developments. Key points within these policies include support for developments that: result in high energy efficiency; are supplied by renewable technologies opposed to those reliant on fossil fuels (relevant to both existing buildings and new developments); and low-carbon building practices (e.g. using Net Zero principles).
- 7.54 Also included under the new Climate Mitigation and Adaptation theme are several policies that have replaced existing policies from the adopted Local Plan. This includes Policy CC2 and Policies CC5 through CC8. Policy CC2 Renewable Energy (formerly Policy INF10) strengthens the original policy by explicitly providing guidance on different types of renewable energy generation development, including wind power, which was previously omitted from the original policy. The policy does not specify any areas safeguarded as suitable sites for renewable energy generation, as recommended in the Interim IIA Report (2019); however, Cotswold Council have commissioned a Renewable Energy Study and a Landscape Sensitivity Assessment (both in 2023) which will be used to identify potentially suitable areas for wind and solar energy. Updates to policies CC5 Managing Flood Risk and CC6 Water Management Infrastructure strengthen the Plan’s approach on adapting to climate

change by including additional guidance on Sustainable Drainage Systems (SuDS) and the inclusion of Natural Flood Management techniques (where appropriate). The remaining policy revisions within this theme provide further support for the enhancement of the district’s Green Infrastructure network (which will indirectly benefit adaption and mitigation to climate change) (Policy CC7 Green Infrastructure) and ensures that developments provide active and public transport infrastructure to ‘key-off site origins and destinations’ as well as ensuring that sustainable transport infrastructure is delivered in a timely manner (Policy CC8 Sustainable Transport).

7.55 Finally, the Local Plan Update Consultation document further strengthens the focus of climate adaption and mitigation by including additional text to existing, indirectly related, policies in the adopted Local Plan. These amendments can be grouped as follows:

- Encouraging developments that facilitate low-carbon transport: Policy SD4 Health and Well-being; and Policy INF5 Parking Provision.
- Encouraging recycling/reuse of existing buildings and materials: Policy EC6 Conversion of Rural Buildings; Policy EC11 Tourist and Visitor Accommodation; and EC12 Equestrian Related Development.
- Preference for developments that avoids damage to, and/or enhances, local biodiversity and habitats: EC12 Equestrian Related Development; EN7 Trees, Hedgerows, Orchards and Woodlands; and EN8 Biodiversity and Geodiversity: Features Habitats and Species.

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Reduction in greenhouse gas emissions through reducing need to travel and modal shift.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Reduction in greenhouse gas emissions from development of renewable energy installations.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Carbon sequestration and provision of woodfuel through extension of wood planting.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.

## Historic Environment

7.56 Cotswold District, situated within the Cotswolds National Landscape, holds a significant historical legacy, preserved in numerous archaeological sites, historic structures, and landscapes. The Historic Environment IIA objective focuses on policy changes that have the potential to impact the district’s historic environment assets and their setting.

### ***Summary of the original conclusions for Historic Environment in the 2017 Sustainability Appraisal***

- 7.57 Policies in the Local Plan emphasise the protection and improvement of landscape and townscape quality, as well as the conservation and enhancement of the historic environment.
- 7.58 The Cotswolds National Landscape, which covers a significant portion of the district's total area, is a focal point for policies, which prioritise conserving and enhancing the natural and historic beauty, character, and special qualities of the National Landscape. Additionally, there is a concerted effort to align the Local Plan with the National Landscape Management Plan for coordinated development.
- 7.59 Policies are also in place to ensure the protection and enhancement of the historic landscape district-wide; development is permitted only if it does not adversely affect landscape character or tranquillity and aims to enhance key features and areas.
- 7.60 A comprehensive approach to design, guided by the Cotswold Design Code, ensures new developments reflect local character areas and incorporate landscape and green infrastructure elements.
- 7.61 Specific policies address town centre uses, tourism, transport, employment sites, and designated heritage assets, promoting quality, attractiveness, and character while limiting adverse impacts. Conservation areas receive particular attention, ensuring protection and enhancement in conjunction with Conservation Area Appraisals.
- 7.62 In Cirencester town centre, historic resources are safeguarded and enhanced through specific strategies targeting the built environment, townscape character, and historic assets.
- 7.63 The restoration of the Thames and Severn Canal is supported is also supported through policies which enhance recreational opportunities and accessibility, while conserving its setting.
- 7.64 Sustainable transport policies aim to reduce car use, promote modal shift, and enhance accessibility through focussing services in town centres, thereby raising awareness of townscape character and the historic environment.
- 7.65 On this basis, the 2017 SA concludes positive effects in relation to the protection and enhancement of heritage assets, Cirencester town centre (as a key historic resource), and by increased awareness of heritage assets through promotion of sustainable transport improvements.

### ***Updates to relevant policies***

- 7.66 The Local Plan Update Consultation document introduces several new policies under the new 'Sustainable Development' and 'Climate Mitigation and Adaptation' themes. Beginning with new policies under the Sustainable Development theme, Policies SD1 Sustainable Development and SD3 Cotswold Design Code, provide support for developments that protect and enhance the district's built, historic, and natural environment through considered design. New Policies in the Climate Change and Adaption theme aim to increase renewable energy usage and generation within the district. Policy CC1 Retrofitting and Decarbonisation of Existing Buildings provides guidance on how this can be achieved to avoid negative impacts on designated heritage assets and their settings by listing several mitigation measures that should be considered when such changes to designated heritage assets are proposed. Policy CC2 Renewable Energy also stipulates that new renewable energy generation projects (such as solar farms and wind turbines) would not be supported if they significantly impact the landscape within the district.

- 7.67 The adopted Local Plan contains several policies directly related to the historic environment. One of these, EN12 Historic Environment: Non-designated Heritage Assets, has been strengthened to provide additional protection for non-designated heritage assets. In the adopted Local Plan, assessments are required only when total demolition/loss of a non-designated heritage asset is proposed; however, the updates to this policy extend the need for an assessment to proposals that will 'directly or indirectly' affect non-designated heritage assets. The policy is also updated to place the responsibility of undertaking assessments for non-designated assets on the prospective developer and requires them to be conducted prior to submission of 'planning or related applications'.
- 7.68 New policy H8 Replacement Dwelling also provides additional protection for the district's heritage assets by specifying that a building cannot be replaced if it is a listed building or heritage asset.
- 7.69 Finally, other new policies, and amendments to policies carried over from adopted Local Plan, will have indirect impacts on the district's heritage assets. These can be grouped in the following categories:
- Additional protection for sensitive landscape assets: Policy EN16 Dark Skies; Policy DS3 Small-Scale Residential Development in Non-Principal Settlements; EC5 Rural Diversification; and EC7 Agricultural and Forestry Buildings.
  - Improved access to heritage assets through public/active travel infrastructure improvements: INF4 Highway Safety; and INF5 Parking Provision.

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Protection and enhancement of heritage assets, including repair and reuse where appropriate.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
Protection and enhancement of Cirencester town centre, a key historic environment resource.	Direct, long-term, and positive.	None proposed.	No change.
Increased accessibility of heritage assets through promotion of sustainable transport improvements.	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.

## Landscape

- 7.70 Landscape is an important IIA theme within Cotswold District, given that approximately 80% of the district overlaps with the Cotswolds National Landscape. The Landscape IIA objective focuses on policy changes that have the potential to impact key feature within the district's landscape, including aesthetic beauty, historical and cultural significance, and ecological features.

### ***Summary of the original conclusions for Landscape in the 2017 Sustainability Appraisal***

- 7.71 Planning policies in the Local Plan emphasise the protection and enhancement of landscape and town character. This includes special attention to the Cotswolds National Landscape.
- 7.72 Major development within the National Landscape is subject to stringent criteria, with exceptions guided by national policy. Policies are also included to afford additional protection for especially sensitive areas to changes in the landscape, such as the Royal Agricultural College and Campden BRI. Development of tourist facilities is also controlled to safeguard the natural and built environment.
- 7.73 The Local Plan outlines measures to protect and enhance the wider landscape, ensuring new development aligns with local character areas and design standards. Green infrastructure policies emphasise the conservation and enhancement of existing features and biodiversity.
- 7.74 Policies promoting sustainable transport and green infrastructure aim to reduce car use, thus supporting landscape character by limiting traffic growth and promoting sustainable transport modes.
- 7.75 On this basis, the 2017 SA concludes positive effects due to the proposed enhancements to landscape and townscape character.

### ***Updates to relevant policies***

- 7.76 The Local Plan Update Consultation document introduces several new policies under the new 'Sustainable Development' and 'Climate Mitigation and Adaptation' themes. Beginning with new policies under the Sustainable Development theme, Policies SD1 Sustainable Development and SD3 Cotswold Design Code, provide support for developments that protect and enhance the district's built, historic, and natural environment through considered design. New Policies in the Climate Change and Adaption theme support developments related to increasing renewable energy usage and generation within the district. Whilst some of the technologies associated with renewable energy have the potential for significant landscape impacts (such as wind turbines and solar farms), Policy CC2 stipulates that these types of development will only be acceptable when significant landscape and visual impacts can be avoided, for example by avoiding areas of high landscape sensitivity within the Cotswolds National Landscape.
- 7.77 There is one new policy (, that is directly related to landscape – EN16 Dark Skies, under the Built, Natural and Historic Environment theme. This policy ensures that development in sensitive areas will not significantly impact the existing intrinsic quality of dark night skies, which is a special characteristic of the Cotswolds National Landscape.
- 7.78 Other new policies, and amendments to policies carried over from adopted Local Plan, afford additional protection to the district's landscape features. These can be grouped in the following categories:
- Ensuring that development is appropriately located and follows traditional patterns of development: Policy DS3 Small-Scale Residential Development in Non-Principal Settlements; Policy H8 Replacement Dwellings; Policy H9: Extensions and alterations to dwellings; EC5 Rural Diversification; EC7 Agricultural and Forestry Buildings; and EC12 Equestrian Related Development.
  - Ensuring that development is appropriately designed to be in-keeping with the surrounding environment: EC5 Rural Diversification; EC6 Conversion of Rural

Buildings; EC7 Agricultural and Forestry Buildings; and EC12 Equestrian Related Development.

- Additional protection for historical landscape features: Policy H8 Replacement Dwellings.
- Additional protection for natural landscape features: CC7 Green Infrastructure; EN17 Management of Accessible Green Open Spaces in Residential Developments; and Policy EN7 Trees, Hedgerows, Orchards and Woodlands.
- Reducing traffic and congestion in the district: CC8 Sustainable Transport; Policy DS3 Small-scale Residential Development in Non-principal Settlements; INF4 Highway Safety; and INF5 Parking Provision.

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Enhanced landscape and townscape character	Direct and indirect, long-term, and positive	None proposed.	Enhanced positive effects.
Support the integrity of the Cotswolds National Landscape	Direct and indirect, long-term, and positive	None proposed.	Enhanced positive effects.

## Green Infrastructure and Natural Capital

7.79 Green Infrastructure refers to a network of multi-functional green and blue spaces found in urban and rural areas (such as parks, rivers, trees, and design elements like green roofs). Natural Capital refers to environmental assets that provide beneficial services to humans, directly or indirectly. In the 2017 SA, the assessment of Green Infrastructure was predominantly included under the Biodiversity SEA theme; however, in this IIA, Green Infrastructure and Natural Capital is considered to be its own distinct topic for assessment.

### Summary of the original conclusions for Green Infrastructure and Natural Capital in the 2017 Sustainability Appraisal

7.80 The 2017 SA did not include an SA objective dedicated to assessing the potential impacts for green infrastructure and natural capital. This has emerged more recently as an IIA Objective as it better reflects the integrated approach to impact assessment (incorporating SA, SEA, HIA, and EqIA) and the nature of the climate emergency.

7.81 The overarching strategy of the Local Plan addresses climate change, habitat loss, and fragmentation through initiatives that create new habitats and enhance the management of existing ones. These efforts collectively foster ecological networks at both district-wide and sub-regional levels. To do this, policies across several themes in the Local Plan require new developments to contribute towards the protection and improvement of the district's existing Green Infrastructure and Natural Capital. Additionally, where Green Infrastructure and Natural Capital may be lost through development, policies are included to suggest that compensatory planting will be required.



7.82 The Local Plan also acknowledges the importance of a coordinated, landscape-scale, approach towards protecting and enhancing Green Infrastructure and Natural Capital, aligning its policies with regional initiatives led by Gloucestershire County Council.

### **Recommendations**

7.83 No recommendations are offered in the SA (2017). However, in AECOM’s Interim IIA Report to accompany Issues and Options Consultation (2022), which appraised different levels of Biodiversity Net Gain (BNG), it recommended that 20% BNG would lead to greater positive effects than the mandatory 10% BNG level (from the Town and Country Planning Act [as amended]).

### **Updates to relevant policies**

7.84 The primary policy for Green Infrastructure and Natural Capital in the adopted Local Plan has changed from ‘Policy INF7 Green Infrastructure’ to ‘Policy CC7 Green Infrastructure’. In its updated form, the policy gives greater recognition to the importance of Green Infrastructure as a network, rather than a series of individual sites. The updated policy also requires that the provision of Green Infrastructure is an important element of any new development and is given consideration at the early design stages. Finally, text is also added to the policy to align the district’s Green Infrastructure strategy with the wider ‘Nature Recovery Network and the Strategic Framework for Green Infrastructure for Gloucestershire’, in addition to stipulating that the design of new Green Infrastructure will adhere to the latest national guidance.

### **Updated Appraisal Summary**

<b>Likely Significant Effect</b>	<b>Effect Dimensions</b>	<b>Recommendations / mitigation</b>	<b>Comparison to Original Appraisal</b>
Increased habitat and greenspace through green infrastructure enhancements.	Direct, long-term, and positive.	Locations that should be targeted for off-site contributions, biodiversity net gains, and tree planting could be identified.	Enhanced positive effects.

## **Biodiversity**

7.85 A key IIA objective is to preserve and enhance Cotswold District’s biodiversity. In the adopted Local Plan, this objective was directly addressed through policies in the Environment theme, as well as other complimentary policies under related themes. The Local Plan Update Consultation document includes new policies under the ‘Built, Natural and Historic Environment’ theme and the new ‘Sustainable Development’ and ‘Climate Mitigation and Adaption’ themes. These new policies, along with amendments to the text within other indirectly related policies, are included in this appraisal.

### **Summary of the original conclusions for the policy appraisal section for Biodiversity in the 2017 Sustainability Appraisal**

7.86 The adopted Local Plan’s approach to biodiversity is realised through a series of policies that discourages habitat fragmentation and loss of ecological connectivity while favouring proposals that emphasise the protection and enhancement of habitats, species, and ecological connections within the district.

- 7.87 The strategy promotes a landscape-scale approach to biodiversity enhancements, aligning with ongoing initiatives related to Nature Improvement Areas and broader conservation plans.
- 7.88 Robust protection measures are given to internationally designated sites, in alignment with national planning policies and conservation legislation. The strategy also recognises the importance of local geological sites for geodiversity, reinforcing provisions for their protection.
- 7.89 Policies are also included to encourage the conservation and enhancement of Green Infrastructure features (such as trees, hedgerows, and woodland) through new developments, supporting ecological networks at both district and regional scales.
- 7.90 Additional policies aligned with the biodiversity strategy ensure that ecological considerations are integrated into various development areas, emphasising surveys and monitoring are embedded within development plans, where appropriate. Furthermore, specific policies for notable features, like the Thames and Severn Canal and former minerals workings in the Cotswold Water Park, aim to enhance biodiversity value in targeted areas of the district.
- 7.91 Considering these points, the 2017 SA concluded positive effects overall.

### **Recommendations**

- 7.92 No recommendations were offered in the SA (2017). However, AECOM's Interim IIA Report to accompany Issues and Options Consultation (2022), which appraised various levels of Biodiversity Net Gain (BNG), recommended that 20% BNG would lead to greater positive benefits than the mandatory 10% BNG level (from the Town and Country Planning Act [as amended]).

### **Updates to relevant policies**

- 7.93 Through the introduction of new policies, and updates to policies contained in the adopted Local Plan, the Local Plan Update Consultation document strengthens its position with regard to the protection and enhancement of the district's biodiversity.
- 7.94 Beginning with the new policies relevant to this IIA topic, Policies SD1 Sustainable Development and SD2 The Climate and Ecological Emergencies (both found under the new 'Sustainable Development' theme), work together to ensure that the protection and enhancement of biodiversity are key principles that should be to be incorporated into new development within the district. To achieve this there is a strong focus across the two policies regarding the need for development to deliver 10% BNG that is local, measurable, and meaningful (in the adopted Local Plan, BNG is mentioned, but no specific targets are set) and protecting for existing ecological designations and habitats. Whilst the recommendation of 20% BNG from AECOM's Interim IIA Report (2022) has not been carried forward into the Local Plan Update Consultation document, the addition of 10% BNG will still result in positive effects in comparison to the adopted Local Plan.
- 7.95 Two new policies have also been added in the 'Built, Natural and Historic Environment' theme, bolstering its existing environmental protection. Policy EN16 Dark Skies ensures that development in sensitive areas will not significantly impact the existing intrinsic quality of dark night skies, whilst Policy EN17 Management of Accessible Green Open Spaces in Residential Developments ensures that green spaces, of an appropriate type, are delivered and their long-term management is accounted for at the early design stages.
- 7.96 Policy CC7 Green Infrastructure (formerly Policy INF7), under the new 'Climate Mitigation and Adaption' theme has also been strengthened with regard to the

protection and enhancement of Green Infrastructure as a network across the district and county, rather than individual sites, and aligns itself with Gloucestershire’s wider ‘Nature Recovery Network and the Strategic Framework for Green Infrastructure’. The new policy also includes text which gives additional support for developments that deliver new / improve existing Green Infrastructure.

7.97 Finally, the Local Plan Update Consultation document includes additional text to other indirectly related policies that will have a positive impact on the preservation and enhancement of the district’s biodiversity. These amendments can be grouped in a number of topics, including:

- Ensuring that developments are appropriate in size and do not damage existing biodiversity: Policy CC8 Replacement Dwellings; Policy EC12 Equestrian Related Development; and Policy EN8 Biodiversity and Geodiversity: Features Habitats and Species.
- Additional detail on specific types of biodiversity assets that will be protected from development: Policy EN7 Trees, Hedgerows, Orchards and Woodlands.
- Ensuring that developments include enhancements to local biodiversity: Policy EC12 Equestrian Related Development; and Policy EN7 Trees, Hedgerows, Orchards and Woodlands.
- Additional guidance on biodiversity compensation strategies: Policy EN7 Trees, Hedgerows, Orchards and Woodlands.
- Addition of details related to mandatory 10% BNG for relevant developments: Policy EN8 Biodiversity and Geodiversity: Features Habitats and Species.

### Updated Appraisal Summary

Likely Significant Effect	Effect Dimensions	Recommendations / mitigation	Comparison to Original Appraisal
Improved ecological connectivity	Direct, long-term, and positive.	20% BNG could be specified to deliver greater ecological connectivity.	Enhanced positive effects.
Improved ecological resilience	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.
‘Wider’ ecological benefits	Direct, long-term, and positive.	None proposed.	Enhanced positive effects.

## Land, Soil, and Water Resources

7.98 This section assesses the potential impacts of policy changes towards Cotswold District’s land, soil, and water resources (LSW). The Local Plan Update Consultation document includes relevant new policies under the ‘Housing to Meet Local Needs’ theme and the new ‘Sustainable Development’ and ‘Climate Mitigation and Adaption’ themes. These new policies, along with amendments to the text within other indirectly related policies, are included in this appraisal.

### ***Summary of the original conclusions for the policy appraisal section for Land, Soil and Water Resources in the 2017 Sustainability Appraisal***

- 7.99 While there are some measures in place to safeguard high-quality agricultural land, there is an overall lack of explicit protection for the best agricultural land in the district. National policies provide some guidance, but there is room for improvement in local planning efforts to address this issue effectively.
- 7.100 Regarding sustainable development, policies are included to ensure that developments adhere to sustainable design practices, including resource efficiency. Water supply is an important consideration in the Plan's policies, with efforts made to ensure new developments can demonstrate sufficient water supply capacity. Various measures are implemented to manage water resources, such as reducing leakage and protecting groundwater. Additionally, there are requirements for new developments to meet specific water consumption standards and align with water management plans.
- 7.101 Furthermore, there is a focus on protecting water supply from contamination, highlighting the importance of ensuring that developments do not pose risks to water quality. Overall, the policies aim is to strike a balance between development objectives and the preservation of natural resources, particularly agricultural land, and water supplies.
- 7.102 As a result of likely enhancements to water quality and improved sustainable water management, the 2017 SA concludes positive effects with an element of uncertainty.

### ***Updates to relevant policies***

- 7.103 By implementing new policies and revising existing ones outlined in the adopted Local Plan, the Local Plan Update Consultation document reinforces its commitment to safeguarding and improving the district's land, soil, and water resources.
- 7.104 Firstly, the new 'Sustainable Development' theme introduces several new policies that are designed to protect the district's existing LSW resources. Specifically, Policy SD1 Sustainable Development explicitly specifies that, where possible, development should avoid the best and most versatile land; this represents an improvement from the adopted Local Plan, which does not include references to protecting this resource. Also under this theme are Policies SD2 The Climate and Ecological Emergencies and SD3 The Cotswold Design Code (formerly Policy EN2), which outline principles that new developments should follow, including the need to maximise the use of renewable and recycled resources, protect the district's existing watercourses and sewers, and recognise soil's importance in mitigating climate change.
- 7.105 The other new theme, Climate Mitigation, includes further policy additions and amendments particularly relevant to protecting the district's water resources. In this respect, Policies CC5 Managing Flood Risk (formerly EN14) and CC6 Water Management Infrastructure (formerly INF8) provide additional protection to the district's existing waterways by extending the requirement for new development to include a flood risk assessment, inclusion of design measures that avoid exacerbating flood risk (such as Sustainable Urban Drainage Systems) and ensuring that water resources and water quality are not impacted adversely by new developments. Policy CC2 Renewable and Low Carbon Energy Generation, Storage and Transmission also specifies that developments for renewable energy projects will only be acceptable if they do not result in significant adverse impacts on water quality.

### **Updated Appraisal Summary**

<b>Likely Significant Effect</b>	<b>Effect Dimensions</b>	<b>Recommendations / mitigation</b>	<b>Comparison to Original Appraisal</b>
Enhancements to water quality in the district.	Direct, long-term, and positive.	None proposed.	Increase in positive effects.
Sustainable water management.	Direct, long-term, and positive.	None proposed.	Increase in positive effects.
Development avoids the district's best and most versatile land	Direct, long-term, and positive.	None proposed.	Increase in positive effects.

## 8. Next steps

- 8.1 This IIA Report accompanies the current Regulation 18 consultation on the Cotswold District Local Plan Update (*Local Plan Update Consultation*, February 2024).
- 8.2 Following the receipt of responses on this Regulation 18 consultation, the updates to the Local Plan will be refined and the Local Plan Update released by Cotswold District Council for Regulation 19 consultation with a full IIA Report.
- 8.3 Prior to Regulation 19 consultation, additional reasonable alternatives work will be undertaken through the IIA process, which will consider a range of more detailed growth strategy options. This is with a view to understanding the relative sustainability merits of different potential spatial strategies for the Local Plan Update. These growth strategy options will be developed based on strategic variables associated with the following two components: different scales of growth; and different locations of growth. The development of the growth strategy options will draw on the outcomes of the evidence base studies undertaken for the update process for the Local Plan to date, including, in particular, the findings of Cotswold District Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) Review.
- 8.4 Regulation 19 consultation on the pre-submission draft Local Plan is anticipated to take place in autumn 2024. Once the period for representations on the Regulation 19 version of the Local Plan document / IIA Report has finished, the main issues raised will be identified and summarised by Cotswold District Council, which will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the Local Plan Update will be submitted to the Secretary of State for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the IIA Report alongside it. This is anticipated to take place at the beginning of 2025.
- 8.5 At Examination, the Inspector will consider representations (alongside the IIA Report) before then reporting back. If the Inspector identifies the need for modifications to the Local Plan Update, these will be prepared (and undergo IIA) and will then be subject to consultation (with an IIA Report Addendum published alongside).
- 8.6 Once found to be 'sound', the Local Plan Update will be formally adopted by Cotswold District Council. At the time of adoption, an IIA 'Statement' must be published that sets out (amongst other elements) 'the measures decided concerning monitoring the Plan'.

