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Cotswold District Local Plan 2011-2031: Submission Draft Regulation 19 - Focussed Changes

Habitats Regulations Assessment Report

Prepared by LUC
April 2017

Project Title: Habitats Regulations Assessment of the Cotswold District Local Plan

Client: Cotswold District Council

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1 Introduction

- 1.1 Cotswold District Council is producing a new Local Plan in order to provide the policy framework for development in the District up to 2031. The Local Plan will set out policies, proposals and actions to meet the economic, social and environmental challenges facing the District over the 20 year period from 2011-2031. It will include policies to support development decisions (development management policies), place and site-specific policies and proposals including key site allocations, infrastructure requirements necessary to support the delivery of the Local Plan and a monitoring and implementation framework.
- 1.2 LUC was appointed by Cotswold District Council in October 2012 to undertake Habitats Regulation Assessment (HRA) of the emerging Local Plan¹ on its behalf. The HRA Report has been updated as the Local Plan has evolved.
- 1.3 Earlier HRA reports were prepared by LUC in relation to the Regulation 18 consultation on the Local Plan, which was split into two parts. These HRA reports related to the Local Plan Regulation 18 Consultation: Development Strategy and Site Allocations (January 2015) and the Regulation 18 Consultation on Planning Policies (October 2015). Each HRA report was published as part of the relevant consultation, which took place between January and February 2015 and November and December 2015 respectively.
- 1.4 In May 2016, an HRA Report was prepared for the Local Plan Submission Draft Regulation 19 Consultation (June 2016), which brought together the two previous HRA Reports and updated them in line with the latest Local Plan.
- 1.5 This HRA Report updates the May 2016 version, in response to a request for additional information from Natural England and Gloucestershire County Council (**Appendix 1**), and the Focussed Changes² (**Chapter 2**) to the Local Plan that Cotswold District Council is now consulting on. The latest plans on which this HRA is therefore based are the Cotswold District Local Plan 2011-2031: Submission Draft Regulation 19³ and its Focussed Changes (November 2016).
- 1.6 The findings of the HRA work undertaken previously have been drawn on during the preparation of this HRA report.
- 1.7 Consultation comments received in relation to the January 2015, October 2015, June 2016, and January 2017 HRA reports are set out in **Appendix 1** along with information about how they have been addressed.

The requirement to undertake Habitats Regulations Assessment of Development Plans

- 1.8 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010⁴ and again in 2012⁵. Therefore when preparing the Local Plan, Cotswold District Council is required by law to carry out a Habitats Regulations Assessment, although consultants can undertake the HRA on its behalf. The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan is explained in the online National Planning Practice Guidance (NPPG).

¹ At the time this was referred to as the Core Strategy which was previously being prepared.

² Cotswold District Council Local Plan 2011-2031: Submission Draft Reg. 19 Addendum – Draft for Consultation, November 2016.

³ Hereafter referred to as the Submission Draft (Reg. 19).

⁴ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version.

⁵ The Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927.

- 1.9 The HRA refers to the assessment of the potential effects of a development plan on one or more European Sites, including Special Protection Areas and Special Areas of Conservation:
- SPAs are classified under the European Council Directive 'on the conservation of wild birds' (79/409/EEC; 'Birds Directive') for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species).
 - SACs are designated under the Habitats Directive and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance.
- 1.10 Currently, the Government also expects potential SPAs (pSPAs), candidate SACs (cSACs) and Ramsar sites to be included within the assessment⁶.
- Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- 1.11 For ease of reference during HRA, these three designations are collectively referred to as European sites, despite Ramsar designations being at the wider international level.
- 1.12 The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex 1 habitats, Annex 11 species, and Annex 1 bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle - where uncertainty or doubt remains, an adverse impact should be assumed.

Stages of the Habitats Regulations Assessment

- 1.13 **Table 1.1** below summarises the stages involved in carrying out a full HRA, based on various guidance documents^{7,8}

Table 1.1 Stages in HRA

| Stage | Task | Outcome |
|--|--|--|
| Stage 1: Screening (the 'Significance Test') | Description of the plan. Identification of potential effects on European Sites. Assessing the effects on European Sites (taking into account potential mitigation provided by other policies in the plan). | Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2. |
| Stage 2: Appropriate Assessment (the 'Integrity Test') | Gather information (plan and European Sites). Impact prediction. Evaluation of impacts in view of conservation objectives. Where impacts considered to affect qualifying features, identify alternative options. Assess alternative options. If no alternatives exist, define and evaluate mitigation | Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all |

⁶ *Planning Policy Statement 9: Biodiversity and Geological Conservation*. OPDM, 2005.

⁷ *The HRA Handbook*. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/>

⁸ *Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents*. Department for Communities and Local Government (DCLG), August 2006.

| Stage | Task | Outcome |
|---|---|---|
| | measures where necessary. | alternatives and mitigation measures have been considered proceed to Stage 3. |
| Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation | Identify 'imperative reasons of overriding public interest' (IROPI). Identify potential compensatory measures. | This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous. |

- 1.14 In assessing the effects of the Cotswold District Local Plan in accordance with Regulation 102 of the Conservation of Habitats and Species Regulations 2010, there are potentially two tests to be applied by the competent authority: a 'Significance Test' followed if necessary by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:
- Step 1: Under Reg. 102(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
 - Step 2: Under Reg. 102(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test'). *[These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.]* If Yes –
 - Step 3: Under Reg. 102(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 102(2) to consult Natural England, and optional under Reg. 102(3) to take the opinion of the general public. *[This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1 above.]*
 - Step 4: In accordance with Reg.102(4), but subject to Reg.103, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.
- 1.15 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission.
- 1.16 The HRA should be undertaken by the 'competent authority' - in this case Cotswold District Council, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body⁹ in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Structure of the HRA Report

- 1.17 This chapter has introduced the requirement to undertake HRA of the Cotswold District Local Plan. The remainder of the report is structured as follows:
- **Chapter 2: The Cotswold District Local Plan** summarises the content of the Submission Draft (Reg. 19) and the Focussed Changes (November 2016), which are the subject of this

⁹ Regulation 5 of *The Conservation of Habitats and Species Regulations 2010*. HMSO Statutory Instrument 2010 No. 490.

report, and describes how the current consultation builds on the earlier stages of Local Plan preparation.

- **Chapter 3: HRA Screening Methodology** sets out the approach used and the specific tasks undertaken during the screening stage of the HRA.
- **Chapter 4: HRA Screening Assessment of the Submission Draft (Reg. 19) and Focussed Changes** summarises the findings of the screening stage of the HRA and describes whether significant effects on European sites are likely to result from the implementation of the Submission Draft (Reg. 19) and its Focussed Changes.
- **Chapter 5: Appropriate Assessment** describes the work undertaken during the Appropriate Assessment stage of the HRA and summarises the findings.
- **Chapter 6: Conclusions** summarises the overall HRA conclusions for the Submission Draft (Reg. 19) and describes the next steps to be undertaken.

2 The Cotswold District Local Plan 2011-2031: Submission Draft Regulation 19 and its Focussed Changes

- 2.1 The Local Plan Submission Draft (Reg. 19) brings together the development strategy and site allocations, and the planning (development management) policies that were previously consulted on separately.
- 2.2 A Regulation 18 consultation was undertaken on the Local Plan Development Strategy and Site Allocations in early 2015. That consultation addressed issues including the amount of housing and employment development that would take place in Cotswold District and the strategy for its geographical distribution. Strategic policies to guide development across the District were also set out.
- 2.3 A further Regulation 18 Consultation: Planning Policies (November 2015) invited comments to be made on emerging non-strategic policies, also known as Development Management policies, which will be used by Cotswold District Council to assess planning applications. These policies will assist in the delivery of the Local Plan objectives which were previously consulted on in May 2013 (Preferred Development Strategy) and January 2015 (Development Strategy and Site Allocations).
- 2.4 The Submission Draft (Reg. 19) version of the Local Plan aims to draw together the two parts of the Local Plan into a comprehensive Submission Draft document and was made available for consultation between June and August 2016. Representations made in respect of the earlier consultations were taken into account in preparing the Submission Draft document.
- 2.5 Following completion of the Regulation 19 consultation, Cotswold District Council has prepared a number of Focussed Changes which have been issued for consultation in November 2016 as an addendum to the Submission Draft (Reg. 19).
- 2.6 Section 4 of the Submission Draft (Reg. 19) sets out the overarching Vision for Cotswold District, and Section 5 presents Strategic Objectives that will help deliver the Vision and guide development in the District.
- 2.7 Local Plan policies are then presented within the following sections:
 - Local Plan Strategy
 - Delivering the Strategy
 - Housing to Meet Local Needs
 - Economy, including Retailing and Tourism
 - Design
 - Natural and Historic Environment
 - Infrastructure
 - Spatial Issues
- 2.8 The Focussed Changes, published as the Cotswold District Local Plan 2011-2031: Submission Draft Regulation 19 Addendum – Draft for Consultation, are set out such that the proposed change to the wording of the Local Plan is given for each Focussed Change. For each Focussed Change, tables set out a reference number for the Focussed Change, the relevant policy or paragraph number from the Submission Draft (Reg. 19), the proposed change, and the reason for the change.

Potential impacts of the Local Plan on European sites

2.9 **Table 2.1** below sets out the range of potential impacts that development in general and related activities may have on European sites.

Table 2.1 Potential Impacts and Activities Adversely Affecting European Sites

| Broad categories and examples of potential impacts on European sites | Examples of activities responsible for impacts |
|---|--|
| Physical loss <ul style="list-style-type: none"> Removal (including offsite effects, e.g. foraging habitat) Mine collapse Smothering Habitat degradation | Development (e.g. housing, employment, infrastructure, tourism) Infilling (e.g. of mines, water bodies) Alterations or works to disused quarries Structural alterations to buildings (bat roosts) Afforestation Tipping Cessation of or inappropriate management for nature conservation |
| Physical damage <ul style="list-style-type: none"> Sedimentation / silting Prevention of natural processes Habitat degradation Erosion Trampling Fragmentation Severance / barrier effect Edge effects Fire | Flood defences Dredging Mineral extraction Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving) Development (e.g. infrastructure, tourism, adjacent housing etc.) Vandalism Arson Cessation of or inappropriate management for nature conservation |
| Non-physical disturbance <ul style="list-style-type: none"> Noise Vibration Visual presence Human presence Light pollution | Development (e.g. housing, industrial) Recreation (e.g. dog walking, water sports) Industrial activity Mineral extraction Navigation Vehicular traffic Artificial lighting (e.g. street lighting) |
| Water table/availability <ul style="list-style-type: none"> Drying Flooding / stormwater Water level and stability Water flow (e.g. reduction in velocity of surface water) Barrier effect (on migratory species) | Water abstraction Drainage interception (e.g. reservoir, dam, infrastructure and other development) Increased discharge (e.g. drainage, runoff) |
| Toxic contamination <ul style="list-style-type: none"> Water pollution Soil contamination Air pollution | Agrochemical application and runoff Navigation Oil / chemical spills Tipping Landfill Vehicular traffic Industrial waste / emissions |
| Non-toxic contamination <ul style="list-style-type: none"> Nutrient enrichment (e.g. of soils and water) Algal blooms Changes in salinity Changes in thermal regime Changes in turbidity Air pollution (dust) | Agricultural runoff Sewage discharge Water abstraction Industrial activity Flood defences Navigation Construction |

| Broad categories and examples of potential impacts on European sites | Examples of activities responsible for impacts |
|--|---|
| Biological disturbance <ul style="list-style-type: none"> • Direct mortality • Out-competition by non-native species • Selective extraction of species • Introduction of disease • Rapid population fluctuations • Natural succession | Development (e.g. housing areas with domestic and public gardens) Predation by domestic pets Introduction of non-native species (e.g. from gardens) Fishing Hunting Agriculture Changes in management practices (e.g. grazing regimes, access controls, cutting/clearing) |

Review of proposed Focussed Changes

- 2.10 The Focussed Changes proposed in the Cotswold District Local Plan 2011-2031: Submission Draft Regulation 19 Addendum have been reviewed. The types of changes that would be considered to have the potential to affect the HRA findings are those which:
- Add or remove an allocated site from the proposals;
 - Alter the overall quantum or distribution of housing or employment development;
 - Provide additional or reduced mitigation for impacts on European sites; or
 - Otherwise alter the risk of physical damage, loss of habitat, non-physical disturbance, air pollution, recreation impacts or water quantity and quality impacts.
- 2.11 Those that have the potential to alter the findings of the HRA Report are summarised in **Table 2.2**, below.

Table 2.2 Focussed Changes with the potential to affect the HRA findings

| Policy or paragraph (Reg 19 reference) | Proposed Focussed Change | How HRA could be affected |
|--|---|--|
| Policy S1: Cirencester Town | Additional mixed use site: Brewery Car Park (new site reference CIR_E16A) – retail led development. Removes reference to strategic site at Chesterton (covered by Policy S2) | Additional site was previously covered by Policy S3F Redevelopment of town centre, so no additional development is proposed as a result of this change. |
| Policy S3A: Cirencester Town Centre – Retail and Main Town Centre Uses | A change in the quantum of retail development permitted within the town centre from 1,300 sqm convenience goods and 5,600 sqm comparison goods, to 400 sqm convenience goods and 2,100 sqm comparison goods. This reduces the overall allowance to about one third of the previous allowance. | This change reduces the quantum of additional retail permitted within Cirencester town centre. |
| Chapter 9: The Built, Natural and Historic Environment | Revises the structure of the Natural and Historic Environment chapter. | Policy numbers and titles have changed and need to be updated (see Table 2.3). |
| Policy EN7: Biodiversity and Geodiversity – Designated Sites | Previous wording “Internationally designated wildlife sites... will be safeguarded from development that could adversely affect them” changed to “...will be safeguarded from development that could cause a significant effect that would adversely affect their integrity.” The Focussed Change renames this policy EN9. | The change provides more explicit protection for European sites and their qualifying features. |
| Policy INF8 Managing Flood Risk | Split this into ‘Policy INF8 Water Management Infrastructure’ and ‘Policy EN14: Managing Flood Risk’ (moved to Built, Natural and | Focussed Change Policy EN14 provides some additional strength to the mitigation provided by |

| Policy or paragraph (Reg 19 reference) | Proposed Focussed Change | How HRA could be affected |
|--|--|--|
| | Historic Environment chapter) and adds explanatory text. | <p>policies EN6 (proposed EN8) and INF7 as it encourages multi-functional SuDS with wider green infrastructure benefits.</p> <p>Focussed Changes Policy INF8 recognises that controlling the effect of Phosphates on watercourses is partly beyond the scope of the Local Plan but seeks to minimise impacts as far as possible within its scope, by reducing demand for water (and therefore treatment), which would also reduce impacts relating to water abstraction.</p> |

- 2.12 The effect of each of these Focussed Changes has been considered within the HRA screening matrix (Appendix 4), alongside an assessment of the original wording of the policy or paragraph.
- 2.13 The screening matrix lists the policies as they are presented within the Local Plan Submission Draft Regulation 19 and indicates where the Focussed Changes would result in changes to their policy number, title or description. Table 2.3 provides a comparison of the original and revised titles, for those policies that have changed.

Table 2.3 Proposed changes to policy titles

| Submission Draft Regulation 19 title | Focussed Changes title |
|--|--|
| DS3: Residential Development Outside Principal Settlements | DS3: Residential Development in Non-Principal Settlements |
| H2: Affordable Housing in Principal Settlements | H2: Affordable Housing |
| H3: Affordable Housing Outside Principal Settlements | H3: Rural Exception Sites |
| EC7: Retail Hierarchy | EC7: Retail |
| D1: Design | EN2: The Built Environment |
| EN1: Natural and Historic Environment | EN1: Built, Natural and Historic Environment |
| EN2: The Wider Natural and Historic Environment | EN4: The Wider Natural and Historic Environment |
| EN3: Cotswolds AONB | EN5: Cotswolds AONB |
| EN4: Special Landscape Areas | EN6: Special Landscape Areas |
| EN5: Trees, Hedgerows and Woodlands | EN7: Trees, Hedgerows and Woodlands |
| EN6: Biodiversity and Geodiversity: Features, Habitats and Species | EN8: Biodiversity and Geodiversity: Features, Habitats and Species |
| EN7: Biodiversity and Geodiversity: Designated Sites | EN9: Biodiversity and Geodiversity: Designated Sites |
| EN8: Designated Heritage Assets: Conservation | EN11: Designated Heritage Assets: |

| Submission Draft Regulation 19 title | Focussed Changes title |
|--|---|
| Areas | Conservation Areas |
| EN9: Conversion of Non-Domestic Heritage Buildings (Designated and Non-Designated Heritage Assets) | EN13: Conversion of Non-Domestic Heritage Buildings (Designated and Non-Designated Heritage Assets) |
| - | EN10 Designated Heritage Assets |
| EN10: Non-Designated Heritage Assets | EN12: Non-Designated Heritage Assets |
| EN11: Pollution and Contaminated Land | EN15: Pollution and Contaminated Land |
| EN12: Local Green Spaces | EN3: Local Green Spaces |
| INF8: Managing Flood Risk and the Water Environment | INF8: Water Management Infrastructure EN14: Managing Flood Risk |

3 HRA Screening Methodology

- 3.1 HRA Screening of the Submission Draft (Reg. 19) has been undertaken in line with current available guidance and to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the screening stage of the HRA are described in detail below.
- 3.2 As described in **Chapter 1**, HRA work has previously been undertaken in relation to the Regulation 18 Consultation version of the Development Strategy and Site Allocations for the Local Plan, and the Regulation 18 Consultation on Planning Policies. The findings of that work were presented in the January 2015 and October 2015 HRA Reports. Prior to that, the Preferred Development Strategy for the Local Plan was subject to HRA screening in 2013. The same broad approach has been taken to the screening of the Submission Draft (Reg. 19) (as described below); however certain tasks involved, such as identifying the European sites within and around the District, did not need to be undertaken again as the findings from the earlier stages remain valid.

Identification of European sites which may be affected by the Local Plan and the factors contributing to and defining the integrity of these sites

- 3.3 An initial investigation was undertaken to identify European sites within or adjacent to the Cotswold District boundary which may be affected by the Local Plan. This involved the use of GIS data to map the locations and boundaries of European sites using publicly available data from Natural England. All European sites lying partially or wholly within 15km from the District boundary were included in order to address the fact that Local Plan policies may affect European sites which are located outside the administrative boundary of the plan. This distance has generally been considered reasonable in other local authority HRAs to ensure that all designated sites that could potentially be affected by development are identified and included in the assessment.
- 3.4 For some local authorities, there is the possibility that sites beyond the 15km distance could be affected by development within a district, for example where the water resources used to supply the district come from a source that lies further afield which is subject to European designation. With respect to Cotswold District the potential for significant effects on European sites beyond the 15km distance is considered unlikely, although if information obtained during any stage of the HRA indicates that European sites beyond the 15km buffer may be affected by development within the District, those sites will be incorporated into the assessment.
- 3.5 Eight European sites were identified within 15km of Cotswold District. The majority lie completely outside of the District boundary - only North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC lie adjacent to and very slightly within Cotswold District, in the south and west respectively. The eight European sites within 15km of Cotswold District are listed in **Table 3.1** below and are mapped in **Figure 3.1** at the end of this section.

Table 3.1 European Sites within the Cotswold District Boundary (+15km)

| Special Areas of Conservation (SACs) | Special Protection Areas (SPAs) | Ramsar Sites |
|--------------------------------------|---------------------------------|----------------|
| Severn Estuary | Severn Estuary | Severn Estuary |
| North Meadow and Clattinger Farm | | |
| Rodborough Common | | |
| Cotswold Beechwoods | | |
| Dixton Wood | | |
| Bredon Hill | | |

- 3.6 The attributes of these sites which contribute to and define their integrity have been described (see **Appendix 2**). In doing so, reference was made to Standard Data Forms for SACs and SPAs¹⁰ as well as Natural England's Site Improvement Plans¹¹. This analysis enabled European site interest features to be identified, along with the features of each site which determine site integrity and the specific sensitivities and threats facing the site. This information was then used to inform an assessment of how the potential impacts of the Local Plan may affect the integrity of the site in question.

Assessment of 'likely significant effects' of the Local Plan

- 3.7 As required under Regulation 102 of the Conservation of Habitats and Species Regulations 2010¹² an assessment of the 'likely significant effects' of the Local Plan has been undertaken. A screening matrix has been prepared in order to assess which policies and site allocations would be likely to have a significant effect on European sites. The findings of the screening assessment are summarised in **Chapter 4** and the full matrix can be found in **Appendix 4**.
- 3.8 A risk-based approach involving the application of the precautionary principle was adopted in the assessment, such that a conclusion of 'no significant effect' was only reached where it was considered very unlikely, based on current knowledge and the information available, that a policy or site allocation would have a significant effect on the integrity of a European site.

Interpretation of 'likely significant effect'

- 3.9 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.
- 3.10 In the Waddenzee case¹³, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:
- An effect should be considered 'likely', *"if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site"* (para 44).
 - An effect should be considered 'significant', *"if it undermines the conservation objectives"* (para 48).
 - Where a plan or project has an effect on a site *"but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned"* (para 47).
- 3.11 An opinion delivered to the Court of Justice of the European Union¹⁴ commented that:

¹⁰ These were obtained from the Joint Nature conservation Committee and Natural England websites (www.jncc.gov.uk and www.naturalengland.org.uk)

¹¹ Natural England is in the process of compiling Site Improvement Plans for all Natura 2000 sites in England as part of the Improvement programme for England's Natura 2000 sites (IPENS).

¹² SI No. 2010/490

¹³ ECJ Case C-127/02 "Waddenzee" Jan 2004.

¹⁴ Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

“The requirement that an effect in question be ‘significant’ exists in order to lay down a de minimus threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

- 3.12 This opinion (the ‘Sweetman’ case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered ‘trivial’ or *de minimus*; referring to such cases as those “which have no appreciable effect on the site”. In practice such effects could be screened out as having no likely significant effect; they would be ‘insignificant’.

Mitigation provided by the Local Plan

- 3.13 Some of the potential effects of the Cotswold Local Plan could be mitigated through the implementation of other proposals in the Local Plan itself, such as those relating to the provision of improved sustainable transport links (which would help to mitigate potential increases in air pollution associated with increased vehicle traffic) and the provision of green infrastructure within new developments (which would help mitigate increased pressure from recreation activities at European sites). The extent to which mitigation may be achieved through the Local Plan was considered during the screening process and has influenced the screening conclusions (see **Appendix 4** and **Chapter 4**).

Screening assumptions and information used in reaching conclusions about likely significant effects

- 3.14 During the screening stage of the HRA, each policy was screened individually, which is consistent with current guidance. For some types of impacts, screening for likely significant effects has been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, during the screening stage a number of assumptions have been applied in relation to assessing the likely significant effects on European sites that may result from the Local Plan, as described below. These assumptions have been informed by the information gathered during the earlier HRA work where appropriate.

Physical damage/loss of habitat

- 3.15 Any development resulting from the Local Plan would take place within Cotswold District; therefore only those European sites within the District boundary can be affected through physical damage or loss of habitat from within their boundaries. As such, this potential effect only needed to be considered in relation to North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie adjacent to and slightly within the District boundary.
- 3.16 Loss of habitat from outside the boundaries of a European site could still have an effect on site integrity if that habitat supports qualifying species from within the European sites, for example habitat that is used for foraging or roosting by qualifying bird species. A number of the European sites within 15km of Cotswold District include transient species amongst their qualifying features; however in all cases the sites are not close enough to the District boundary for effects relating to offsite habitat loss to be a concern, given the nature of the qualifying species.
- 3.17 **Therefore, likely significant effects relating to physical loss of or damage to habitat need to be considered only in relation to North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC, and in both cases only in relation to onsite habitat.**

Noise, vibration and light pollution

- 3.18 Noise and vibration effects, e.g. during the construction of new housing or employment development, are most likely to disturb bird species and are thus a key consideration with respect

to European sites where birds are the qualifying features, although such effects may also impact upon some mammals and fish species. Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) is most likely to affect bat populations, and therefore have an adverse effect on the integrity of European sites where bats are a qualifying feature. It has been assumed that the effects of noise, vibration and light are most likely to be significant within a distance of 500 metres. There is also evidence of 300 metres being used as a distance up to which certain bird species can be disturbed by the effects of noise¹⁵; however, it has been assumed (on a precautionary basis) that the effects of noise, vibration and light pollution are most likely to cause an adverse effect if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances, or mapped off-site breeding, foraging or roosting areas.

- 3.19 Therefore, these potential effects needed to be considered only in relation to Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as the other European sites all lie well over 500m from the District boundary, within which all development resulting from the Local Plan would take place. However, the HRA work that was undertaken previously in relation to the Regulation 18 consultation on the Development Strategy and Site Allocations for the Local Plan (and which was subject to consultation with Natural England) concluded during the Appropriate Assessment that likely significant effects on North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC were able to be ruled out as the qualifying features of both SACs are habitats which are not vulnerable to noise, vibration or light pollution. On the basis of that conclusion, **likely significant effects from noise, vibration and light pollution are able to be screened out in relation to the HRA of the Submission Draft Local Plan for all European sites.**

Air pollution

- 3.20 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by any deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen availability that can then affect plant health, productivity and species composition.
- 3.21 In terms of vehicle traffic, nitrogen oxides (NO_x, i.e. NO and NO₂) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_x can cause eutrophication of soils and water.
- 3.22 Based on the Highways Agency Design for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 1¹⁶ (which was produced to provide advice regarding the design, assessment and operation of trunk roads (including motorways)), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.
- 3.23 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the screening stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:
- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
 - Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
 - Daily average speed will change by 10 km/hr or more; or
 - Peak hour speed will change by 20 km/hr or more; or
 - Road alignment will change by 5 m or more.
- 3.24 Traffic forecast data (based on the planned level of growth) are therefore needed to determine if increases in vehicle traffic in and around Cotswold District are likely to be significant; however this information is not currently available on a district-wide basis. The Council has commissioned

¹⁵ *British Wildlife Magazine*. October 2007.

¹⁶ *Design Manual for Road and Bridges*. Highways Agency. <http://dft.gov.uk/ha/standards/dmr/index.htm>

a Transport Assessment to be undertaken; however this work has focused on capacity at a number of key junctions, none of which are within close proximity of the European sites being considered in this HRA. Information about likely increases in AADT along particular routes is not currently available.

- 3.25 It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.
- 3.26 The European sites in and around Cotswold District that are within 200m of strategic roads are:
- Rodborough Common SAC (within 200m of the A46).
 - Cotswold Beechwoods SAC (within 200m of the A46).
 - North Meadow and Clattinger Farm SAC (within 200m of the A419).
- 3.27 The Appropriate Assessment work that was undertaken previously in relation to the Regulation 18 consultations on the Development Strategy and Site Allocations and the Planning Policies concluded that there was uncertainty about the potential for impacts on these sites, until more detailed traffic forecasting data becomes available. Data on the expected increase in traffic due to the Local Plan proposals is unavailable; therefore, **likely significant effects relating to increased air pollution resulting from the Submission Draft Local Plan are not able to be screened out in relation to Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC. Likely significant effects are able to be screened out in relation to the other European sites in Cotswold District (+15km).**

Impacts of recreation

- 3.28 Recreation activities and human presence can have an adverse impact on the integrity of a European site as a result of erosion and trampling or general disturbance. Where Local Plan policies are likely to result in an increase in the local population, or where an increase in visitor numbers to the area is considered likely, the potential for an increase in visitor numbers and the associated potential impacts at sensitive European sites was identified in the screening matrix.
- 3.29 It is recognised that those European sites within and closest to the District are most likely to be affected by proposals in the Local Plan in relation to increased recreation pressure. In its consultation response to the HRA of the Development Strategy and Site Allocations document in 2015, Natural England noted that recreational pressure is a potential risk for North Meadow and Clattinger Farm Special Area of Conservation (SAC), Cotswold Beechwoods SAC and Rodborough Common SAC.
- 3.30 **However, at this stage of the assessment the broad potential for this type of impact to affect any of the European sites within Cotswold District (+15km) was recorded.**

Water quantity and quality

- 3.31 The Appropriate Assessment work that was undertaken previously in relation to the Regulation 18 Consultation on the Local Plan Development Strategy and Site Allocations concluded that the qualifying violet click beetle of Dixton Wood SAC and Bredon Hill SAC are not vulnerable to changes in water quality and quantity; however the qualifying features of North Meadow and Clattinger Farm SAC, Cotswold Beechwoods SAC, Rodborough Common SAC and Severn Estuary SAC, SPA and Ramsar site are all potentially vulnerable to changes in water quality and/or quantity. In particular, Natural England's Site Improvement Plan for North Meadow and Clattinger Farm SAC identifies inappropriate water levels and water pollution as two of the key priority concerns for the SAC, with these issues having been compounded by unseasonal flood events in the last six years. At the time that the Appropriate Assessment work for the Development Strategy and Site Allocations was carried out, uncertainty remained over the potential for adverse effects on the integrity of those sites as a result of changes to water quality and quantity, due to a lack of up to date evidence about the impacts of the growth proposed through the Local Plan.
- 3.32 By the time that the HRA work for the Regulation 18 consultation on the Planning Policies was undertaken in October 2015, up to date information about water availability in the District and the available capacity at sewage treatment works to serve new development had been published in

the Cotswold District Water Cycle Study¹⁷. The study concludes that there are no issues which indicate that the planned scale, location and timing of development within the District is unachievable from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters. **Therefore, likely significant effects on European sites in relation to water quality and quantity are able to be screened out in relation to the Submission Draft Local Plan.**

Summary of screening assumptions

- 3.33 **Table 3.2** below summarises the screening assumptions that are being applied to the HRA of the Submission Draft Local Plan Regulation 19 consultation. Where certain types of effects are screened out in **Table 3.2**, they did not need to be considered further so are not referred to in the screening matrix in **Appendix 4**.

Table 3.2 Summary of screening assumptions

| | Physical damage/loss of habitat | Noise, vibration and light pollution | Air pollution | Impacts of recreation | Water quantity and quality |
|--------------------------------------|---------------------------------|--------------------------------------|---------------|-----------------------|----------------------------|
| North Meadow and Clattinger Farm SAC | Screened in (onsite only) | Screened out | Screened in | Screened in | Screened out |
| Rodborough Common SAC | Screened out | Screened out | Screened in | Screened in | Screened out |
| Cotswold Beechwoods SAC | Screened in (onsite only) | Screened out | Screened in | Screened in | Screened out |
| Dixton Wood SAC | Screened out | Screened out | Screened out | Screened in | Screened out |
| Bredon Hill SAC | Screened out | Screened out | Screened out | Screened in | Screened out |
| Severn Estuary SAC | Screened out | Screened out | Screened out | Screened in | Screened out |
| Severn Estuary SPA | Screened out | Screened out | Screened out | Screened in | Screened out |
| Severn Estuary Ramsar site | Screened out | Screened out | Screened out | Screened in | Screened out |

Identification of other plans and projects which may have 'in-combination' effects

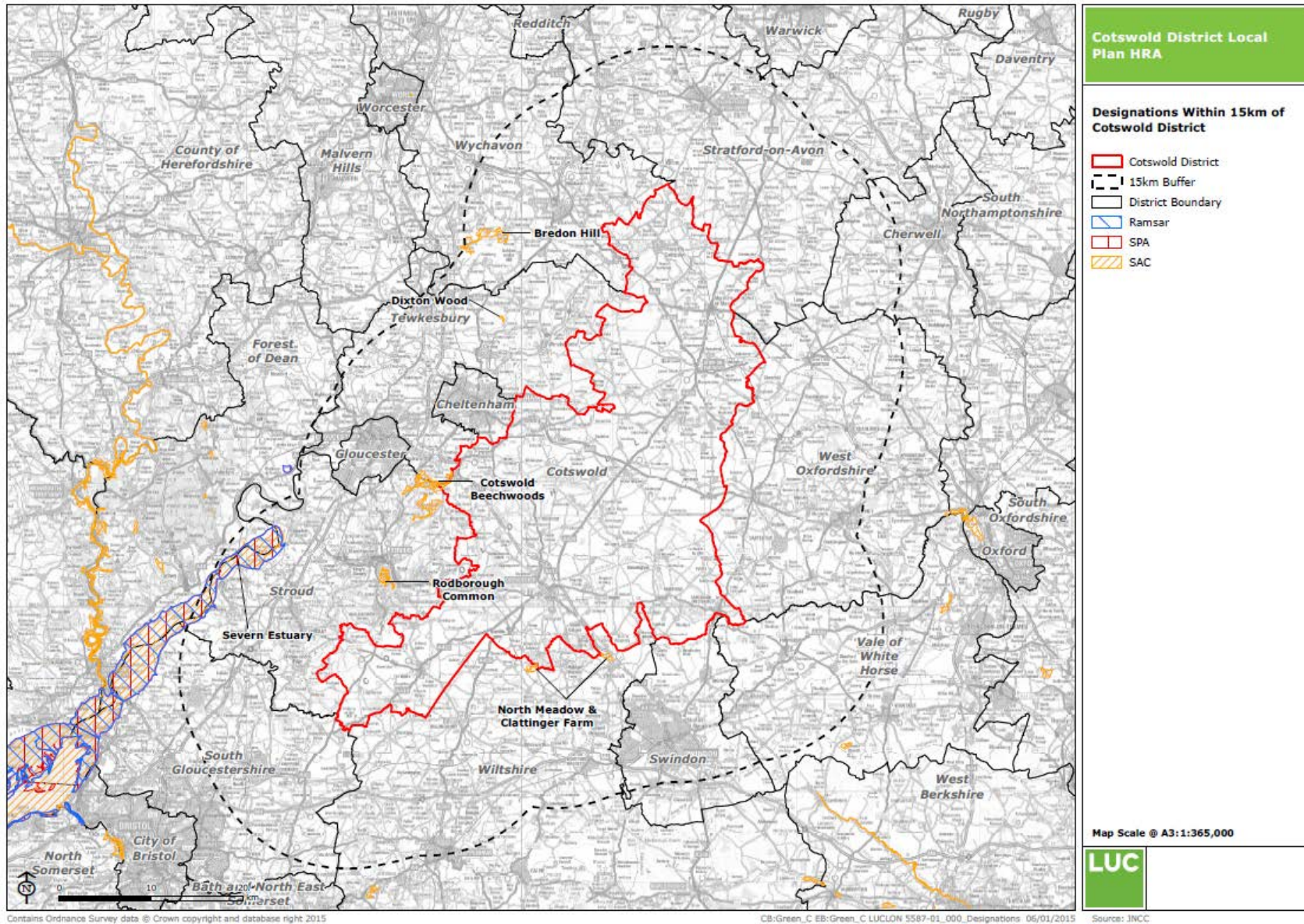
- 3.34 Regulation 102 of the Amended Habitats Regulations 2010 requires an Appropriate Assessment where 'a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site'. The purpose of the in-combination effects assessment is to make sure that the effects of numerous small activities, which alone would not result in a significant effect, are assessed to determine whether their combined effect would be significant. It is therefore necessary to focus the assessment of in-combination effects on those elements of the plan that are not considered to have significant effects on their own.
- 3.35 The first stage in identifying 'in-combination' effects involves identifying which other plans and projects in addition to the Cotswold District Local Plan may affect the eight European sites that were the focus of this assessment. There are a large number of potentially relevant plans and projects which could be considered; therefore the review at this stage focused on planned spatial growth within the authorities adjacent to Cotswold District as these are the ones most likely to give rise to in-combination effects. **Appendix 3** lists the plans that were considered, outlining

¹⁷ JBA Consulting (August 2015) Cotswold District Council – Water Cycle Study. Phase I Study (Incorporating Water Quality Assessment - Phase II)

the components of each that could have an impact on nearby European sites and considering the findings of the accompanying HRA work (where available).

- 3.36 The purpose of the review of other plans was to identify any components that could have an impact on the European sites that could also be affected by the Cotswold District Local Plan, e.g. proposals for development near to the European sites which could have implications in terms of increased traffic, water use and recreation pressures and infrastructure development. The potential for the effects of these plans to combine with the effects of the Cotswold District Local Plan has been considered in **Chapter 5**.

Figure 3.1 European sites within 15km of Cotswold District



4 HRA Screening Assessment of the Submission Draft (Reg. 19) and Focussed Changes

4.1 As described in **Chapter 3**, a screening assessment was carried out in order to identify the likely significant effects of the Submission Draft (Reg. 19) and Focussed Changes on the European sites in and around Cotswold District. The full screening matrix used for this assessment can be found in **Appendix 4** and the findings are summarised below.

Significant effects unlikely

4.2 The Vision and all six Strategic objectives as well as 44 of the 78 policies in the Submission Draft local Plan are not expected to have significant effects on European sites.

4.3 The following policies would not result in development because they either set out criteria relating to development proposed under other policies, or they seek to protect the natural environment:

- S3B: Access, Transport and Parking
- S3D: Enhancing Environmental Quality
- S3E: Green Infrastructure and Play Space
- S8: South Cerney
- S14: Upper Rissington
- S17: Mickleton
- H1: Housing Mix and Tenure to Meet Local Needs
- H2: Affordable Housing in Principal Settlements ('Affordable Housing' in Focussed Changes)
- H6: Removal of Occupancy Conditions
- EC1: Employment Development
- EC2: Safeguarding Employment Sites
- EC6: Conversion of Rural Buildings
- EC7: Retail Hierarchy
- EC8: Main Town Centre Uses
- EC9: Retail Impact Assessments
- D1: Design ('EN2: The Built Environment' in Focussed Changes)
- EN1: Natural and Historic Environment ('Built, Natural and Historic Environment' in Focussed Changes)
- EN2: The Wider Natural and Historic Landscape (EN4 in Focussed Changes)
- EN3: Cotswolds Area of Outstanding Natural Beauty (AONB) (EN5 in Focussed Changes)
- EN4: Special Landscape Areas (EN6 in Focussed Changes)
- EN5: Trees, Hedgerows and Woodlands (EN7 in Focussed Changes)
- EN6: Biodiversity and Geodiversity: Features, Habitats and Species (EN8 in Focussed Changes)
- EN8: Designated Heritage Assets: Conservation Areas (EN11 in Focussed Changes)
- EN9: The Conversion of Non-Domestic Historic Buildings (Designated and Non-Designated Heritage Assets) (EN13 in Focussed Changes)

- EN10: Non-Designated Heritage Assets (EN12 in Focussed Changes)
- Focussed Change new policy EN10: Designated Heritage Assets
- EN11: Pollution and Contaminated Land (EN15 in Focussed Changes)
- EN12: Local Green Spaces (EN3 in Focussed Changes)
- INF1: Infrastructure Delivery
- INF4: Highway Safety
- INF5: Parking Provision
- INF6: Vale of Evesham Heavy Goods Vehicle Control Zone
- INF8: Managing Flood Risk and the Water Environment (split into 'INF8: Water Management Infrastructure' and 'EN14: Managing Flood Risk' in Focussed Changes)

4.4 The following policies could result in some development, but the development arising would be located away from sensitive European sites and would not be expected to contribute significantly to increased traffic, recreation pressure or demand for water abstraction or treatment:

- SA1: Strategy Delivery - South Cotswolds Sub-Area
- SA2: Strategy Delivery - Mid-Cotswolds Sub-Area
- SA3: Strategy Delivery - North Cotswolds
- EC4: Special Policy Areas
- SP1: Cheltenham and Gloucester Green Belt
- SP2: Kemble Airfield
- SP3: Thames and Severn Canal
- SP4: The River Thames
- SP6: Former Cheltenham to Stratford Railway Line

4.5 In addition, a number of the policies would not result in development and could also help to mitigate the potential effects of development proposed elsewhere in the Local Plan as follows:

- EN7: Biodiversity and Geodiversity: Designated Sites (EN9 in Focussed Changes) – this policy states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect their integrity (the specific reference to “integrity” has been introduced in the proposed Focussed Change for this policy).
- INF3: Sustainable Transport – this policy encourages developments to promote the use of sustainable modes of transport and to reduce car use.
- INF7: Green Infrastructure – provides for the protection and enhancement of green infrastructure which may help to mitigate increases in recreation pressure at European sites.
- Focussed Changes revised policy INF8: Water Management Infrastructure recognises that controlling the effect of Phosphates on watercourses is partly beyond the scope of the Local Plan but seeks to minimise impacts as far as possible within its scope, by reducing demand for water (and therefore treatment), which would also reduce impacts relating to water abstraction.
- Focussed Changes new policy EN14: Managing Flood Risk provides some additional strength to the mitigation provided by policies EN6 (proposed EN8) and INF7 as it encourages multi-functional SuDS with wider green infrastructure benefits.

4.6 The following policies could result in some infrastructure development which could in theory result in the loss of or damage to habitat at European sites. However, in order for this effect to occur the infrastructure would need to be located within the very small areas of the European sites that are slightly within Cotswold District. This is considered to be very unlikely and, in any event, policy EN7 (EN9 in Focussed Changes) provides robust protection for European sites (as described above). Therefore significant impacts on European sites were screened out for:

- INF9: Telecommunications Infrastructure
- INF10: Renewable and Low Carbon Energy Development

Significant effects likely or uncertain

4.7 None of the Planning Policies are considered **likely** to result in significant effects on the European sites in and around Cotswold District. However, for a number of policies it was concluded that there **may** be a significant effect on one or more European sites. Therefore, in line with the precautionary approach being applied in the HRA, until significant effects can be ruled out, they are treated as 'likely significant effects'.

4.8 The following strategic policies were highlighted as having potential but uncertain significant effects on European sites:

- DS1: Development Strategy
- DS2: Development Within Development Boundaries
- DS3: Residential Development Outside Principal Settlements ('Residential Development in Non-Principal Settlements' in Focussed Changes)
- S1: Cirencester Town
- S2: Strategic Site South of Chesterton, Cirencester
- S3: Cirencester Town Centre
- S3A: Retail and Main Town Centre Uses
- S3C: Tourism and Cultural Facilities
- S3F: Redevelopment of Town Centre Sites
- S4: Down Ampney
- S5: Fairford
- S6: Kemble
- S7: Lechlade
- S9: Tetbury
- S10: Andoversford
- S11: Bourton-on-the Water
- S12: Northleach
- S13: Stow-on-the-Wold
- S15: Blockley
- S16: Chipping Campden
- S18: Moreton-in-Marsh
- S19: Willersey
- H3: Affordable Housing Outside Principal Settlements ('Rural Exception Sites' in Focussed Changes)
- H4: Specialist Accommodation for Older People
- H5: Dwellings for Rural Workers Outside Settlements
- H7: Gypsy, Traveller and Travelling Showpeople Accommodation
- EC3: Proposals for all Types of Employment Generating Uses
- EC5: Rural Diversification
- EC10: Development of Tourist Facilities and Visitor Attractions
- EC11: Tourist Accommodation

- INF3: Social and Community Infrastructure
 - SP5: Cotswold Water Park - Post-Mineral Extraction After Use Proposals
- 4.9 These policies could result in the development of housing, Gypsy and Traveller sites, tourism-related development and/or employment land which could have significant effects in relation to **physical disturbance/loss of habitat** from development, **erosion/trampling or general disturbance** from increased recreation activities and **air pollution** from increased vehicle traffic.
- 4.10 Physical disturbance/loss of habitat could only affect the two European sites that lie adjacent to and slightly within the District boundary: **North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC**. However, for effects to occur any development resulting from the policies would need to be located within the very small areas of these European sites that lie slightly within the boundaries of Cotswold District.
- 4.11 Increased air pollution in and around the District as a result of the above policies could affect **Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC** as these sites are within 200m of the strategic road network.
- 4.12 Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect **any of the European sites in and around the District** although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their close proximity to the District.

Potential mitigation

- 4.13 As described above, policies EN7 (EN9 in Focussed Changes): Biodiversity and Geodiversity: Designated Sites, INF3: Sustainable Transport and INF7: Green Infrastructure in particular could provide mitigation for the potential effects of development on European sites and this has been reflected in the screening matrix in **Appendix 4** and has been taken into account in the screening conclusions. There are also specific provisions within a number of the policies that could provide mitigation and these are also referred to in **Appendix 4**.

5 Appropriate Assessment

- 5.1 Following the screening stage, the plan-making authority is required under Regulation 102 of the Habitats Regulations 2010 to make an 'Appropriate Assessment' of the implications of the plan for European sites, in view of their conservation objectives. The Appropriate Assessment must be undertaken where likely significant effects were identified, or were not able to be ruled out, during the screening stage. As described in the previous chapter, likely significant effects were not able to be ruled out for the Submission Draft (Reg. 19) in relation to **physical disturbance/loss of habitat** from development, erosion/trampling or general disturbance from increased **recreation** activities, and **air pollution** from increased vehicle traffic.
- 5.2 **Table 5.1** below shows which European sites could be impacted by these potential likely significant effects (LSEs).

Table 5.1 Summary of screening conclusions

| European site | Physical damage/loss of habitat | Air pollution | Impacts of recreation |
|--------------------------------------|----------------------------------|----------------------------------|----------------------------------|
| North Meadow and Clattinger Farm SAC | Uncertain whether there is a LSE | Uncertain whether there is a LSE | Uncertain whether there is a LSE |
| Rodborough Common SAC | No LSE | Uncertain whether there is a LSE | Uncertain whether there is a LSE |
| Cotswold Beechwoods SAC | Uncertain whether there is a LSE | Uncertain whether there is a LSE | Uncertain whether there is a LSE |
| Dixton Wood SAC | No LSE | No LSE | Uncertain whether there is a LSE |
| Bredon Hill SAC | No LSE | No LSE | Uncertain whether there is a LSE |
| Severn Estuary SAC | No LSE | No LSE | Uncertain whether there is a LSE |
| Severn Estuary SPA | No LSE | No LSE | Uncertain whether there is a LSE |
| Severn Estuary Ramsar site | No LSE | No LSE | Uncertain whether there is a LSE |

- 5.3 EC Guidance¹⁸ states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function.
- 5.4 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex 1 habitats, Annex II species, and Annex 1 bird populations for which it has been designated) and to ensure their continued viability. A high degree of integrity is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support. The Appropriate Assessment therefore needs to focus on those impacts judged likely to have an effect on the qualifying features of European sites, or where insufficient certainty regarding this remained at the screening stage.
- 5.5 An Appropriate Assessment has therefore been undertaken for all of the European sites in Cotswold District (+15km) where likely significant effects from the Local Plan were not able to be

¹⁸ *Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.* European Commission Environment DG, November 2001.

ruled out during the screening stage, as shown in **Table 5.1** above. The Appropriate Assessment findings are summarised in this chapter and are set out in full in **Appendix 5**.

- 5.6 The Appropriate Assessment focuses on those impacts that are judged likely to have a significant effect on the qualifying features of a European site, or where insufficient certainty regarding this remained at the screening stage. As described in **Chapter 1**, a conclusion needs to be reached as to whether or not a policy or site allocation in the Local Plan would adversely affect the integrity of a European site. In order to reach a conclusion, consideration was given to whether the predicted impacts of the proposals (either alone or in combination) have the potential to:
- Delay the achievement of conservation objectives for the site.
 - Interrupt progress towards the achievement of conservation objectives for the site.
 - Disrupt factors that help to maintain the favourable conditions of the site.
 - Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- 5.7 In order to make a judgement about the likelihood of proposals having an adverse effect on the integrity of a European site, an Appropriate Assessment matrix was drawn up (see **Appendix 5**), which considered separately each of the sites which may be affected by the Local Plan policies, allowing for the fact that the qualifying features of each site vary. The conservation objectives for each European site are generally to maintain the qualifying features in favourable condition.
- 5.8 For each European site where a potential likely significant effect was identified at the screening stage in relation to a proposal in the Local Plan the potential impacts were set out and judgements made (based on the information available) regarding whether the impact is likely to affect the integrity of the site and if mitigation measures are likely to be implemented to reduce the likelihood or severity of the potential impact. In making these judgements, the following assumptions and data sources were used in relation to the potential impacts identified at the screening stage.

Physical loss or damage to habitat

- 5.9 For damage to, or loss of, habitat it was assumed at the screening stage that effects from development could only be experienced at North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie just within the District boundary, as all other European sites that are being considered in the HRA lie too far from the District boundary to be affected in this way by development taking place within the District.
- 5.10 During the Appropriate Assessment, consideration has been given to the qualifying features of North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC and their particular sensitivity to these types of effects, as well as the potential mitigation that may help to avoid likely significant effects.

Air pollution

- 5.11 As described in **Chapter 3**, based on the Highways Agency Design for Road and Bridges Manual (DMRB)¹⁹ it is assumed that air pollution from roads is likely to be significant only up to 200 metres from the road itself. The DMRB also sets out criteria by which impacts should be screened in or out, on the basis of increases in traffic flow (AADT), vehicle speeds or road alignment. None of the sites can be screened out on this basis as there is no specific data available (e.g. traffic modelling data) that allows future traffic flows or vehicle speeds to be predicted, and proposed changes to road alignment are not known.
- 5.12 However, air pollution-related impacts were able to be ruled out for some of the European sites in and around Cotswold District at the screening stage as those sites do not lie within 200m of the strategic road network. At the screening stage the following European sites were identified as having the potential to be affected by air pollution as a result of proposals in the Local Plan, due to their proximity to strategic roads:
- Rodborough Common SAC (within 200m of the A46 Bath Road)

¹⁹ Highways Agency Design for Road and Bridges Manual Volume 11, Section 3, Part 1

- Cotswold Beechwoods SAC (within 200m of the A46)
 - North Meadow and Clattinger Farm (within 200m of the A419(T))
- 5.13 Nitrogen dioxides (NOx) are considered to be the key pollutants from traffic emissions. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.
- 5.14 Air pollution from traffic is most likely to affect European sites which have plant, soil and water habitats amongst their qualifying features but some qualifying animal species may also be indirectly affected by deterioration in habitat. Therefore, where European sites do not include species that are vulnerable to these impacts amongst their qualifying features, air pollution-related effects can be ruled out. During the Appropriate Assessment, consideration was given to the qualifying features of the above three SACs and whether they are vulnerable to increased air pollution. APIS data was also used to identify where levels of pollutants are already exceeding critical loads at the relevant European sites.
- 5.15 Where the qualifying features of a site are vulnerable to increased air pollution, consideration needs to be given to the potential for increases in traffic volume and speed on the relevant roads to be significant, and the impact that the change in vehicle emissions will have on the site's qualifying features.

Recreation pressure

- 5.16 Consideration was given to the qualifying features and characteristics of each European site and its particular vulnerability to recreation activities, including whether it is known to already be under pressure from visitors.
- 5.17 The distance between European sites and proposed development locations in Cotswold District, as well as general accessibility, was also considered and this informed judgements about the likely nature of visits (i.e. whether day-to-day activities such as dog walking might be expected to take place).

Appropriate Assessment Findings

- 5.18 As described above, for those Local Plan policies where the screening finding was a potential likely significant effect on any European site(s), the Appropriate Assessment stage of the HRA was undertaken.
- 5.19 This stage seeks to determine whether implementation of those policies alone or in combination will result in an adverse effect on the integrity of the whole European site in question (many European sites are made up of a number of fragments of habitat). It also considers the potential for in-combination effects from development proposed in neighbouring authorities' Local Plans. Consideration was given to mitigation measures that may be included in the Local Plan in order to reduce the likelihood and significance of effects on European sites.
- 5.20 The full Appropriate Assessment is set out in **Appendix 5** and the findings are summarised below by type of impact (as identified at the screening stage).

Physical loss or damage to habitat

- 5.21 At the screening stage the potential for physical loss or damage to habitat was identified in relation to **Cotswold Beechwoods SAC** and **North Meadow and Clattinger Farm SAC**. This could result from the housing proposed in 'other locations' – all of the named towns and villages where housing is allocated are located away from these SACs.
- 5.22 Only very small fragments of Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC lie within the boundary of Cotswold District, and development would need to be located within those very small areas in order to have an effect on the SACs in terms of physical loss of or damage to habitat. The tiny fragments of both SACs that extend within the District boundary are located outside of any towns or villages where development is proposed, and so could only be affected by the development resulting from policies DS3, H3, H4, H5, H7, EC3, EC5, EC10, EC11 and INF2, which could technically come forward in any part of the District. It is considered very

unlikely that such development would come forward in the location of the SACs, as the fragments within the District boundary are outside of any villages. In the case of North Meadow and Clattinger Farm SAC, the westerly part lies within an area of fragmented waterbodies.

- 5.23 Policy EN7: Biodiversity and Geodiversity: Designated Sites (EN9 in the Focussed Changes) provides general protection for European sites, as it states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect their integrity (the specific reference to “integrity” has been introduced in the proposed Focussed Change for this policy).
- 5.24 Taking account of the mitigation provided by policy EN7 (EN9 in the Focussed Changes), the Appropriate Assessment concluded that **the Local Plan will not have adverse effects on the integrity of either SAC in relation to physical loss or damage to habitat.**

Air pollution

- 5.25 At the screening stage the potential for increased air pollution from vehicle traffic to affect **Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC** was identified as these European sites all lie within 200m of the strategic road network. All three of these SACs include habitats amongst their qualifying features which are potentially vulnerable to increased air pollution.
- 5.26 Rodborough Common SAC is within 200m of the A46 on the southern side of Stroud and the qualifying semi-natural dry grassland habitat is potentially vulnerable to increased air pollution. Natural England’s Site Improvement Plan for the SAC identifies air pollution (specifically nitrogen deposition) as a key threat currently facing the SAC and APIS data for the SAC show that levels of nitrogen deposition are already exceeding critical loads. However, the stretch of the A46 that is within 200m of Rodborough Common runs south from Stroud, down towards the M4 north of Bath, and is almost entirely outside of Cotswold District, only crossing the south western part of the District. Although Stroud is one of the main areas to which residents of Cotswold District commute, the stretch of the A46 that is within 200m of Rodborough Common SAC does not connect Stroud with any of the main development locations within Cotswold District. Instead, a direct link between Cotswold District and Stroud is provided by the A419 between Cirencester and Stroud and commuter traffic from Cotswold District is considered much more likely to use that route. Furthermore, the A419 is more than 200m to the east of Rodborough Common SAC and is on the leeward side of the prevailing westerly winds, so increases in traffic along that route are not expected to affect the SAC in relation to increased air pollution. As a result of these factors, **the Appropriate Assessment concluded that the Local Plan will not have adverse effects on the integrity of Rodborough Common SAC in relation to air pollution.**
- 5.27 Cotswold Beechwoods SAC is also within 200m of the A46 and the qualifying beech forests and semi-natural dry grassland habitats are potentially vulnerable to increased air pollution. Natural England’s Site Improvement Plan for the SAC identifies air pollution (specifically nitrogen deposition) as a key threat currently facing the SAC and APIS data for the SAC show that levels of nitrogen deposition are already exceeding critical loads. However, the stretch of the A46 within 200m of Cotswold Beechwoods SAC runs between Cheltenham and Stroud, both of which (as well as this stretch of the A46) lie outside of Cotswold District. The stretch of the A46 within 200m of the SAC does not provide a link to or from any of the key development locations within Cotswold District. Therefore, this stretch of road is not considered likely to see significant increases in traffic from the development proposed in the Local Plan. As a result of these factors, **the Appropriate Assessment concluded that the Local Plan will not have adverse effects on the integrity of the Cotswold Beechwoods SAC in relation to air pollution.**
- 5.28 North Meadow and Clattinger Farm is within 200m of the A419(T). This is the main road linking Cirencester and Swindon to the south and, as Swindon is one of the main urban areas to which residents of Cotswold District commute outside of the District²⁰, the road may see an increase in vehicle traffic as a result of housing development in Cotswold District. However, this needs to be set within the context of the A419(T) acting as a major connecting route for longer distance traffic wishing to travel between the M5 (J11A) and the M4 (J15), and connecting the Birmingham

²⁰ <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462191>

conurbation with the south coast ports, such as Southampton. It is a dual carriageway for much of its length.

- 5.29 There is no specifically commissioned traffic modelling data available that calculates the increase in trips that would result from the Local Plan proposals, over the plan period (2011-2031). However, it is possible to carry out analysis of publicly available traffic data to inform the Appropriate Assessment.
- 5.30 The Department for Transport provides data on current traffic flows and the TEMPro²¹ modelling tool can be used to estimate background traffic growth factors. The nearest traffic count point to North Meadow and Clattinger Farm SAC on the A419(T) is at Cricklade²² and the most recent data available for it is from 2015. This has been used in preference to nominal start year of the Local Plan (2011) as the data are more up to date. The 2015 baseline traffic flow for the A419(T) is 40,034 AADT²³.
- 5.31 TEMPro growth factors are based on population, household, employment, GDP and car purchasing cost projections, but exclude contributions from new development. Growth factors are available at local authority level and at Middle Layer Super Output Area (MSOA – an ONS area).
- 5.32 The two major urban areas either side of North Meadow and Clattinger Farm SAC, on the A419(T), are Cirencester and Swindon. Between these two points, the road lies within three local authority areas: Cotswold District, Wiltshire County, and Swindon Borough; and three MSOAs. To determine an appropriate growth rate for the A419 between Cirencester and Swindon, an average has been taken of the growth factors for the following:
- Cotswold District;
 - MSOA Cotswold 008²⁴ – south and east Cirencester;
 - Wiltshire County;
 - MSOA Wiltshire 001²⁵ – Cricklade and Ashton Keynes;
 - Swindon Borough; and
 - MSOA Swindon 008²⁶ – Broad Blunsden and Hinton Parva.
- 5.33 Using TEMPro²⁷, an average local growth factor of 1.2230 was returned. If this is applied to the 40,034 AADT 2015 baseline flows for the A419 then traffic flows in 2031 would be an estimated 48,962 AADT; this would be an increase in AADT of 8,927 over the Local Plan period.
- 5.34 Note that these figures represent growth in traffic from all sources, not solely from Cotswold District, and are an approximate estimate only: local growth factors for the areas used range from 1.1631 to 1.2871.
- 5.35 Census data²⁸ shows that 3,691 trips were made between Cotswold District and Swindon Borough every day in that year (inflow plus outflow trips); 1,915 of those were due to residents of Cotswold District working in Swindon Borough (i.e. influenced by housing provision in Cotswold District) and 1,776 were trips from Swindon Borough into Cotswold District (i.e. influenced by employment provision in Cotswold District).
- 5.36 AADT on the A419(T) in 2001 was 30,806, therefore commuting between Cotswold District and Swindon Borough accounted for 11.9% of the total trips (6.2% from Cotswold District and 5.7% to Cotswold District). If the same proportion of trips is applied to the 2015 data, c.4,797 trips are due to commuting between Cotswold District and Swindon Borough. This assumes as a worst case

²¹ TEMPro modelling tool: <https://www.gov.uk/government/collections/tempro>

²² Count Point 27119: <http://www.dft.gov.uk/traffic-counts/cp.php?la=Wiltshire#27119>

²³ AADT and AADF are used interchangeably; the DfT data is given as AADF and includes flows for all vehicles.

²⁴ Cotswold 008 Super Output Area Middle Layer: <http://statistics.data.gov.uk/doc/statistical-geography/E02004622>

²⁵ Wiltshire 001 Super Output Area Middle Layer: <http://statistics.data.gov.uk/doc/statistical-geography/E02006644>

²⁶ Swindon 008 Super Output Area Middle Layer: <http://statistics.data.gov.uk/doc/statistical-geography/E02003219>

²⁷ The following parameters were used for the standard calculation: dataset version 70; trip ends by time period for 2015-2031; all trip purposes; car drivers only (to provide a more representative growth factor than if buses and coaches were also taken into account); average day; origin and destination. Adjusted local growth figures, to produce a growth factor for rural trunk roads were then based on NTM dataset AF15 (2010-2040).

²⁸ 2001 travel to work data (the latest data available): <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462191>

that all of this traffic uses the A419(T). A significant proportion of the remainder is likely to be through-traffic as the A419(T) is a trunk road and the major route between the M4/Swindon and M5/Gloucester.

- 5.37 The estimated AADT in 2031 shows that traffic flows along the A419(T) will increase by greater than 1,000 AADT due to anticipated growth (excluding new development), and could have a significant effect on air pollution and therefore the North Meadow and Clattinger Farm SAC. The degree to which the Cotswold Local Plan contributes or adds to this is not clear but can be assumed to be at least partially incorporated into the overall figures since these factor in matters such as overall household growth, and the Cotswold Local Plan responds to the element of growth that is relevant to the District.
- 5.38 Therefore if 11.9% is traffic generated by commuting, then those vehicles would represent c.1,062 additional vehicles (AADT), being 11.9% of 8,927. This is just over the threshold considered potentially significant in the DMRB guidance. It is likely that Cotswold District will contribute more traffic than just commuting traffic, and commuting patterns will be influenced by new housing and employment development locations and scale. However, much of the projected background growth is due to factors beyond the influence of the Local Plan. It is therefore not possible to definitively state whether the specific contribution of the Local Plan (e.g. through the provision of additional housing and employment space) will lead to a significant increase in traffic during the plan period, but it is likely that the greater contribution to a significant traffic increase will be from other local authority areas and/or due to factors beyond the control of the Local Plan, including long distance through trips which will be linked to economic conditions and journey objectives.
- 5.39 Given the above analysis, and in the absence of specific traffic modelling, it is appropriate to conclude under the precautionary principle that the contribution of air pollution from nitrogen from the Local Plan will be above the DMRB threshold. It is therefore necessary to examine the effects of resulting additional air pollution on the SAC to determine whether these would be likely to result in an adverse effect on integrity.
- 5.40 The qualifying lowland hay meadow of the SAC is potentially vulnerable to increased air pollution and APIS data²⁹ shows that nitrogen levels at the site are already exceeding critical loads, by a small margin. However, neither the standard data form for the SAC or Natural England's Site Improvement Plan for North Meadow and Clattinger Farm³⁰ identify air pollution as a key issue for the site and Natural England's 2015 Atmospheric Nitrogen Theme Plan³¹ identifies the site as being of low sensitivity to nitrogen and not exceeding critical loads for nitrogen.
- 5.41 The Site Improvement Plan does identify the site's habitats as being sensitive to nutrient enrichment, although it is pollution carried by surface water that is identified as the source of risk. Agriculture can contribute to nutrient enrichment via both waterborne and airborne pathways, and is likely to be the main source of nutrient enrichment from surface water pollution. The Atmospheric Nitrogen Theme Plan also identifies local agriculture sources of Nitrogen as being of 'medium' relevance at the site.
- 5.42 The HRA Report for Swindon's Local Plan³² (which has been found sound and adopted) considered the potential for adverse effects on the integrity of the SAC as a result of increased air pollution during the Appropriate Assessment, and concluded that air pollution is not currently having adverse effects on the site. It found that the primary source of atmospheric pollution is agricultural, with site level management being the key factor in maintaining site integrity. Therefore, it was concluded that the Swindon Local Plan would not have adverse effects on the integrity of the SAC.
- 5.43 Discussion with Natural England's Lead Advisor, Robert Howells (8 November 2016) confirmed that physical measures have recently been provided at the site to improve the ability to control flooding and thereby reduce the threat of increased nutrient enrichment in the future. However, regular flooding is a key biotic requirement of the grassland and therefore, while management of

²⁹ Baseline Nitrogen levels and critical loads: <http://www.apis.ac.uk/srcl/select-a-feature?site=UK0016372>

³⁰ Site Improvement Plan: <http://publications.naturalengland.org.uk/publication/4565167836758016>

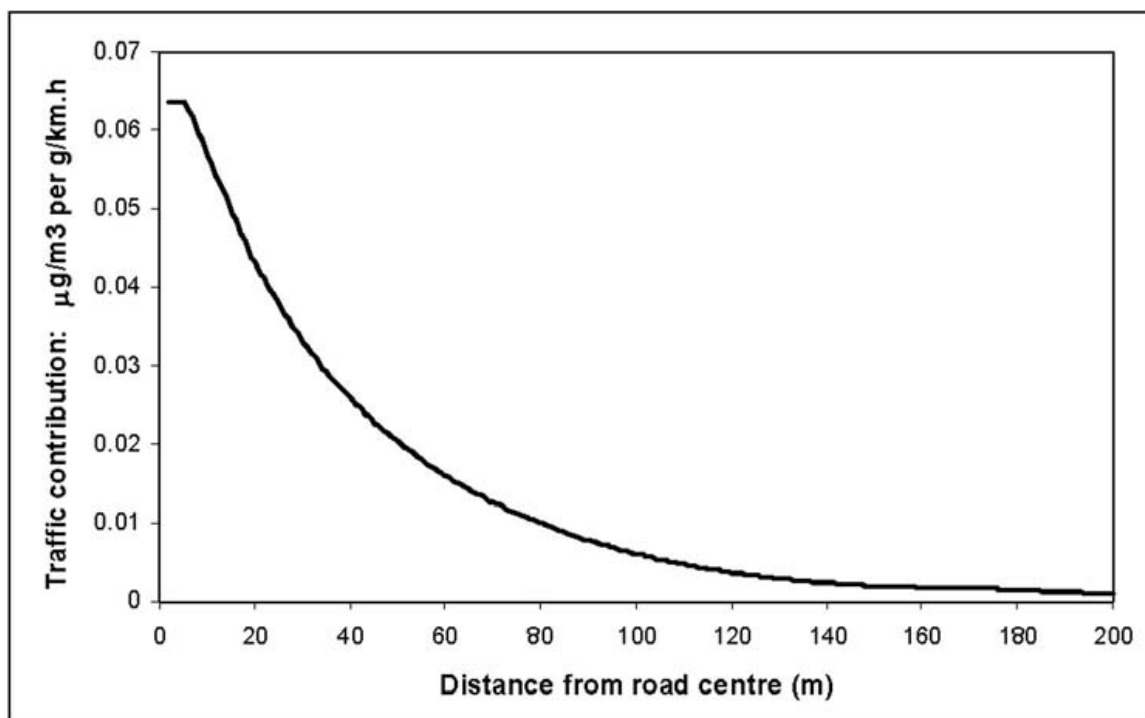
³¹ Atmospheric nitrogen theme plan: <http://publications.naturalengland.org.uk/publication/6140185886588928>

³² Swindon Borough Council (June 2013) Habitats Regulations Assessment Overview Paper: Swindon Borough Local Plan 2026 Submission.

flooding may have a part to play in avoiding and mitigating the effects of nutrient enrichment at the site, it cannot be relied upon solely to eliminate this threat.

- 5.44 The entire Site of Special Scientific Interest (SSSI) that makes up the SAC is currently reported as being in favourable condition. 12 indicator species (for National Vegetation Classification community MG4) are present and no adverse factors associated with nutrient enrichment are reported. Natural England recognises that common standards monitoring is not designed to identify the effects of nutrient enrichment associated with nitrogen deposition, but at present the air quality at the site is not resulting in measurable impacts on the grassland, including the proportion of the site (c.3%) located within 200m of the A419(T). This is despite the A419(T) already carrying significant traffic volumes.
- 5.45 While all sources of nitrogen would contribute to nutrient enrichment at the site, it appears that vehicle emissions are not currently a significant contributor to nitrogen at North Meadow and Clattinger Farm SAC. Furthermore, the effects of nitrogen deposition from traffic reduce dramatically with distance (see **Figure 5.1**), such that the 200 metre threshold is at the limit of where significant effects might occur, and the SAC is located to the west of the A419(T), which means that the prevailing wind will carry emissions from traffic away from the SAC, further reducing the importance of the 200 metre threshold. This suggests that it is reasonable to assume that adverse effects on integrity of the SAC as a result of air pollution arising from the Submission Draft (Reg 19) are unlikely.

Figure 5.1 Traffic Contribution to Pollutant Concentration at Different Distances from the Road Centre³³



- 5.46 Although it is considered unlikely that the Submission Draft (Reg 19) will lead to adverse effects on the integrity of the SAC, potential options to avoid and mitigate the effects of residual air pollution associated with the A419(T) have been considered to assist in its management in the longer term. Such options include:
- Grassland management – the site has historically been subjected to nutrient enrichment from agriculture and seasonal flooding, but retains lowland meadow habitat in favourable condition largely as a result of historic favourable management. As a result, such grasslands have some resilience to the effects of nutrient input through provision of appropriate management to ensure that the growth of competitive grasses are kept under control. Changes in the

³³ Figure C1 from Design Manual for Roads and Bridges (May 2007) Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques. Part 1 HA207/7 Air Quality

frequency and timing of hay cutting and the duration, timing and stocking rates of grazing animals may help to limit the effects of air pollution in the future.

- Control of flooding - As described above, improved control of flooding and drainage may help to control the frequency and duration of flooding in the future, and would thereby enable the effects of agricultural nutrient enrichment to be addressed. It is understood through discussions with Natural England that such measures have recently been promoted as a management option at the site.
- Provision of screening between the A419(T) and the SAC, such as the provision of tall trees and planting of dense scrub and woodland habitat may help to provide a habitat buffer which could take up a proportion of the deposited nitrogen, thereby helping to limit the extent of nitrogen deposition contributed from road traffic.

- 5.47 In light of the above, when considering the current condition of the site and the insignificant effect of air pollution despite the high volumes of existing traffic, the relatively small proportion of SAC within 200m of the A419(T), and the prevailing wind direction, **the Appropriate Assessment concluded that the Local Plan would not have adverse effects on the integrity of North Meadow and Clattinger Farm SAC in relation to air pollution, either alone or in combination with other plans and projects.**

Recreation pressure

- 5.48 At the screening stage the potential for any of the European sites in and around Cotswold District to be affected by increased recreation pressure was identified, although it was noted that the sites closest to the District boundary (**North Meadow and Clattinger Farm SAC** and **Cotswold Beechwoods SAC**) might be most likely to receive an increase in visitor numbers because of their location. North Meadow and Clattinger Farm SAC is known to already be under pressure from high visitor numbers, and the other European sites included in the assessment (Cotswold Beechwoods SAC, Rodborough Common SAC, Dixton Wood SAC, Bredon Hill SAC and Severn Estuary SAC, SPA and Ramsar site) are also publicly accessible and known to be used for tourism and recreation.
- 5.49 While the housing allocations at the towns and villages, some of which are relatively small, may not necessarily result in significant increases in visitor numbers at European sites individually, the total housing figure is (i.e. the cumulative effects of the plan as a whole) needs to be considered. The Local Plan also makes provision for tourism-related development within the District which may further increase the number of people visiting nearby European sites.
- 5.50 While there is no cut-off distance over which it is known that people would be prepared to travel to access recreation space, it is assumed that day to day visits to European sites for activities such as dog walking would be constrained to the sites closest to the District boundary (North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC) as the other European sites are all several kilometres from the District boundary and even further from the main towns and villages within the District where most development resulting from the Local Plan would take place.
- 5.51 The qualifying lowland hay meadows of North Meadow and Clattinger Farm SAC are known to be vulnerable to the potential impacts of increased recreation pressure and Natural England noted in an earlier consultation response that the current level of recreational use of this site is considered to be at or above capacity. However, site use is managed and restricted - Natural England has noted that the site is managed as a National Nature Reserve, with public access along marked routes along marked routes from March until August. This existing management will help to mitigate the potential impacts of any further increases in recreational use of the site.
- 5.52 Cotswold Beechwoods SAC is also publicly accessible and known to be used for tourism and recreation. Based on advice from Natural England, **it was recommended in an earlier draft of this HRA Report that the supporting text to policy INF7: Green Infrastructure should be expanded to incorporate further safeguards, recognising the potential for the Local Plan to have recreational impacts on Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC. The recommendation stated that this should refer to a commitment for Cotswold District Council to work with key stakeholders including**

Natural England to develop appropriate mitigation. This recommendation has now been addressed in the final version of the Submission Draft Local Plan.

- 5.53 North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are located a long way from much of the housing proposed in parts of the District other than the south, and therefore it is likely that more conveniently accessible areas of open space closer to where people live will be used for most recreational activities. Any residual increase in visitor numbers that might occur from additional housing development in Cotswold District at the European sites would be likely to be dispersed across different locations, diluting the effects of recreation activities. Therefore, it is unlikely that any one European site would see a significant increase in visitor numbers as a result of the development proposed through the Local Plan.
- 5.54 Mitigation against the potential effects of increased recreation pressure at European sites will be provided by policy INF7: Green Infrastructure which promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at sensitive European sites, and a number of the policies relating to specific towns and villages include similar provisions.
- 5.55 Taking account of the above mitigation, **the Appropriate Assessment concluded that the Local Plan would not have adverse effects on the integrity of European sites in relation to increased recreation pressure.**

In-combination effects

- 5.56 As described in **Chapter 3**, it is necessary to consider the potential for the Cotswold District Local Plan to have significant effects in-combination with other plans, as well as individually. A review was therefore undertaken of other plans that may result in significant effects in combination with the Cotswold District Local Plan, as a result of development being proposed in other areas which could affect the same European sites in and around Cotswold District. The findings of this review can be seen in full in **Appendix 3**.
- 5.57 A number of the European sites considered in this assessment lie on or outside of the District boundary, meaning that potential in-combination effects with development planned in other neighbouring districts are an important consideration. The review of HRA work carried out by neighbouring districts in relation to their emerging development plans did not identify any likely significant effects which may combine with the effects of Cotswold District Local Plan. In the case of Gloucestershire County Council's Minerals Local Plan, HRA work for the new plan is not yet available.
- 5.58 On the basis of the HRA work that has been undertaken to date, in-combination effects related to air pollution, recreation, loss of habitat or disturbance are not expected. However, where HRA work has not yet been completed by neighbouring authorities, these studies will be reviewed as they develop.
- 5.59 With respect to air pollution, the Appropriate Assessment has concluded that the Submission Draft (Reg 19) Local Plan would not have adverse effects on the integrity of North Meadow and Clattinger Farm SAC in relation to air pollution, either alone or in-combination with other plans and projects.

6 Conclusions

- 6.1 The HRA of the Submission Draft Local Plan for Cotswold District has been undertaken in accordance with currently available guidance and is based on a precautionary approach, as required under the Habitats Regulations. The findings of the screening stage were summarised in **Chapter 4** of this report and the justification for these is explained in more detail in **Appendix 4**. The findings of the Appropriate Assessment stage of the HRA are summarised in **Chapter 5** and the detailed Appropriate Assessment matrix can be found in **Appendix 5**.
- 6.2 The HRA screening conclusions for the Local Plan were that a number of the policies including the development strategies for the towns and villages may result in likely significant effects on European sites. These issues were considered further during the Appropriate Assessment. The Appropriate Assessment concluded that adverse effects on the integrity of any of the European sites were able to be ruled out in relation to physical loss of or damage to habitat and air pollution. Adverse effects on the integrity of any European sites were also able to be ruled out in relation to increased recreation pressure.
- 6.3 The potential for in-combination effects with other authorities' development plans has also been considered and no likely significant in-combination effects have been identified that will result in adverse effect on the integrity of European sites.
- 6.4 Natural England officers have reviewed the HRA work as part of the consultation on the Submission Draft Local Plan and Focussed Changes, and have confirmed that they concur with the conclusions of the assessment.

LUC
April 2017

Appendix 1

Consultation responses received in relation to earlier
HRA work on the Local Plan

Table A1.1: Consultation responses received in relation to the January 2015 HRA Report for the Regulation 18 Consultation version of the Development Strategy and Site Allocations for the Local Plan

Note that this table has been updated since it was first presented in Appendix 1 of the October 2015 HRA Report for the Regulation 18 consultation on the Local Plan Planning Policies. At that time, not all of the consultation comments received in relation to the Development Strategy and Site Allocations could be addressed as some were not relevant to the HRA work that was being undertaken for the Regulation 18 consultation on the Planning Policies. Therefore, it was stated that some of the comments would be addressed at the next stages of the HRA. Those comments have now been addressed during the preparation of this HRA Report and the 'response' column has been updated accordingly with additional text in *italics* below the original response.

| Consultee | Comment | Response |
|-----------------|---|--|
| Natural England | Natural England has considered the Local Plan Regulation 18 consultation alongside the Sustainability Appraisal and the Habitats Regulation Assessment reports. Overall we welcome the recognition given to the high value of the district's natural environment and consider the proposed visions and strategic objectives to be generally positive. We particularly welcome the intention to conserve and enhance the high quality and diversity of the Natural Environment and to support the creation of new green infrastructure to enhance environmental quality and provide health benefits. | Noted, no action required. |
| Natural England | Natural England strongly agrees with the HRA report's recommendation that [former] policy SP4 'should be expanded to make specific reference to the protection of the integrity of SACs, SPAs and Ramsar sites.' | Noted. The policy referred to does not feature in the current consultation on the Planning Policies. Any amendments to [former] policy SP4 will therefore be addressed during the next iteration of the HRA for the Pre-Submission Local Plan which will feature both the Development Strategy and Site Allocations and the Planning Policies. It is also noted that [former] policy EN4: Biodiversity and Geodiversity: Designated Sites in the current Planning Policies consultation document relates specifically to the protection of European sites which may negate the need for the recommendation made previously in relation to policy SP4. <i>Updated response: The amendment to former Policy SP4 (now H7: Gypsy, Traveller and Travelling Showpeople Accommodation) previously recommended in the HRA work and</i> |

| Consultee | Comment | Response |
|-----------------|---|--|
| | | <p><i>noted by Natural England has not been addressed in the Submission Draft Local Plan; however as previously noted, former policy EN4: Biodiversity and Geodiversity: Designated Sites (updated to EN6 in Regulation 19 version, then EN8 in the Focussed Changes) in the Local Plan relates specifically to the protection of European sites which reduces the need for the recommendation made previously in relation to former policy SP4.</i></p> |
| Natural England | <p>Natural England note that detailed traffic modelling and a water cycle study will be used to inform later iterations of the Habitat Regulations Assessment (HRA) and welcome the precautionary approach currently being taken in assessing the potential impacts of the emerging Local Plan on European Protected Sites.</p> | <p>Noted. While traffic data are not available to inform the HRA at this stage, the updated Water Cycle Study has now been published and the findings have been taken into account to inform the HRA of the Planning Policies.</p> |
| Natural England | <p>Recreational pressure is considered to be a potential risk for North Meadow and Clattinger Farm Special Area of Conservation (SAC), Cotswold Beechwoods SAC and Rodborough Common SAC. We note that the HRA report concludes that it is unlikely that any one European Site would see a significant increase in visitor numbers as a result of development proposed in the plan. Natural England considers that given the sensitivity of the sites involved this conclusion could be made more robust by referencing the actual numbers of dwellings allocated within set distances from the European Sites.</p> | <p>Noted. The overall quantum and distribution of development in Cotswold District does not feature in the current consultation on the Planning Policies. Therefore, this comment will be addressed during the next iteration of the HRA for the Proposed-Submission Local Plan which will feature both the Development Strategy and Site Allocations and the Planning Policies.</p> <p><i>This issue has been revisited during the preparation of this HRA Report. Natural England's comment has been superseded by its more recent consultation response received in relation to the Planning Policies with regards to recreation pressure at the European sites, as detailed in Table A1.2 below.</i></p> |
| Natural England | <p>In preparing their own HRA document Stroud District Council established a zone of influence within which they consider development likely to have a negative impact on the integrity of Rodborough Common. This may assist you in assessing the potential</p> | <p>Noted. The HRA work for Stroud's Local Plan identified a 'core recreational catchment' of 4km which will be taken into account in the</p> |

| Consultee | Comment | Response |
|-----------------|---|--|
| | for impacts on that site alone. | <p>HRA work for Cotswold's Local Plan as relevant.</p> <p><i>This has been taken into account in the preparation of this HRA report, as detailed in Appendix 5.</i></p> |
| Natural England | Further to this, we acknowledge the possible mitigation of impacts presented by policy SP9 and support the recommendation in section 5.54 that housing allocations should be accompanied by the provision of suitable Green Infrastructure in order to reduce potential impacts. | Noted, no action required. |
| Natural England | <p>At this stage Natural England are inclined to disagree with the conclusion that there will be no 'in-combination' effects. The HRA report relies on conclusions drawn in other HRAs of Local Plans that all possible impacts will be mitigated. Since the conclusions drawn in these plans have not yet been tested by public inquiry it is not sufficient to rely on the conclusions drawn. Further, since elements of this HRA report and others are incomplete, drawing a conclusion on impacts appears premature.</p> <p>For example, the Cotswold District Plan HRA and the Gloucester, Cheltenham and Tewkesbury HRA both consider that further information is required regarding air pollution impacts on Cotswold Beechwoods SAC as a result of increased traffic on the A46. It is important to establish the scale of impact before ruling out an in-combination effect.</p> | <p>This comment was received from Natural England in relation to the January 2015 HRA Report, since which time the HRA work for neighbouring authorities' Local Plans has progressed and a number of those plans have since been adopted, as described in Appendix 3. The assessment of in-combination effects detailed in this updated HRA report reflects the additional information now available.</p> |

Table A1.2: Consultation responses received in relation to the October 2015 HRA Report for the Regulation 18 Consultation version of the Planning Policies

| Consultee | Comment | Response |
|-----------------|--|--|
| Natural England | <p>Air pollution</p> <p>We note that likely significant effects could not be screened out in relation to Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC due to these sites being within 200m of an A-road. This will therefore be considered in the next iteration of the Local Plan and its HRA.</p> | <p>Noted. This issue has been revisited during the preparation of this updated HRA Report, as described in Sections 4 and 5.</p> |
| Natural England | <p>Impacts of recreation</p> <p>Natural England does not agree with the HRA's conclusion that [former] policy EN4: Designated Sites provides adequate mitigation to allow a conclusion of no likely significant effects in relation to recreation impacts on European sites from the Planning Policies. We are concerned that relying on this policy wording alone is in effect passing further HRA assessment down to lower tier (i.e. at planning application stage). By their nature, recreational impacts can result from the in combination and cumulative interrelationships of plans and projects across a wide area. They are therefore best understood and resolved strategically, at the plan making stage.</p> | <p>Noted. This issue has been revisited during the preparation of this updated HRA Report, as described in Sections 4 and 5.</p> |
| Natural England | <p>Further advice on relying on lower tier assessments 'down the line'</p> <p>The protective regime of the Directive is intended to operate at differing levels. In some circumstances assessment 'down the line' will be more effective in assessing the potential effects of a proposal on a particular site and protecting its integrity. However, three tests should be applied to determine when this is appropriate. It will be appropriate to consider relying on the HRA of lower tier plans (e.g. planning applications), in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:</p> <p>A] The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas</p> <p>B] The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of</p> | <p>This information is noted.</p> |

| Consultee | Comment | Response |
|-----------------|--|---|
| | <p>any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and</p> <p>C] The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy.</p> <p>(Section 4 “Dealing with Uncertainty”, DTA, 2009)</p> | |
| Natural England | <p>Recreational pressure on North Meadow and Clattinger Farm SAC</p> <p>North Meadow and Clattinger Farm SAC is managed as a National Nature Reserve, with public access along marked routes from March until August. The current level of recreational use of this site is considered to be at or above capacity, however, site use is managed and restricted on site. With this management in place, it may be possible to screen out recreational impacts on North Meadow and Clattinger Farm SAC.</p> | Noted. This point has been reflected in the updated Appropriate Assessment presented in this HRA Report, as described in Section 5. |
| Natural England | <p>Recreational pressure on Cotswold Beechwoods SAC</p> <p>Natural England is at the start of a process to better understand the nature and scale of potential recreational impacts on the Cotswold Beechwoods SAC, and what action, if any, is required. Due to the nature of this issue, we will be working closely with the relevant Local Authorities including Cotswold District.</p> <p>It may be possible for the plan to incorporate further safeguards through its requirements for on-site green infrastructure in policy INF8: Green Infrastructure. This approach was used in the Gloucester, Cheltenham, Tewkesbury Joint Core Strategy (JCS). The JCS recognised potential recreational impacts on Cotswold Beechwoods SAC, and included the following paragraph in support to its policy on Green Infrastructure:</p> <p><i>5.4.7 ... It is recognised that the growth to be delivered through the JCS may increase demands on green spaces through increased recreational use. This will require careful management, particularly for ecologically sensitive sites. This could include requiring developer contributions for such provision (for example, a contribution towards the management of the Cotswolds Beechwoods Special Area of Conservation [SAC]). The JCS authorities will work together with key stakeholders, such as Natural England and the Environmental Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this. Policy on developer contributions is set out in Policy INF7. ... We recommend further discussions prior to the next iteration of the Local Plan and HRA.</i></p> | Noted. This recommendation has been reflected in the updated Appropriate Assessment presented in this HRA Report, as described in Appendix 5. |

Table A1.3: Consultation responses received in relation to the June 2016 HRA Report for the Regulation 19 Consultation Local Plan

| Consultee | Comment | Response |
|------------------------|---|---|
| <p>Natural England</p> | <p>From: Jones, Steph (NE) Sent: 06 July 2016 18:26 To: Chris Vickery; Jeremy Owen; James Brain; Kate Nicholls Subject: Cotswold HRA - Next Steps from meeting</p> <p>Hello All,</p> <p>As promised at our meeting this morning I have managed to speak to our specialist from the national team Rachel Hoskin about the situation with North Meadow and Clattinger Farm SAC and the CDC Local Plan.</p> <p>Whilst our advice in essence remains unchanged, I provide below some further clarity on what an evidence base should provide and how to consider the robustness of any alternative explanations of a position of confidence in no likely significant effect or no impact on the integrity of the site where in fact no likely significant effect cannot be ruled out.</p> <p>Confidence is the key word. To screen out as no likely significant effect there must be a sound justification. The evidence base must provide the competent authority with confidence, backed up with evidence, that there will be no likely significant effect as a result of the plan/project in question. If this evidence base includes expert opinion, this opinion is always based on something so there is always an evidence base in some form to rely on.</p> <p>At the meeting this morning we discussed some 'alternative' sources of information that could go towards forming this position of confidence. It is important to be clear up front that until you know what the information to be collated is going to tell you, you do not know if this qualifies as providing confidence and so it is a case of collating the evidence from these 'alternative' sources and establishing where this puts you.</p> <p>The options mentioned this morning and some further thoughts on these are:</p> <ul style="list-style-type: none"> Local knowledge of the site – Whilst you correctly state that a very small proportion of the site falls within 200m of the road a better understanding of the interest feature/s within this part of the site would be important if this was something you wanted to consider in the evidence base. I have emailed my colleague Rob Howell, the Responsible Officer for the site to ask him for | <p>Additional information on current and likely future traffic flows has been examined from Department of Transport sources, travel to work data, and using the TEMPro modelling tool.</p> <p>The contribution of agriculture to nutrient enrichment at the site has been explored using APIS and Natural England data.</p> <p>LUC ecologist David Green has discussed the sensitivity of the site with Natural England's responsible officer Rob Howell.</p> <p>The HRA report has been updated, based on this information (paragraphs 5.25-5.47).</p> |

| Consultee | Comment | Response |
|-----------|--|----------|
| | <p>any detail on this and given him your details.</p> <ul style="list-style-type: none"> • Data on traffic direction and use from HE – This could be helpful in showing overall use and from where, as you correctly state this is a major trunk road. You would need to include what CDC's predicted portion of the overall usage figure is – so essentially you would be looking at the current baseline and how your plan impacts on that alone in the first instance • Swindon and Agricultural Use – It would be advantageous to get a better understanding of the evidence base used by Swindon to establish their contribution to the baseline, it has been mentioned this is minimal from traffic, there must be evidence to show this. <p>Based on our conversations today Natural England's advice is that these forms of evidence would acceptable if they provide a position of confidence.</p> <p>My actions moving forward - Assuming you decide to look at these options I have emailed Rob on site specific information and I hope he can be in contact with you as soon as he has the availability to do so.</p> <p>I will forward this response to my colleague Eric Steer and Rachel Hoskin so they are appraised of the situation. I am back in the office on Monday the 18th and I am happy for a telecall if you would like to discuss how this has moved forward and where you are at that point if this would be helpful? Eric will have all your contacts if there is anything he would like to add as our Air Quality Specialist on his return to the office next week.</p> <p>I hope this helps you to move forward towards a better informed position as quickly as is possible.</p> <p>Steph Jones Lead Adviser - Sustainable Development South Mercia Team Natural England</p> | |

Table A1.4: Consultation responses received in relation to the January 2017 HRA Report for the Submission Draft Local Plan and Focussed Changes

| Consultee | Comment | Response |
|--------------------------------|---|--|
| Natural England | <p>In a letter dated 1 March 2017, Natural England has stated:</p> <p>“Habitat Regulations Assessment (HRA) The Conservation of Habitats and Species Regulations 2010 (as amended)</p> <p>Natural England has reviewed the draft HRA report (both screening and Appropriate Assessment stages) provided for the publication draft of the Cotswold Local Plan. The assessment provided concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of information provided, Natural England concurs with this view.”</p> | <p>The conclusions (paragraph 6.4) have been updated to reflect this.</p> |
| Gloucestershire County Council | <p>In an email dated 22 February 2017, Gloucestershire County Council has stated:</p> <p>“HRA January 2017 – Appendix 3 should ideally also have listed the adopted versions of the Gloucestershire Waste Core Strategy, Gloucestershire Local Minerals Plan and Gloucestershire Local Transport Plan. Although we are very confident that there are no in-combination effects with these county plans to consider it would be good to include them in Appendix 3 of the HRA just for completeness.”</p> | <p>These plans have been added to Appendix 3 and the text in the in-combination effects section has been updated in line with these changes (paragraphs 5.57-5.58).</p> <p>As the HRA document has been reissued to reflect these changes, Appendix 3 has also been reviewed and updated to take account of any changes to the status of other plans since January 2017.</p> |

Appendix 2

Attributes of European Sites within Cotswold District (+ 15km)

| European site | Area (ha) | Location | Qualifying features | Key vulnerabilities and environmental conditions to support site integrity |
|-----------------------|-----------|--|---|---|
| Severn Estuary SPA | 24,663 | A long thin site located approximately 10km to the west of the Cotswold District boundary. | Bewick's swan Gadwall Greater white-fronted goose Dunlin Shelduck Redshank Waterfowl | <ul style="list-style-type: none"> • Threats identified in the Site Improvement Plan include air pollution and water pollution. • Natural erosion. • Site is dependent on the tidal regime and is vulnerable to large scale interference, including human actions. These include, land claim, aggregate extraction/dredging, physical developments such as barrage construction flood defences, pollution (industrial, oil spillage), eutrophication and tourism based activities and disturbance. |
| Severn Estuary Ramsar | 24,663 | A long thin site located approximately 10km to the west of the Cotswold District boundary. | <p>Criterion 1: Due to immense tidal range and the following habitats: Sandbanks which are slightly covered by sea water all the time. Estuaries. Mudflats and sandflats not covered by seawater at low tide. Atlantic Sea Meadow (<i>Glauco-Puccinellietalia maritimae</i>).</p> <p>Criterion 3: Unusual estuarine communities, reduced diversity and high productivity.</p> <p>Criterion 4: This site is important for the run of migratory fish between sea and river via estuary. Species include Atlantic Salmon <i>Salmo salar</i>, sea trout <i>S. trutta</i>, sea lamprey <i>Petromyzon marinus</i>, river lamprey <i>Lampetra fluviatilis</i>, allis shad <i>Alosa alosa</i>, twaite shad <i>A. fallax</i> and eel <i>Anguilla Anguilla</i>. It is also of particular importance for migratory birds during spring and autumn.</p> <p>Criterion 5: Internationally important assemblage of waterfowl (70,919)</p> <p>Criterion 6: Internationally important wintering populations of the following bird species: Bewick's swan <i>Cygnus columbianus bewickii</i> Greater white-fronted goose <i>Anser albifrons</i></p> | <ul style="list-style-type: none"> • Dredging. • Erosion. • Recreation/tourism disturbance (unspecified). |

| European site | Area (ha) | Location | Qualifying features | Key vulnerabilities and environmental conditions to support site integrity |
|-------------------------|-----------|---|--|--|
| | | | <p><i>albifrons</i> Common shelduck <i>Tadorna tadorna</i> Dunlin <i>Calidris alpine aplina</i> Common redshank <i>Tringa tetanus tetanus</i> Criterion 8: More than 110 species of fish recorded, one of the most diverse systems in the UK. Significant migration route and spawning/nursery ground.</p> | |
| Severn Estuary SAC | 73,715 | A long thin site located approximately 10km to the west of the Cotswold District boundary. | <p>Estuaries. Mudflats and sandflats not covered by seawater at low tide. Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>). Sandbanks which are slightly covered by sea water all the time. Reefs. Sea lamprey River lamprey Twaite Shad</p> | <ul style="list-style-type: none"> • Threats identified in the Site Improvement Plan include water pollution and air pollution. • Natural erosion. • Estuary is vulnerable to large-scale interference, particularly from human actions. These include land-claim, aggregate extraction, physical developments such as barrage construction, flood defences, industrial pollution, oil spillage and tourism based activities and disturbance. |
| Bredon Hill SAC | 360 | Fragmented site lying approximately 10km to the west of the Cotswold District boundary. | Violet click-beetle <i>Limoniscus violaceus</i> | <ul style="list-style-type: none"> • Threats identified in the Site Improvement Plan include air pollution. • Lack of a replacement generation of trees for the current ancient trees which are suitable for the Violet click-beetle. |
| Dixton Wood SAC | 13 | Very small site located approximately 7km to the west of the Cotswold District boundary. | Violet click-beetle <i>Limoniscus violaceus</i> | <ul style="list-style-type: none"> • Lack of future replacement pollards (age-class skewed to older generation) and game management practices. • Management Agreement will address these issues as well preventing loss through senescence and wind-blow. |
| Cotswold Beechwoods SAC | 586 | Fragmented site lying slightly within and immediately adjacent to the western boundary of the Cotswold District boundary. | <p>Asperulo-Fagetum beech forests Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia)</p> | <ul style="list-style-type: none"> • Threats identified in the Site Improvement Plan include air pollution and public access and disturbance. • Maintenance measures in silvicultural practices including selective forestry, group fellings and small areas of coppicing. • Age-class and structural diversity is being enhanced and early removal of planted |

| European site | Area (ha) | Location | Qualifying features | Key vulnerabilities and environmental conditions to support site integrity |
|--------------------------------------|-----------|---|--|---|
| Rodborough Common SAC | 104 | Fragmented site lying approximately 2.5km to the west of the Cotswold District boundary. | Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) | <p>conifers is being encouraged.</p> <ul style="list-style-type: none"> • Threats identified in the Site Improvement Plan include air pollution. • Dependent on the maintenance of grazing. • National Trust developed a project to restore management to the site. • Traffic calming measures are being implemented on busy through roads to reduce livestock injuries. • Scrub management is being addressed through the Environmental Sensitive Areas scheme. • Recreation has an impact on areas accessible by cars, and is causing local erosion. |
| North Meadow and Clattinger Farm SAC | 105 | Fragmented site located immediately adjacent to the southern boundary of Cotswold District. | Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinails</i>) | <ul style="list-style-type: none"> • Threats identified in the Site Improvement Plan include inappropriate water levels, habitat fragmentation, public access/disturbance and water pollution. • Dependent on traditional agricultural practices of hay cutting with aftermath cattle grazing for seasonal cattle grazing. • However, traditional hay meadow management is uneconomic in the present agricultural climate and support through agri-environmental payments or a management agreement may be required to secure the longevity of the habitat. • Adjacent extraction and renovation of gravel workings are a potential threat to water levels and are subject to monitoring/mitigation measures. |

Appendix 3

Plans, Policies and Programmes with the Potential for In-Combination Effects with the Cotswold District Local Plan

Local Plans and Strategies

Gloucestershire Waste Core Strategy (adopted November 2012)

Gloucestershire is located to the west of Cotswold District.

Waste management provision:

Additional waste management facilities will be permitted primarily within Zone C; the strip of land between the flood zone to the west and the AONB to the east running from Tewkesbury in the north to Berkeley in the south. This includes five strategic sites for waste facilities:

Three located between Hardwicke and Bishops Cleave north of Cheltenham:

1. Wingmoor Farm east (2.8 ha)
2. The Park (6.8 ha)
3. Wingmoor Farm West (4.0 ha)

Two located north of Whitminster around Moreton Valence:

4. Javelin Park (5 hectares)
5. Land at Moreton Valence (7 ha)

Additionally, existing and allocated sites for waste management use will normally be safeguarded

HRA Findings:

The HRA Screening Report of the Waste Core Strategy (October 2009) concluded that all of the site allocations within the Waste Core Strategy have the potential for likely significant effects upon European sites. However, with mitigation, it was determined that Appropriate Assessment would not be required; **therefore in-combination effects from the Gloucestershire Waste Core Strategy and the Cotswold District Local Plan are not expected.**

Gloucestershire Minerals Local Plan (adopted April 2003) and the emerging Minerals Local Plan for Gloucestershire 2018-2032 (September 2016 draft)

Although many of the policies within the Gloucester Minerals Local Plan (2003) are still in force, the development quantum listed within this plan cover the plan period of 1997-2006 and are therefore expired. The below therefore relates to the emerging Minerals Local Plan for Gloucestershire 2018-2032 (September 2016 draft).

Minerals extraction provision:

Site allocations for future aggregate working:

1. Preferred Area at Stowe Hill / Clearwell;
2. Preferred Area at Drybrook;
3. Preferred Area at Stowfield;
4. Preferred Area at Daglingworth;
5. Preferred Areas at Huntsman's;
6. Specific Site at Manor Farm, Kempsford;
7. Preferred Area at Redpool's Farm, Twyning;
8. Area of Search at Lady Lamb Farm, Fairford;
9. Areas of Search at Land between Kempsford & Whelford;
10. Areas of Search at Down Ampney and Charlham Farm;

HRA Findings:

The HRA Main Report (June 2014) for the Gloucestershire Minerals Local Plan: Site Options & Draft Policy

Framework Stage concluded that the Minerals Local Plan would not be likely to have a significant effect on any European Site, either alone or in combination with other plans or projects. However, the final draft of the Minerals Local Plan has not yet been produced or undergone an HRA. **Therefore, the Gloucestershire Minerals Local Plan is not sufficiently advanced to reach a conclusion regarding the potential for in-combination effects with the Cotswold District Local Plan.**

Gloucestershire's Local Transport Plan 2015-2031 (revised June 2016)

Transport provision:

The main transport priorities for the county to support economic growth are:

- A417 Missing Link
- A46 M5 Junction 9 corridor improvements
- M5 Junction 10 all ways improvement
- Gloucestershire rail strategy, including Gloucester and Cheltenham stations regeneration

Countywide short-term capital delivery priorities (2015 to 2021), long-term capital delivery priorities (2021 to 2031) and revenue projects delivery priorities (2015 to 2031) also provided for the following:

- Highways
- Rail
- Bus
- Cycle
- 'Thinktravel'.

HRA Findings:

The HRA for the Local Transport Plan 2015-2031 (April 2015) concluded that, providing recommendations are included within the final Local Transport Plan, that the plan can be screened out as not leading to likely significant effects either alone or in combination with other relevant projects and plans. **Therefore, no in-combination likely significant effects are expected with the Cotswold District Local Plan.**

West Oxfordshire Local Plan 2031 (submitted for examination July 2015 with main modifications submitted in March 2017)

West Oxfordshire District lies to the east of Cotswold District.

Housing:

Policy H1 – Amount and Distribution of Housing states that from 2011-2031, provision will be made for at least 13,200 dwellings across the Plan Area to meet West Oxfordshire's identified housing needs and a further 2,750 homes in the period of 2021-2031 to meet Oxford City's identified housing needs. This includes 2,750 new homes in the Witney sub-area, 2,600 in the Carterton sub-area, 2,400 new homes in the Chipping Norton sub-area, 2,800 new homes in the Eynsham – Woodstock sub-area and 1,000 new homes in the Burford – Charlbury sub-area.

Employment Land Provision:

Witney will be the main focus for additional employment land provision within the District and 20ha of new employment land is to be provided to the west of the town. In Carterton, 5ha of new employment land is to be provided at West Oxon Business Park and Land at Ventura Park. Employment land is to be provided to the eastern side of Chipping Norton of 9 hectares (and up to 7.3 hectares). Around 40 ha of employment land in the form of a campus-style 'science park' to be taken forward through an Area Action Plan (AAP) at West Oxfordshire Garden Village. A further 5ha is to be provided at other towns, villages and rural locations within existing commitments from the previous plan's allocations.

HRA Findings

The conclusion of the West Oxfordshire Pre-Submission Local Plan Habitats Regulation Assessment (March

2015) was that there was no prospect of a likely significant effect from the West Oxfordshire Local Plan on any European sites with the potential exception of the Oxford Meadows SAC in relation to air quality. Due to its close proximity to the A34 and A40 the population growth resulting from the plan may lead to increased levels of nitrogen deposition and NOx concentration within part of the Oxford Meadows SAC. The Council is currently undertaking more advanced studies to determine potential impacts on air quality with the aim of identifying appropriate mitigation measures. Pending this investigation, plan-level mitigation measures have been proposed to address the assumed air quality effects of the plan and a conclusion of no adverse effect on this SAC has been reached in light of that mitigation. In any case, Oxford Meadows SAC is located more than 15km from Cotswold District, and so **in-combination effects from the West Oxfordshire Local Plan and the Cotswold District Local Plan are not expected.**

The inspector recommended in his Preliminary Findings that additional text should be added in relation to strategic assessment and monitoring of air quality at Oxford Meadows Special Area of Conservation (SAC). □

Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies (adopted December 2016)

Vale of White Horse District lies to the south-east of Cotswold District.

Housing:

Core Policy 4: Meeting Our Housing Needs sets out the proposed housing target for at least 20,560 homes to be delivered in the plan period between 2011 and 2031. The largest of the strategic allocations within the District will be made as follows:

- Valley Park, Harwell – 2,550 homes.
- Grove Airfield – 2,500 homes.
- Crab Hill, Wantage – 1,500 homes.
- North of Abingdon-on-Thames – 800 homes.
- East of Harwell Campus – 850 homes.

Employment Land Provision:

In accordance with the District's assessed needs as set out in the Employment Land Review, provision is to be made through Core Policy 6: Meeting Business and Employment Needs for around 219 hectares of strategic employment land which is expected to deliver approximately 23,000 jobs between 2011 and 2031. This land will be provided at the following strategic sites and saved allocations from the Vale Local Plan 2011:

- Milton Park – 28ha
- Harwell Campus – 93ha (Enterprise Zone); 35 (without EZ)
- Monks Farm-North Grove – 6ha
- Didcot A – 29ha
- Western Vale, South of Park Road, Faringdon – 3ha
- Other saved Local Plan 2011 allocations – 24.2ha

HRA Findings

The HRA report for the Local Plan (September 2014) concluded that housing development across Oxfordshire will result in an increase in nitrogen deposition and NOx concentration within a small part of the Oxford Meadows SAC as it lies adjacent to the A34 and A40. As such the Oxfordshire authorities are undertaking more detailed studies to investigate air quality within the SAC adjacent to the A34 and A40, which will in turn inform specific mitigation interventions. As a precaution, until that study is completed, it has been assumed in the HRA for the Local Plan that an air quality effect may exist and appropriate plan-level measures to address the issue have been incorporated in the Local Plan Part 1 which would enable a conclusion of no adverse effect to be reached. In any case, Oxford Meadows SAC is located more than 15km from Cotswold District, and so **in-combination likely significant effects from the Vale of White Horse Local Plan and the Cotswold District Local Plan are not expected.**

Swindon Borough Local Plan 2026 (adopted March 2015)

Swindon Borough lies to the south of Cotswold District.

Housing:

Policy SD2: The Sustainable Development Strategy states that between 2011 and 2026 at least 22,000 new dwellings will be delivered in the Borough, with 1,150 average per annum between 2011 and 2016 and 1,625 average per annum between 2016 and 2026. The new homes will be distributed as follows:

- Swindon's Central Area – 1,000 homes
- Remainder Swindon's existing urban area – 3,500 homes
- Northern Development Area – 589 homes
- Wichelstowe – 4,064 homes
- Commonhead – 890 homes
- Tadpole Farm – 1,695 homes
- New Eastern Villages – 6,000 homes
- Rowborough – 1,500 homes
- South Marston Village – 640 homes
- Kingsdown (east of the A419) – 1,650 homes
- Highworth – 200 homes
- Wroughton – 150 homes
- Other Villages (in total) – 100 homes

Employment Land Provision:

Policy SD2: The Sustainable Development Strategy states that 119.5ha of employment land will be provided in the Borough through 77.5ha of additional employment land and 42ha with extant permission and existing allocations carried forward. The employment land provision will be distributed as follows:

- Swindon's Central Area – 90,000m² office space
- Wichelstowe – 12.5ha
- Commonhead – 15ha
- Tadpole Farm – 5ha
- New Eastern Villages – 40ha
- Highworth – 5ha

HRA Findings:

The June 2013 HRA update note states that there will be no adverse effects on European sites as a result of the implementation of the Swindon Local Plan. It refers to the full HRA report that was produced in 2009 and states that the changes made to the final version of the Plan do not significantly affect the findings of that HRA report, namely that the Local Plan will not have adverse effects on the integrity of European sites provided that the Pre-Submission document incorporates the avoidance and mitigation measures recommended within the HRA Report (July 2009). These were incorporated in the final version of the Local Plan and Table 3 in the HRA update note outlines these recommendations and illustrates how they have been incorporated into the Local Plan. **As such, in-combination likely significant effects with the Cotswold District Local Plan are not considered likely.**

Wiltshire Core Strategy (adopted January 2015)

Wiltshire is located to the south of Cotswold District.

Work has been undertaken by the Council on a partial review of the Core Strategy to allow for any gaps in policy to be addressed in order to improve conformity with national planning policy. Consultation on the

scope of the review took place up to May 2015 and the Council is to prepare evidence on each policy area. Reasonable alternative options will be considered for each policy area which will be subject to Sustainability Appraisal, incorporating requirements for Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) as appropriate

Housing:

Core Policy 2: Delivery Strategy states 42,000 new dwellings will be provided between 2006-2026. This shall be divided by housing market areas as follows:

- East Wiltshire – 5,900 homes
- North and West Wiltshire – 24,740 homes
- South Wiltshire – 10,420 homes
- West of Swindon 200 homes

Employment Land Provision:

Core Policy 2: Delivery Strategy provides for the delivery of 178ha of new strategic employment land which will be located at Principal Employment Areas within each of the 18 Community Areas.

HRA Findings:

The updated April 2014 HRA Report for the Wiltshire Core Strategy concluded that the Core Strategy will not have significant effects on any of the European sites assessed. The HRA did highlight the potential for habitat loss at Bath and Bradford Bats SAC as a result of additional housing at Trowbridge, Bradford, Corsham or Westbury Community Areas (to be allocated either the Site Allocations DPD or a neighbourhood plan) although this would be assessed through the HRA of the Plan(s) that would deliver the housing. **As the SAC is more than 15km from Cotswold District, in-combination likely significant effects between the Wiltshire Core Strategy and the Cotswold District Local Plan are not considered likely.**

South Gloucestershire Core Strategy 2006-2027 (adopted December 2013)

South Gloucestershire District lies to the south-west of Cotswold District.

Housing:

Policy CS15: Distribution of Housing states that 28,550 new dwellings will be built between 2006-2027 to be distributed as follows:

North and East Fringes of Bristol urban area:

- Existing Local Plan Sites – 7,060
- Potential housing sites, including infill development – 7,060
- New Neighbourhood east of Harry Stoke – 2,000
- New Neighbourhood Cribbs/Patchway – 5,700

Rest of South Gloucestershire:

- Potential housing sites, including infill development – 965
- New neighbourhood at Yate – 2,700
- Housing opportunity at Thornbury – 800

Small site windfall allowance - 2,100

The Policies, Sites and Places DPD will allocate detailed non-strategic sites for housing development.

Employment Land Provision:

Policy CS11: Distribution of Economic Development Land states that the following land is safeguarded for employment development:

- North Fringe of Bristol urban area – 355ha
- East Fringe of Bristol urban area – 147ha

- Yate and Chipping Sodbury – 88ha
- New neighbourhood at North Yate – up to 9ha
- Thornbury – 19ha
- Rural area – 14ha
- Severnside (existing area with planning permission) – 635ha

Specific sites are also safeguarded which can be found in Policy CS12: Safeguarded Areas for Economic Development and CS13: Non-Safeguarded Economic Development Sites.

The Policies, Sites and Places DPD will allocate detailed non-strategic sites for employment development.

HRA Findings:

The March 2011 South Gloucestershire Core Strategy HRA identified a number of policies that had the potential for significantly adverse effects on the **Severn Estuary SPA and SAC** and Chew Valley Lake SPA and Avon Gorge Woodland SAC. Subject to the text of the policies/or supporting text of the policies being amended in Policies CS3, CS5, CS11, CS12, CS19 and CS34 the Core Strategy it was concluded that the Core Strategy would not have a significantly adverse effect on any European sites. Furthermore, Chew Valley Lake SPA and Avon Gorge Woodland SAC are located on the other side of South Gloucestershire from Cotswold District. **Therefore, no in-combination likely significant effects are expected between the South Gloucester Core Strategy and the Cotswold District Local Plan.**

Stroud District Local Plan (adopted November 2015)

Stroud District is located to the west of Cotswold District.

Housing:

Core Policy CP2: Strategic Growth and Development Locations sets out the overall levels of growth that will be planned for up to 2031, as well as the strategic sites where most of the development will be met. Stroud District will accommodate at least 11,400 additional dwellings for the period 2006-2031. The strategic sites identified are as follows:

- Hunts Grove Extension – 750
- North East Cam – 450
- Sharpness – 300
- Stroud Valleys – 450
- West of Stonehouse – 1,350

Employment Land Provision:

Core Policy CP2: Strategic Growth and Development Locations also sets out the needs of the District in terms of the development of employment and states that at 58 hectares of additional employment land will be accommodated in Stroud District over the period 2006-2031.

- The following locations have been identified as strategic sites to accommodate this development:
- Quedgeley East – 13ha
- North East Cam – 12ha
- Sharpness – 17ha
- Stroud Valleys – Intensification
- Stonehouse – 10ha

HRA Findings:

The HRA report which was submitted alongside the Stroud Local Plan concluded that three European Sites could not be screened/scoped out without more detailed consideration and were therefore taken forward for Appropriate Assessment. These sites were **Severn Estuary SAC, SPA & Ramsar site; Rodborough**

Common SAC; and **Cotswold Beechwoods SAC**. It was concluded in the HRA that if the residual recommendations included within the assessment were incorporated into the Plan, Stroud District would have an appropriate policy mechanism in place to ensure that adverse effects on the integrity of the Severn Estuary SAC/SPA/Ramsar site, Rodborough Common SAC and Cotswold Beechwoods SAC could be avoided. The HRA was updated in July 2015 to address the modifications made to the Plan following the inspector's recommendations and the updated HRA report concluded that there would be no likely significant effects (either alone or in combination) resulting from these modifications. **Therefore, no in-combination likely significant effects are expected with the Cotswold District Local Plan.**

Gloucester, Cheltenham, Tewkesbury Joint Core Strategy Submission Version (November 2014)

Note that the JCS is now at the main modification stage and the Proposed Main Modifications were published for consultation between 27th February and 10th April 2017.

Gloucester, Cheltenham and Tewkesbury are located to the west of Cotswold District. Only Cheltenham and Tewkesbury share a boundary with Cotswold District.

Housing:

Policy SA1: Strategic Allocations Policy sets out the level of growth to be delivered up to 2031 and identifies areas for this growth. The total indicative level of housing to be delivered has been identified in the Inspectors Interim Report as being 13,993. Strategic sites that have been identified are as follows:

- Innsworth – 1,300
- Twigworth – 1,363
- South Churchdown – 1,100
- North Brockworth – 1,500
- North West Cheltenham – 4,285
- MOD Site at Ashchurch – 2,725
- Winneycroft – 620
- West Cheltenham – 1,100

Employment Land Provision

Policy SA1: Strategic Allocations Policy has also identified the delivery of employment land totalling 129.2ha as follows:

- Innsworth – 9.1ha
- South Churchdown – 17.4ha
- North West Cheltenham – 23.4ha
- MOD Site at Ashchurch – 20ha
- Ashchurch – 14.3ha
- West Cheltenham – 45ha

HRA Findings:

The HRA Report (May 2014) for the Pre-Submission Draft Joint Core Strategy document states that screening found that for the majority of the European sites, there were unlikely to be any significant effects alone as a result of the Pre-Submission Draft Joint Core Strategy. However, uncertainty was identified with regard to short range and diffuse atmospheric pollution impacts as well as recreational impacts both alone and in-combination on the Cotswold Beechwoods SAC. Furthermore, the screening exercise also identified uncertainty with regard to the potential for significant in-combination effects on six European sites as a result of changes to water levels and/ or as a result of changes to water quality. The subsequent Appropriate Assessment concluded that the mitigation provided through Pre-Submission Draft Joint Core Strategy policies and available at the project level would address the potential for adverse effects both alone and in-combination on the Cotswold Beechwoods SAC as a result of increased atmospheric pollution as well as an increased level of recreational activity. In relation to water levels and water quality, the HRA recommended that a water cycle study is carried out to fully assess the impacts of the plan on the water environment as a whole in combination with other plans and programmes. In conclusion the HRA stated that, given the

mitigation provided by Draft Joint Core Strategy Policies, current regulatory processes (EA Review of Consents) and taking into account recommendations of the HRA itself which relate to the performance of a water cycle study, the Pre-Submission Draft Joint Core Strategy was not expected to have adverse in-combination effects on the integrity of the identified European sites through reduced water levels or water quality. **Therefore, no in-combination likely significant effects are expected with the Cotswold District Local Plan.**

Since publication of the Inspectors Interim Report, a Sustainability (Integrated) Appraisal Addendum Report (October 2016) has been published, which includes updates to the HRA Report. These updates take account of the proposed modifications to the JCS, with particular consideration of the changes to the Strategic Site Allocations. The updated HRA concludes that **the Proposed Modifications for the JCS will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.**

South Worcestershire Development Plan (adopted by Malvern Hills District Council, Worcester City Council and Wychavon District Council February 2016)

Malvern Hills, Worcester and Wychavon lie to the north-west of Cotswold District. Only Wychavon shares a boundary with Cotswold District.

Housing:

Policy SWDP 3: Employment, Housing and Retail Provision Requirement and Delivery states that about 28,400 new homes will be provided in the plan area, to include 12,150 in the Wider Worcester Area (WWA), 5,650 in Malvern Hills (excluding WWA) and 10,600 (excluding WWA) constructed in Wychavon.

Employment Land Provision:

Policy SWDP 3: Employment, Housing and Retail Provision Requirement and Delivery also states that a total of 280ha of employment land will be provided during the plan period. This includes:

- Wider Worcester Area – 120ha
- Malvern Hills (excluding WWA) – 40ha
- Wychavon (excluding WWA) – 120ha

HRA Findings:

The HRA screening for the South Worcestershire Development Plan (SWDP) Pre-Submission Consultation document concluded that there was uncertainty with regard to the potential for significant effects at European sites (**Bredon Hill SAC** and Lyppard Grange SAC) through increased disturbance. The screening also concluded that there is uncertainty with regard to the potential for significant in combination effects on seven European sites (Lyppard Grange SAC, River Wye SAC, **Severn Estuary SAC/SPA/Ramsar** & Walmore Common SPA/Ramsar) as a result of changes water levels and five European sites (**Severn Estuary SAC/SPA/Ramsar** & Walmore Common SPA/Ramsar) as a result of changes to water quality. Taking the precautionary approach these issues were progressed through to the Appropriate Assessment (AA) stage to be considered in more detail.

The AA concluded that the likelihood of proposed development increasing the number of people using Lyppard Grange Ponds SAC is minimal and that the SWDP will not have adverse effects on the integrity of the Lyppard Grange Ponds SAC through increased disturbance. Considering the location and size of proposed development in relation to **Bredon Hill SAC** and that recreational activity is not an issue at the site, **the AA also concluded that the SWDP will not have adverse effects on the integrity of the SAC either alone or in combination through increased disturbance.** The AA found that the mitigation provided by Pre-Submission policies and current regulatory processes (EA Review of Consents) would ensure that the potential impacts of proposed development on the water environment would be minimised. A HRA Addendum Report and a subsequent Further Addendum Report were produced to support the Main Modifications of the Plan which came about as a result of the Inspector's Interim and Further Interim Conclusions and consultation representations and the Stage 2 Examination in and September 2014 and September 2015 respectively. These reports concluded that the proposed Main Modifications would not significantly affect the findings of the previous HRA work. **It was therefore concluded that the SWDP will not have adverse effects on the integrity of the identified European sites either alone or in-combination and in-combination likely significant effects with the Cotswold Local Plan are not expected.**

Stratford-on-Avon District is located to the north of Cotswold District.

Housing:

Policy CS16 of the Draft Core Strategy states approximately 14,600 dwellings will be constructed between the period 2011-2031. The number of dwellings in the relevant areas to be provided are as follows:

- Stratford-upon-Avon: approximately 3,500
- Main Rural Centres: approximately 3,800
- New Settlement at Gaydon/Lighthorne Heath: approximately 2,300 homes
- New Settlement at Long Marston Airfield: approximately 2,100 homes
- Local Service Villages: approximately 2,000 homes
- Large Rural Brownfield Sites: approximately 1,165 homes
- Other Rural Locations: approximately 750 homes

Employment Land Provision:

Policy CS22 states that an additional 35ha of employment land will be provided over the plan period 2011-2031. The primary use of this land will be for B1a (offices) and B1b (research and development). A further 19ha is allocated through the plan to meet the specific needs of Redditch and 100ha is identified for the express purpose of allowing for the expansion of Jaguar Land Rover at Gaydon/Lighthorne Heath.

HRA Findings:

The HRA Screening Report for the Core Strategy (April 2014) concluded that the Core Strategy is not likely to lead to adverse effects on any European sites either alone or in-combination with other plans and the August 2015 update to the HRA concluded that there was no change to the results of the 2014 HRA. Although earlier assessment in June 2012 identified the capacity to treat wastewater as a potential issue, no adverse effects were reported as anticipated as a result of proposals in the plan. This is as a result of other plans (namely the draft Severn Trent Water Resources Management Plan, May 2013) having addressed the issue of wastewater treatment and Habitat Regulations issues. **Therefore, no in-combination likely significant effects are expected with the Cotswold District Local Plan.**

Appendix 4

HRA Screening of the Local Plan Submission Draft Regulation 19 and Focussed Changes

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|---------------------------------------|--|--|
| Vision and Strategic Objectives | | | | | |
| Vision | None – development will not occur as a direct result of the Vision for Cotswold District; rather the Vision will be implemented through the more detailed policies in the Local Plan which are being assessed separately for their potential to have significant effects on European sites. | N/A | N/A | N/A | N/A |
| Strategic objective 1: Natural and historic environment | None directly – the strategic objective will be implemented through more detailed policies which are being assessed separately for their potential to have significant effects on European sites. | N/A | N/A | This strategic objective should help to provide mitigation for the potential impacts of the development proposed elsewhere in the Local Plan as it aims to conserve and enhance the high quality and diversity of the natural environment, which is taken to include European sites. To improve the mitigation provided by this objective, specific reference could be made to SACs, SPAs and Ramsar sites. | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|---------------------------------------|--|--|
| Strategic objective 2: Population and housing | None directly – the strategic objective will be implemented through more detailed policies which are being assessed separately for their potential to have significant effects on European sites. | N/A | N/A | N/A | N/A |
| Strategic objective 3: Local economy | None directly – the strategic objective will be implemented through more detailed policies which are being assessed separately for their potential to have significant effects on European sites. | N/A | N/A | N/A | N/A |
| Strategic objective 4: Infrastructure and service provision | None directly – the strategic objective will be implemented through more detailed policies which are being assessed separately for their potential to have significant effects on European sites. | N/A | N/A | N/A | N/A |
| Strategic objective 5: Sustainable travel | None directly – the strategic objective will be implemented through | N/A | N/A | This strategic objective should help to provide mitigation for the potential | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|---|--|--|--|
| | more detailed policies which are being assessed separately for their potential to have significant effects on European sites. | | | impacts of the development proposed elsewhere in the Local Plan in relation to increased air pollution from vehicle traffic as it aims to locate development sustainably in areas with good access to jobs, services and facilities, and to improve sustainable transport links, thereby reducing car use. | |
| Strategic objective 6: Climate change and flood risk | None directly – the strategic objective will be implemented through more detailed policies which are being assessed separately for their potential to have significant effects on European sites. | N/A | N/A | This strategic objective should help to provide mitigation for the potential impacts of the development proposed elsewhere in the Local Plan in relation to increased demand for water abstraction as it aims to maximise water efficiency. | N/A |
| Local Plan Strategy | | | | | |
| DS1: Development Strategy | Development of at least 8,400 new homes. Development of at least 24ha of employment land. | Physical damage/loss of habitat. Increased air pollution. Erosion/trampling and | Physical damage/disturbance could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites | Uncertain: Until the nature of likely significant effects on the integrity of the European sites have |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|---|---|--|--|
| | <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>general disturbance from recreation.</p> | <p>SAC which lie slightly within the District boundary. However, neither SAC is within or adjacent to any of the principal settlements named in the policy, where development would be located – the closest settlements to an SAC are Down Ampney and South Cerney which are still well outside of North Meadow and Clattinger Farm SAC.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger</p> | <p>(including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> | <p>been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution or erosion/trampling and general disturbance from recreation.</p> <p>Likely significant effects in relation to physical damage/loss of habitat can be ruled out due to the distance of the principal settlements named in the policy from European sites.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|--|--|---|--|---|
| | | | Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | | |
| DS2: Development within Development Boundaries | Development (type uncertain, but could include housing, employment etc.) Increased vehicle traffic Increase in recreation activities | Erosion/trampling and general disturbance from recreation. Increased air pollution. | Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use. The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to | Uncertain: While the development resulting from this policy would be located within the defined development boundaries which are located outside of European sites (and therefore physical damage/loss of habitat is not expected to occur), the development could contribute to an increase in vehicle traffic and recreation pressure which could affect the European sites identified. This is particularly likely in relation to development at Down Ampney and South Cerney which are within fairly |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|--|---|---|---|--|
| | | | | reduce pressure on European sites for recreation space. | close proximity of North Meadow and Clattinger Farm SAC. |
| <p>DS3: Residential Development Outside the Principal Settlements (Renamed 'Residential Development in Non-Principal Settlements' in the Focussed Changes)</p> | <p>Housing development Increased vehicle traffic Increase in recreation activities</p> | <p>Physical damage/loss of habitat. Erosion/trampling and general disturbance from recreation. Increased air pollution.</p> | <p>Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to</p> | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them ("that would adversely affect their integrity" in the proposed Focussed Change; proposed Policy EN9). Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use. The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for</p> | <p>Uncertain: The policy could result in housing development outside of the main settlements which could result in damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, housing development resulting from the policy could contribute to an increase in vehicle traffic and recreation pressure which could affect the European sites identified.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|--|---|--|
| | | | their closer proximity to the District. | recreation space. | |
| Delivering the Strategy | | | | | |
| SA1: Strategy Delivery - South Cotswolds Sub-Area | Infrastructure development | N/A | N/A | N/A | No: The infrastructure to be developed as a result of funding required by this policy would be located in and around Cirencester and the south of the District, and none of the identified road improvement schemes are within proximity of European sites. |
| S1: Cirencester Town (reference to the strategic site at Chesterton removed from policy S1 in the focussed changes as | Housing development (approximately 31 dwellings across the allocated sites plus 2,350 at the strategic site south of Chesterton, see policy | Erosion/trampling and general disturbance from recreation. Increased air pollution. | Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for | Uncertain: The policy relates to development at Cirencester which is located away from the European sites; therefore physical |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-----------------------|---|--|---|--|---|
| it repeats Policy S2) | <p>S2 below)</p> <p>Employment development (over 11ha across the allocated sites)³⁴</p> <p>Mixed use development</p> <p>Infrastructure development</p> <p>Increased vehicle traffic</p> <p>Increase in recreation activities</p> | | <p>those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The measures within the policy to improve sustainable transport links may help to mitigate the likely increases in vehicle traffic from development</p> | <p>loss of or damage to habitat is not expected. However, the policy could contribute to an increase in vehicle traffic and recreation pressure which could affect the identified European sites.</p> |

³⁴ The proposed Focussed Change for this policy identifies the Brewery Car Park (CIR_E16A) as an additional allocated site, but this does not alter the HRA screening findings.

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|---|--|---|---|
| | | | | at Cirencester. | |
| S2: Strategic Site South of Chesterton, Cirencester | <p>Mixed-use development including up to 2,350 new homes and approximately 9.1ha of employment land, as well as supporting infrastructure and facilities.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European sites are located within very close proximity of this proposed strategic site. The nearest European site is North Meadow and Clattinger Farm SAC which is approximately 5km to the south, while Rodborough Common SAC and Cotswold Beechwoods SAC are located around 15km to the west so these sites are not expected to experience direct physical damage or loss of habitat as a result of development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation</p> | <p>Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them.</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>Open space is to be provided within the development site, which</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased recreation resulting from the development proposed at this strategic site, particularly in light of the scale of development proposed there.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-----------------------------|--|--|--|--|---|
| | | | pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | may help to mitigate potential impacts on nearby European sites, in particular North Meadow and Clattinger Farm SAC, as a result of increased recreation pressure. However, it is uncertain how effective this will be at mitigating increased recreational use of those sites, as it will depend on factors such as the comparable nature and quality of the greenspace to be provided. | |
| S3: Cirencester Town Centre | Development in Cirencester town centre (as described in policies S3A to S3F) Increased vehicle traffic. | Increased air pollution. | Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). | Uncertain: The policy relates to development at Cirencester town centre which is located away from the European sites; therefore physical loss of or damage to habitat is not expected. However, the policy could contribute to an increase in vehicle traffic which could affect the identified |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---------------------------------------|--|--|---|--|---|
| | | | | <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The measures within the policy to improve sustainable transport links may help to mitigate the likely increases in vehicle traffic from development at Cirencester.</p> | European sites. |
| S3A: Retail and Main Town Centre Uses | <p>Retail development (5,600 sq.m of comparison retail floorspace and 1,300 sq.m of net convenience floorspace; reduced to 2,100 sqm comparison retail and 400 sqm convenience retail in the Focussed Changes) in Cirencester.</p> <p>Development of town centre uses.</p> <p>Increased vehicle traffic.</p> | Increased air pollution. | Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote</p> | <p>Uncertain: The policy relates to development within Cirencester town centre which would therefore be located away from the European sites, and so physical loss of or damage to habitat is not expected. However, the policy could contribute to an increase in vehicle traffic which could affect the identified European sites.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--------------------------------------|---|---|---|---|---|
| | | | | <p>the use of sustainable modes of transport and to reduce car use.</p> <p>The measures within the policy to improve sustainable transport links may help to mitigate the likely increases in vehicle traffic from development at Cirencester.</p> | |
| S3B: Access, Transport and Parking | None – the policy will not itself result in development. | N/A | N/A | The measures in this policy may provide mitigation for the potential impacts of development proposed through other Local Plan policies in relation to increased vehicle traffic, including the proposed improvements to walking and cycle routes and public transport infrastructure. | N/A |
| S3C: Tourism and Cultural Facilities | <p>Development of tourism and cultural facilities including a hotel in Cirencester.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) | Uncertain: The policy relates to development within Cirencester town centre which would therefore be located away from the European sites, and |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|--|--|---|
| | | | <p>200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> | <p>so physical loss of or damage to habitat is not expected. However, the policy could contribute to an increase in vehicle traffic and pressure for recreation space which could affect the identified European sites.</p> |
| S3D: Enhancing Environmental Quality | None – the policy will not itself result in development. | N/A | N/A | N/A | N/A |
| S3E: Green Infrastructure and Play Space | None – the policy will not itself result in development. | N/A | N/A | N/A | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|--|--|---|--|---|
| S3F: Redevelopment of town centre sites | Redevelopment of town centre sites in Cirencester. Increased vehicle traffic. | Increased air pollution. | Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The measures within the policy to improve sustainable transport links may help to mitigate the likely increases in vehicle traffic from development at Cirencester.</p> | <p>Uncertain: The policy relates to development within Cirencester town centre which would therefore be located away from the European sites, and so physical loss of or damage to habitat is not expected. However, the policy could contribute to an increase in vehicle traffic which could affect the identified European sites.</p> |
| S4: Down Ampney | Development of 28 homes including at Dukes Field, | Erosion/trampling and general disturbance from | No European sites are within or adjacent to | Policy EN7: Biodiversity and Geodiversity – | Uncertain: Until the nature of likely |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|--|--|---|--|--|
| | <p>Buildings at Rooktree Farm and Land at Broadleaze.</p> <p>Infrastructure provision.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>recreation.</p> <p>Increased air pollution.</p> | <p>Down Ampney, with the nearest site being North Meadow and Clattinger Farm SAC which is approximately 2km to the south west so would not be expected to experience physical damage or habitat loss from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to</p> | <p>Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The proposed strategy for Down Ampney states that provision will be required for new natural open</p> | <p>significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased recreation resulting from the development proposed at Down Ampney.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|--|---|--|--|
| | | | the District. | <p>space or a pocket park in Down Ampney as part of any development proposals. This may help to mitigate the potential impacts of increased recreation at European sites, in particular North Meadow and Clattinger Farm SAC. However, it is uncertain how effective this will be at mitigating increased recreational use of those sites, as it will depend on factors such as the comparable nature and quality of the greenspace to be provided.</p> <p>The proposed strategy also requires improvements to public transport provision, particularly to Cirencester and Swindon, which may help to mitigate the potential impacts of development in relation to increased air pollution from vehicle traffic.</p> | |
| S5: Fairford | Housing development (49 dwellings at Land behind | Erosion/trampling and general disturbance from | No European sites are within very close proximity | Policy EN7 (EN9 in the Focussed Changes): | Uncertain: Until the nature of likely |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|--|--|--|--|---|
| | <p>Milton Farm and Bettertons Close) and 28 dwellings at Land to rear of Faulkner Close, Horcott).</p> <p>Improvements to the provision of footpath and cycle links between Fairford and the riverside, the Cotswold Water Park and canal route.</p> <p>Improvements to the multi-use path from Fairford to Lechlade along the line of the former railway.</p> <p>Increased recreation pressure.</p> <p>Increased vehicle traffic.</p> | <p>recreation.</p> <p>Increased air pollution.</p> | <p>of Fairford, with the nearest site being North Meadow and Clattinger Farm SAC which lies approximately 10km to the south west so would not be expected to experience direct physical damage or loss of habitat from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to</p> | <p>Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them.</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The proposed strategy for Fairford supports the provision of footpath and cycle links to the riverside, the Cotswold Water Park and canal route, which may help mitigate the</p> | <p>significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and disturbance from recreation resulting from the development proposed at Fairford.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|--|---|---|--|--|
| | | | the District. | potential impacts of the housing and other development in relation to increased air pollution from vehicle traffic. Easy access to those areas for recreation may also help to mitigate any increase in recreation pressure at European sites, particularly North Meadow and Clattinger Farm SAC. | |
| S6: Kemble | <p>Development of 12 homes at Land at Station Road, 13 homes at Land between Windmill Road and A429 and 11 homes at Land to North West of Kemble Primary School.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European Sites are within very close proximity of Kemble, with the nearest site being North Meadow and Clattinger Farm to the south and Rodborough Common to the west, both of which lie at least 5km away so would not be expected to experience physical damage or disturbance from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and</p> | <p>Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them.</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|---|--|---|---|
| | | | <p>Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The proposed strategy for Kemble supports improved bus and cycle links to Kemble Enterprise Park, and a safe footpath between Kemble and Ewen, which may help to mitigate the potential impacts of the housing development in relation to increased air pollution from vehicle traffic.</p> | <p>recreation resulting from the development proposed at Kemble.</p> |
| S7: Lechlade | <p>Development of 18 homes at Land West of Orchard Close, Downington and Land South of Butler's Court.</p> <p>Development of 1.25ha of employment land at Land North of Butler's Court.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European sites are within very close proximity of Lechlade-on-Thames, with the nearest site being North Meadow and Clattinger Farm SAC which lies approximately 12km to the south west so would not be expected to</p> | <p>Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|--|---|---|---|
| | <p>Development of a hotel or similar tourist accommodation.</p> <p>Installation of footbridge over the River Thames.</p> <p>Provision of a small car park.</p> <p>Regeneration of the riverside area.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | | <p>experience physical damage or disturbance from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>measures) will be safeguarded from development that could adversely affect them.</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The strategy for Lechlade-on-Thames requires the provision of safe footpath and cycle links to Cotswold Water Park, canal route and Fairford, which may help to mitigate the potential impacts of the development in relation to air pollution from increased vehicle traffic.</p> | <p>as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution or erosion/trampling or general disturbance from increased recreation resulting from the development proposed at Lechlade-on-Thames.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|---|---|---|--|
| S8: South Cerney | Protection of existing employment site but no new housing or employment development. | N/A | N/A | The strategy for South Cerney requires developments to contribute to a new and improved cycle path from South Cerney to Cirencester, the Cotswolds Water Park and Duke of Gloucester Barracks, which may encourage the use of more sustainable modes of transport | N/A |
| S9: Tetbury | <p>Development of 9 homes at the Former Matbro site, 18 homes at Northfield Garage and 43 homes at Land adjacent to Blind Lane.</p> <p>Development of 2.08ha of employment land as an extension to Tetbury Industrial Estate.</p> <p>Development of/ improvement community services and facilities.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European Sites are within very close proximity of Tetbury, with the nearest sites being North Meadow and Clattinger Farm SAC and Rodborough Common SAC which lie around 10km from Tetbury so would not be expected to experience physical disturbance or damage from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as</p> | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution or erosion/trampling or general disturbance from increased recreation resulting from the</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|---|--|--|
| | | | <p>those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The proposed Focussed Change for this policy provides additional explanation of how housing and employment sites within the inner Source Protection Zone for Long Newton Public Water Abstraction need to be designed to avoid groundwater pollution. This strengthens the protection of water quality and quantity; however the HRA screening findings are unaltered as water quality and quantity impacts remain screened out.</p> | development proposed at Tetbury. |
| SA2: Strategy Delivery - Mid-Cotswolds Sub-Area | Infrastructure development | N/A | N/A | N/A | No: The infrastructure to be developed as a result of funding |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|---|---|---|--|
| | | | | | required by this policy would be located away from sensitive European sites. |
| S10: Andoversford | <p>Development of 25 homes on land to the rear of Templefields and Crossfields.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European sites are within very close proximity of Andoversford, with the nearest sites being Dixon Wood SAC to the north and Cotswold Beechwoods SAC to the west, both of which are at least 12km away so would not be expected to experience physical disturbance or damage from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with</p> | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution or erosion/trampling or general disturbance from increased recreation resulting from the development proposed at Andoversford.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|--|--|---|--|
| | | | <p>tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>reduce pressure on European sites for recreation space.</p> <p>The strategy for Andoversford states that contributions will be sought towards bus routes connecting the village with other key settlements, which may help to mitigate the potential effects of the housing development in terms of increased air pollution from vehicle traffic.</p> <p>The strategy for Andoversford also states that provision will be required for new natural open space or a pocket park in Andoversford as part of any development proposals, which may help to mitigate the potential impacts of increased recreation at European sites, in particular Dixon Woods and Cotswold Beechwoods SAC.</p> <p>However, it is uncertain how effective this will be at mitigating increased recreational use of those</p> | |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---------------------------|--|---|---|--|--|
| | | | | sites, as it will depend on factors such as the comparable nature and quality of the greenspace to be provided. | |
| S11: Bourton-on-the Water | <p>Housing development (32 dwellings at Countrywide Stores site)</p> <p>Development of 3.38ha of employment land at land north of Bourton Industrial Estate/Business Park.</p> <p>Development of a multi-purpose community facility.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European sites are within very close proximity of Bourton-on-the-Water, with the nearest site being Dixton Wood SAC which is approximately 20km to the north west so would not be expected to experience physical damage or disturbance from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European</p> | <p>Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them.</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution or erosion/trampling or general disturbance from increased recreation resulting from the development proposed at Bourton-on-the-Water.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|---|--|--|--|
| | | | sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | recreation space. | |
| S12: Northleach | <p>Development of 22 homes at land north west of Hammond Drive and Midwinter Road and land adjoining East End and Nostle Road.</p> <p>Tourism-related developments including provision of a small visitor's car park.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European Sites are within close proximity of Northleach, with the nearest site being Cotswold Beechwoods SAC which lies approximately 18km to the west so would not be expected to experience physical damage or disturbance from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation</p> | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution or erosion/trampling or general disturbance from increased recreation resulting from the development proposed at Northleach.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-----------------------|---|---|---|---|---|
| | | | pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space. | |
| S13: Stow-on-the-Wold | <p>Development of 10 homes at Stow Agricultural Services, Lower Swell Road.</p> <p>Development of a town museum.</p> <p>New community facilities.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | No European Sites are within very close proximity of Stow-on-the-Wold, with the nearest site being Dixton Wood SAC which lies around 22km to the west so would not be expected to experience direct physical damage or disturbance from the development proposed. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to</p> | Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased recreation resulting from the development |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|--|--|--|---|---|
| | | | Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | reduce car use. The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space. | proposed at Stow-on-the-Wold. |
| S14: Upper Rissington | Protection of existing employment site but no new housing or employment development. | N/A | N/A | N/A | N/A |
| SA3: Strategy Delivery - North Cotswolds | Infrastructure development | N/A | N/A | N/A | No: The infrastructure to be developed as a result of funding required by this policy would be located away from sensitive European sites. |
| S15: Blockley | Development of 29 homes at Land at Sheafhouse | Erosion/trampling and general disturbance from | No European sites are within very close proximity | Policy EN7: Biodiversity and Geodiversity – | Uncertain: Until the nature of likely |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|--|--|--|---|
| | <p>Farm and The Limes, Station Road.</p> <p>Development of a new youth shelter.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>recreation.</p> <p>Increased air pollution.</p> | <p>of Blockley, with the nearest sites being Dixon Wood SAC and Bredon Hill SAC, both of which are approximately 15km to the west so would not be expected to experience physical disturbance or damage from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to</p> | <p>Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The proposed strategy for Blockley refers to the provision of improved footpaths and cycle links,</p> | <p>significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased recreation resulting from the development proposed at Blockley.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-----------------------|--|---|---|--|--|
| | | | the District. | which may help to mitigate the potential effects of the housing development in relation to increased air pollution from vehicle traffic. | |
| S16: Chipping Campden | <p>Development of 120 homes at land at Aston Road and Barrell's Pitch and Land North of Cherry Trees, Aston Road.</p> <p>Development of 0.67ha of employment land at Battlebrook/extension to Campden Business Park.</p> <p>Provision of a car and coach park at Wold's End Orchard.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European sites are within very close proximity of Chipping Campden, with the nearest site being Bredon Hill SAC which is approximately 16km to the west so would not be expected to experience physical damage or disturbance from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation</p> | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased recreation resulting from the development proposed at Chipping Campden.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|---|--|---|---|--|
| | | | <p>pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> <p>The proposed strategy for Chipping Campden requires opportunities to be taken to improve sustainable transport links with surrounding villages and promotes the provision of a new railway station, which may help to mitigate the potential impacts of the housing development in terms of increased air pollution from vehicle traffic,</p> <p>The proposed strategy for Chipping Campden also states that provision will be required for new natural open space or a pocket park in Chipping Campden as part of any development proposals, which may help to mitigate the potential impacts of increased recreation at European sites, in particular Bredon</p> | |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-----------------------|---|---|--|--|---|
| | | | | <p>Hill SAC. However, it is uncertain how effective this will be at mitigating increased recreational use of those sites, as it will depend on factors such as the comparable nature and quality of the greenspace to be provided.</p> <p>Further potential mitigation measures, if identified as being needed, could the upgrading of water treatment infrastructure.</p> | |
| S17: Mickleton | Protection of existing employment site but no new housing or employment development. | N/A | N/A | N/A | N/A |
| S18: Moreton-in-Marsh | <p>Development of 21 homes at the Former Hospital site and 91 and 28 dwellings at Land south east of Fosseway Avenue.</p> <p>Development of 7.13ha of employment land at the Fire Service College site and 2.03ha of employment</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | No European Sites are within close proximity of Moreton-in-Marsh, with the nearest site being Dixton Wood SAC which lies approximately 22km to the west so would not be expected to experience physical damage or disturbance from | Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be | Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and effective mitigation measures worked up as required, it is not |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-------------------|--|---|--|---|--|
| | <p>land at Land at Evenlode Road.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | | <p>development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>safeguarded from development that could adversely affect them.</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> | <p>possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased recreation resulting from the development proposed at Moreton-in-Marsh.</p> |
| S19: Willersey | <p>Development of 5 homes at Garage Workshop and Garden behind the Nook, Main Street and 49 homes as part of the mixed use development on land north</p> | <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>No European Sites are within very close proximity of Willersey, with the nearest sites being Dixon Wood SAC and Bredon Hill SAC which lie between 10-15km from Willersey so</p> | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for</p> | <p>Uncertain: Until the nature of likely significant effects on the integrity of the European sites have been examined in more detail, and</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|--|---|--|
| | <p>of B4632.</p> <p>Development of 1.97ha of employment land as part of the mixed use development on land north of B4632.</p> <p>Increased vehicle traffic.</p> <p>Increase in recreation activities.</p> | | <p>would not be expected to experience physical damage or disturbance from development.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> | <p>effective mitigation measures worked up as required, it is not possible to rule out the possibility of likely significant effects associated with increased air pollution and erosion/ trampling or general disturbance from increased recreation resulting from the development proposed at Willersey.</p> |
| Housing to Meet Local Needs | | | | | |
| H1: Housing Mix and Tenure to Meet Local | None – the policy will not itself result in new | N/A | N/A | N/A | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|--|--|--|--|---|
| Needs | development, rather it sets out criteria for housing developments coming forward under other policies which are assessed separately. | | | | |
| H2: Affordable Housing in Principal Settlements (Renamed just 'Affordable Housing' in Focussed Changes) | None – the policy will not itself result in new development, rather it sets out criteria for housing developments coming forward under other policies which are assessed separately. | N/A | N/A | N/A | N/A |
| H3: Affordable Housing Outside Principal Settlements (Renamed 'Rural Exception Sites' in Focussed Changes) | Housing development on exceptions sites Increased vehicle traffic Increase in recreation activities | Physical damage/loss of habitat. Erosion/trampling and general disturbance from recreation. Increased air pollution. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them ("that would adversely affect their integrity" in the proposed Focussed Change; Policy EN9). Policy INF3: Sustainable Transport encourages | Uncertain: The policy could result in affordable housing development outside of the main settlements on land which would not normally be permitted for housing. This could result in damage/loss of habitat at the identified European sites if the development takes place in those parts of the district. In |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|--|---|---|
| | | | Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | developments to promote the use of sustainable modes of transport and to reduce car use. The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space. | addition, housing development resulting from the policy could make a small contribution to an increase in vehicle traffic and recreation pressure which could affect the European sites identified. |
| H4: Specialist Accommodation for Older People | Development of specialist accommodation for older people Increased vehicle traffic | Physical damage/loss of habitat. Increased air pollution. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). Policy INF3: Sustainable Transport encourages | Uncertain: The policy could result in development which could lead to damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, development resulting from the policy could make a small contribution to an increase in vehicle traffic which could affect the |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|--|--|---|--|---|
| | | | | developments to promote the use of sustainable modes of transport and to reduce car use. | European sites identified, although the scale of development resulting from the policy is likely to be limited. Increased recreation pressure at European sites is not expected to result from this type of development. |
| H5: Dwellings for Rural Workers Outside Settlements | Housing development in rural areas Increased vehicle traffic Increase in recreation activities | Physical damage/loss of habitat. Erosion/trampling and general disturbance from recreation. Increased air pollution. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. Erosion/trampling and disturbance from increased recreation | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable | Uncertain: The policy could result in housing development in rural areas which could result in damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, housing development resulting from the policy could make a small contribution to an increase in vehicle traffic and recreation pressure |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|--|--|--|--|---|
| | | | pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. | modes of transport and to reduce car use. The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space. | which could affect the European sites identified, although the scale of development resulting from the policy is likely to be small. |
| H6: Removal of Occupancy Conditions | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| H7: Gypsy, Traveller and Travelling Showpeople Accommodation | Development of sites for Gypsies, Travellers and Travelling Showpeople Increased vehicle traffic Increase in recreation activities | Physical damage/loss of habitat. Erosion/trampling and general disturbance from recreation. Increased air pollution. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC as they lie slightly within the District boundary Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). | Uncertain: The policy could result in the development of sites for Gypsies, Travellers and Travelling Showpeople and the preferred site at South Cerney would be in fairly close proximity of North Meadow and Clattinger Farm SAC (although not close enough to result in physical damage/loss of |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|---|---|--|
| | | | <p>network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> | <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> | <p>habitat). There is also the potential for sites to come forward in other parts of the District, other than the sites named in the policy. This could result in damage/loss of habitat at those identified European sites if the development takes place in those parts of the District. In addition, development resulting from the policy could contribute to an increase in vehicle traffic and recreation pressure which could affect the European sites identified.</p> |
| Economy, including Retailing and Tourism | | | | | |
| EC1: Employment Development | None – the policy will not itself result in new development, rather it sets out criteria for economic developments coming forward under other | N/A | N/A | N/A | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|--|--|--|
| | policies which are assessed separately. | | | | |
| EC2: Safeguarding Employment Sites | Employment development within the boundaries of existing and allocated employment sites, but no entirely new development. | N/A | N/A | N/A | N/A |
| EC3: Proposals for all Types of Employment Generating Uses | Employment development Increased vehicle traffic | Physical damage/loss of habitat. Increased air pollution. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use. | Uncertain: The policy could result in employment development which could lead to damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, development resulting from the policy could contribute to an increase in vehicle traffic which could affect the European sites identified. |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|----------------------------|--|---|--|--|---|
| EC4: Special Policy Areas | Employment development within the boundaries of existing employment sites, all of which are located away from European sites, but no entirely new development. | N/A | N/A | N/A | N/A |
| EC5: Rural Diversification | <p>Development associated with agricultural diversification</p> <p>Increased vehicle traffic</p> <p>Increase in recreation activities</p> | <p>Physical damage/loss of habitat.</p> <p>Erosion/trampling and general disturbance from recreation.</p> <p>Increased air pollution.</p> | <p>Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> <p>Increased air pollution in and around the District could affect Rodborough</p> | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green</p> | <p>Uncertain: The policy could result in development associated with agricultural diversification which could lead to damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, development resulting from the policy could contribute to an increase in vehicle traffic and pressure for recreation space which could affect the European sites identified.</p> |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|--|--|--|--|--|
| | | | Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space. | |
| EC6: Conversion of Rural Buildings | Conversion of existing buildings in rural areas, but no new development. | N/A | N/A | N/A | N/A |
| EC7: Retail Hierarchy (Renamed just 'Retail' in Focussed Changes) | The policy relates to development within urban centres, which would help to steer it away from sensitive European sites. | N/A | N/A | N/A | N/A |
| EC8: Main Town Centre Uses | The policy relates to development within urban centres, which would help to steer it away from sensitive European sites. | N/A | N/A | N/A | N/A |
| EC9: Retail Impact Assessments | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| EC10: Development of Tourist Facilities and Visitor Attractions | Tourism-related development Increased vehicle traffic Increase in recreation | Physical damage/loss of habitat. Erosion/trampling and general disturbance from | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites | Uncertain: The policy could result in tourism-related development which could lead to |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|-----------------------------|---|--|---|---|--|
| | activities | recreation. Increased air pollution. | which lie slightly within the District boundary. Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use. The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space. | damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, development resulting from the policy could contribute to an increase in vehicle traffic and pressure for recreation space which could affect the European sites identified. |
| EC11: Tourist Accommodation | Development of tourist accommodation Increased vehicle traffic Increase in recreation | Physical damage/loss of habitat. Erosion/trampling and general disturbance from | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites | Uncertain: The policy could result in tourism-related development which could lead to |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|---|--|--|--|
| | activities | recreation. Increased air pollution. | <p>which lie slightly within the District boundary.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC are most likely to be affected due to their closer proximity to the District.</p> <p>Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network.</p> | <p>(including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> | damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, development resulting from the policy could contribute to an increase in vehicle traffic and pressure for recreation space which could affect the European sites identified. |
| Design | | | | | |
| D1: Design (Moved to The Built, Natural and Historic | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|---------------------------------------|---|--|
| Environment chapter and renamed 'Policy EN2 The Built Environment' in Focussed Changes) | | | | | |
| Natural and Historic Environment | | | | | |
| EN1: Natural and Historic Environment (Renamed 'Built, Natural and Historic Environment' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | This policy should help to provide mitigation for the potential impacts of development proposed elsewhere in the Local Plan as it requires development to promote the protection and enhancement of environmental assets, which is taken to include European sites. It also refers to habitat creation and seeking improvements to air quality (which could otherwise affect biodiversity at European sites). | N/A |
| EN2: The Wider Natural and Historic Landscape (Renamed 'Policy EN4' in Focussed | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|---------------------------------------|--|--|
| Changes) | | | | | |
| EN3: Cotswolds Area of Outstanding Natural Beauty (AONB) (Renamed 'Policy EN5' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| EN4: Special Landscape Areas (Renamed 'Policy EN6' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| EN5: Trees, Hedgerows and Woodlands (Renamed 'Policy EN7' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| EN6: Biodiversity and Geodiversity: Features, Habitats and Species (Renamed 'Policy EN8' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | This policy should provide mitigation for the potential impacts of the development proposed elsewhere in the Local Plan as it requires development to conserve and enhance biodiversity and avoid habitat loss. It | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|---------------------------------------|---|--|
| | | | | also states that developments that would have an adverse impact on internationally protected species will not be permitted. | |
| EN7: Biodiversity and Geodiversity: Designated Sites (Renamed 'Policy EN9' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | <p>This policy should provide mitigation for the potential impacts of the development proposed elsewhere in the Local Plan as it states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them.</p> <p>The proposed Focussed Change for this policy alters the wording of this policy to safeguard sites from “development that could adversely affect their integrity”, rather than just “adversely affect them”. This provides more explicit protection for European sites and their qualifying features.</p> | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|---------------------------------------|--|--|
| EN8: Designated Heritage Assets: Conservation Areas (Renamed 'Policy EN11' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| EN9: Conversion of Non-Domestic Historic Buildings (Designated and Non-Designated Heritage Assets) (Renamed 'Policy EN13' in Focussed Changes) | Conversion of existing buildings but no new development. | N/A | N/A | N/A | N/A |
| New policy in Focussed Changes: EN10: Designated Heritage Assets | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| EN10: Non-Designated Heritage Assets (Renamed 'Policy EN12' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|---------------------------------------|---|--|
| EN11: Pollution and Contaminated Land (Renamed 'Policy EN15' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| EN12: Local Green Spaces (Renamed 'Policy EN3' in Focussed Changes) | None – the policy will not itself result in new development. | N/A | N/A | This policy should provide mitigation for the potential impacts of the development proposed elsewhere in the Local Plan as it supports the designation of local green spaces which could help to mitigate the potential impacts of development in terms of increased recreation pressure at nearby European sites. However, it is uncertain how effective this will be at mitigating increased recreational use of European sites, as it will depend on factors such as the comparable nature and quality of the green spaces covered by this policy. | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|--|--|--|--|--|
| Infrastructure | | | | | |
| INF1: Infrastructure Delivery | None – the policy will not itself result in new development; rather it relates to funding mechanisms for infrastructure improvements to support development coming forward under other policies. | N/A | N/A | N/A | N/A |
| INF2: Social and Community Infrastructure | Development of community services and facilities Increased vehicle traffic | Physical damage/loss of habitat. Increased air pollution. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road network. | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable | Uncertain: The policy could result in the development of community services/facilities which could lead to damage/loss of habitat at the identified European sites if the development takes place in those parts of the District. In addition, development resulting from the policy could contribute to an increase in vehicle traffic which could |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|---------------------------------------|--|--|
| | | | | modes of transport and to reduce car use. | affect the European sites identified. |
| INF3: Sustainable Transport | None – the policy will not itself result in new development. | N/A | N/A | This policy should provide mitigation for the potential impacts of the development proposed elsewhere in the Local Plan in relation to increased air pollution at European sites. | N/A |
| INF4: Highway Safety | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| INF5: Parking Provision | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| INF6: Vale of Evesham Heavy Goods Vehicle Control Zone | None – the policy will not itself result in new development. | N/A | N/A | N/A | N/A |
| INF7: Green Infrastructure | None – the policy will not itself result in new development. | N/A | N/A | This policy should provide mitigation for the potential impacts of the development proposed elsewhere in the Local Plan in relation to increased recreation pressure at European sites as it requires that | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|---------------------------------------|---|--|
| | | | | development proposals contribute to the protection and enhancement of existing green infrastructure and/or the delivery of new green infrastructure. However, it is uncertain how effective this will be at mitigating increased recreational use of European sites, as it will depend on factors such as the comparable nature and quality of the green infrastructure covered by this policy. | |
| INF8: Managing Flood Risk and the Water Environment (Split in Focussed Changes into 'Policy INF8 Water Management Infrastructure' and 'Policy EN14: Managing Flood Risk') | None - the policy will not itself result in new development. | N/A | N/A | Focussed Change Policy EN14 provides some additional strength to the mitigation provided by policies EN6 (proposed EN8) and INF7 as it encourages multi-functional SuDS with wider green infrastructure benefits. Focussed Changes Policy INF8 recognises that controlling the effect of Phosphates on watercourses is partly | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|---|---|--|---|--|--|
| | | | | beyond the scope of the Local Plan but seeks to minimise impacts as far as possible within in its scope, by reducing demand for water (and therefore treatment), which would also reduce impacts relating to water abstraction. | |
| INF9: Telecommunications Infrastructure | Development of telecommunications infrastructure | Physical damage/loss of habitat. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). | No: The policy could result in the development of telecommunications infrastructure which could lead to damage/loss of habitat at the identified European sites if the development takes place in those parts of the District; however the areas of the District in which development could affect European sites are very small and policy EN7 (EN9 in the Focussed Changes) provides robust mitigation for potential impacts on |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|--|--|---|--|---|
| | | | | | European sites. |
| INF10: Renewable and Low Carbon Energy Development | Development of renewable energy infrastructure | Physical damage/loss of habitat. | Physical damage/loss of habitat could only affect North Meadow and Clattinger Farm SAC and Cotswold Beechwoods SAC which lie slightly within the District boundary. | <p>Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF10 itself states that proposals for renewable and low carbon energy development will only be permitted if any adverse impacts on biodiversity are satisfactorily mitigated.</p> | No: The policy could result in the development of renewable energy infrastructure which could lead to damage/loss of habitat at the identified European sites if the development takes place in those parts of the District; however the areas in which development could affect European sites are very small and policy EN7 (EN9 in the Focussed Changes) as well as this policy itself provide robust mitigation for potential impacts on biodiversity. |
| Spatial Issues | | | | | |
| SP1: Cheltenham and Gloucester Green Belt | The policy relates to criteria for development in the green belt, of which | N/A | N/A | N/A | N/A |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|--|--|--|---|---|
| | there is only a very small area in Cotswold District which is located away from sensitive European sites. | | | | |
| SP2: Kemble Airfield | None – the policy relates to proposals for the re-use of existing buildings at this site, which is more than 5km from the nearest European site. | N/A | N/A | N/A | N/A |
| SP3: Thames and Severn Canal | Development at the Thames and Severn Canal which is not within close proximity of any of the European sites in Cotswold District. | N/A | N/A | N/A | N/A |
| SP4: The River Thames | Development at the River Thames which is not within close proximity of any of the European sites in Cotswold District. | N/A | N/A | N/A | N/A |
| SP5: Cotswold Water Park - Post-Mineral Extraction After Use Proposals | Sport, leisure and recreation-related development Increased vehicle traffic Increase in recreation activities | Increased air pollution. Erosion/trampling and general disturbance from recreation. | Increased air pollution in and around the District could affect Rodborough Common SAC, Cotswold Beechwoods SAC and North Meadow and Clattinger Farm SAC as those sites are within 200m of the strategic road | Policy EN7: Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from | Uncertain: The policy could result in sport, leisure and recreation-related development at former mineral extraction sites in the Cotswold Water Park – while this |

| Local Plan policy | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented | European site(s) potentially affected | Potential mitigation measures – if implemented would avoid likely significant effect | Could the proposal have likely significant effects on European sites (taking mitigation into account)? |
|--|---|--|--|---|--|
| | | | <p>network.</p> <p>Erosion/trampling and disturbance from increased recreation pressure associated with tourism could potentially affect any of the European sites in and around the District although North Meadow and Clattinger Farm SAC is most likely to be affected due to its closer proximity to the development that would result from this policy.</p> | <p>development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9).</p> <p>Policy INF3: Sustainable Transport encourages developments to promote the use of sustainable modes of transport and to reduce car use.</p> <p>The protection and enhancement of green infrastructure through policy INF7: Green Infrastructure may help to reduce pressure on European sites for recreation space.</p> | <p>development would be located some distance from the nearest European sites and so wouldn't result in loss of or damage to habitat, development resulting from the policy could contribute to an increase in vehicle traffic and pressure for recreation space which could affect the European sites identified.</p> |
| SP6: Former Cheltenham to Stratford Railway Line | Development that positively contributes to the restoration of the former railway line, which is not located in close proximity of sensitive European sites. | N/A | N/A | N/A | No: Development resulting from this policy would relate specifically to the restoration of the railway which is located away from sensitive European sites. |

Appendix 5

Appropriate Assessment Matrix

To help navigate through the matrix, SAC sites are highlighted in pale blue, Ramsar sites in pale yellow and SPA sites are in grey.

In addition, Appropriate Assessment conclusions are also colour coded: green where no adverse effects on integrity will occur, orange where adverse effects are uncertain, and red where adverse effects will occur.

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|--|---|--|--|--|
| North Meadow and Clattinger Farm | Lowland hay meadows (<i>Alopecurus pratensis</i> , <i>Sanguisorba officinalis</i>) | Physical damage/loss of habitat | <p>Only two very small fragments of the SAC are located just within the District boundary in the south, and development would need to be located within those very small areas of the District in order to have an effect on the SAC in terms of physical loss of or damage to habitat from within the site boundary.</p> <p>The two tiny fragments of the SAC that extend within the District boundary are located outside of any towns or villages where development is proposed, and so could only be affected by the small-scale development that could potentially come forward anywhere in the District, i.e. that associated with policies DS3, H3, H4, H5, H7, EC3, EC5, EC10, EC11 and INF2. It is considered unlikely that such development would come forward in the location of the SAC, as both fragments within the District boundary are outside of any villages and the westerly part lies within an area of fragmented waterbodies.</p> | EN7: Biodiversity and Geodiversity: Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them (“that would adversely affect their integrity” in the proposed Focussed Change; proposed Policy EN9). | Yes: Given the very small area of the SAC that lies within the District and its peripheral location outside of any villages, and the protection that the Local Plan provides for, it is considered highly unlikely that the integrity of the SAC would be affected by the loss of or damage to habitat. |
| North Meadow and Clattinger Farm | As above. | Air pollution from increased vehicle traffic | The SAC is within 200m of the A419(T) which is the main road linking Cirencester and Swindon to the south. As Swindon is one of the main areas to which residents of Cotswold District commute outside of the District, the road may | Measures within the Local Plan seeking to encourage the use of sustainable transport (in particular policy | Yes - When considering the current condition of the site and the insignificant effect of |

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|---|---|---|--|---|
| | | | <p>see an increase in vehicle traffic as a result of housing development in Cotswold District and this may have a significant effect on the integrity of the SAC as the qualifying lowland hay meadow is potentially vulnerable to increased air pollution.</p> <p>In the absence of specific traffic modelling, it is appropriate to conclude under the precautionary principle that the contribution of air pollution from nitrogen from the Local Plan will be above the DMRB threshold. It is therefore necessary to examine the effects of resulting additional air pollution on the SAC to determine whether these would be likely to result in an adverse effect on integrity.</p> <p>The Site Improvement Plan does identify the site's habitats as being sensitive to nutrient enrichment, although it is pollution carried by surface water that is identified as the source of risk. Agriculture can contribute to nutrient enrichment via both waterborne and airborne pathways, and is likely to be the main source of nutrient enrichment from surface water pollution. The Atmospheric Nitrogen Theme Plan also identifies local agriculture sources of Nitrogen as being of 'medium' relevance at the site.</p> <p>Natural England recognises that common</p> | <p>INF3: Sustainable Transport) should provide some mitigation for the impacts of increased vehicle traffic.</p> <p>Although it is considered unlikely that the Submission Draft (Reg 19) will lead to adverse effects on the integrity of the SAC, potential options to avoid and mitigate the effects of residual air pollution associated with the A419(T) have been considered to assist in its management in the longer term. Such options include:</p> <p>Grassland management – the site has historically been subjected to nutrient enrichment from agriculture and seasonal flooding, but</p> | <p>air pollution despite the high volumes of existing traffic, the relatively small proportion of SAC within 200m of the A419(T), and the prevailing wind direction, the Appropriate Assessment concluded that the Local Plan would not have adverse effects on the integrity of North Meadow and Clattinger Farm SAC in relation to air pollution, either alone or in combination with other plans and projects.</p> |

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|---|---|--|---|--|
| | | | <p>standards monitoring is not designed to identify the effects of nutrient enrichment associated with nitrogen deposition, but at present the air quality at the site is not resulting in measurable impacts on the grassland, including the proportion of the site (c.3%) located within 200m of the A419(T). This is despite the A419(T) already carrying significant traffic volumes.</p> <p>While all sources of nitrogen would contribute to nutrient enrichment at the site, it appears that vehicle emissions are not currently a significant contributor to nitrogen at North Meadow and Clattinger Farm SAC. Furthermore, the effects of nitrogen deposition from traffic reduce dramatically with distance, such that the 200 metre threshold is at the limit of where significant effects might occur, and the SAC is located to the west of the A419(T), which means that the prevailing wind will carry emissions from traffic away from the SAC, further reducing the importance of the 200 metre threshold. This suggests that it is reasonable to assume that adverse effects on integrity of the SAC as a result of air pollution arising from the Submission Draft (Reg 19) are unlikely.</p> | <p>retains lowland meadow habitat in favourable condition largely as a result of historic favourable management. As a result, such grasslands have some resilience to the effects of nutrient input through provision of appropriate management to ensure that the growth of competitive grasses are kept under control. Changes in the frequency and timing of hay cutting and the duration, timing and stocking rates of grazing animals may help to limit the effects of air pollution in the future.</p> <p>Control of flooding - As described above, improved control of</p> | |

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|---|---|--|---|--|
| | | | | <p>flooding and drainage may help to control the frequency and duration of flooding in the future, and would thereby enable the effects of agricultural nutrient enrichment to be addressed. It is understood through discussions with Natural England that such measures have recently been promoted as a management option at the site.</p> <p>Provision of screening between the A419(T) and the SAC, such as the provision of tall trees and planting of dense scrub and woodland habitat may help to provide a habitat buffer which could take up a proportion of the deposited nitrogen, thereby helping to</p> | |

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|---|---|---|--|--|
| | | | | limit the extent of nitrogen deposition contributed from road traffic. | |
| North Meadow and Clattinger Farm | As above. | Erosion/trampling or general disturbance from increased recreation pressure | <p>The qualifying lowland hay meadows are known to be vulnerable to the potential impacts of increased recreation pressure - Natural England's Site Improvement Plan for the SAC³⁵ identifies public access/disturbance as one of the key threats facing the site, with visitor pressure being a particular issue during the flowering time of Snake's-head fritillary, leading to localised damage on sites in the SAC. Natural England also noted in an earlier consultation response that the current level of recreational use of this site is considered to be at or above capacity.</p> <p>However, as the SAC is on the southern edge of the District, most of the towns and villages where housing development is proposed in the Local Plan are located at least several kilometres from the SAC, indicating that they may be unlikely to make use of the site for day-to-day activities such as dog walking.</p> | <p>Site use is managed and restricted. Natural England has noted that the site is managed as a National Nature Reserve, with public access along marked routes from March until August.</p> <p>Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at sensitive European sites, and a number of</p> | Yes: In light of the mitigation identified, in particular the existing management of the SAC, the Local Plan is not considered to have adverse effects on the integrity of North Meadow and Clattinger Farm SAC as a result of increased recreation pressure. |

³⁵ Natural England (November 2014) Improvement Programme for England's Natura 2000 Sites (IPENS) Planning for the Future: Site Improvement Plan - North Meadow & Clattinger Farm

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|--|---|--|--|---|
| | | | | the policies relating to specific towns and villages include similar provisions. | |
| Cotswold Beechwoods | Asperulo-Fagetum beech forests Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) | Physical damage/loss of habitat | Only a very small area of the SAC is located just within the District boundary in the west. The tiny fragment of the SAC that extends within the District boundary is located outside of any towns or villages where development is proposed, and so could only be affected in terms of habitat loss/damage by the small-scale development that could potentially come forward anywhere in the District, i.e. that associated with policies DS3, H3, H4, H5, H7, EC3, EC5, EC10, EC11 and INF2. It is unlikely that such development would come forward in the location of the SAC, as the fragment that lies within the District boundary is outside of any villages. | EN7: Biodiversity and Geodiversity: Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them ("that would adversely affect their integrity" in the proposed Focussed Change; proposed Policy EN9). | Yes: Given the very small area of the SAC that lies within the District and its peripheral location outside of any town and villages, and the protection that the Local Plan provides for, it is considered highly unlikely that the integrity of the SAC would be affected by the loss of or damage to habitat. |
| Cotswold Beechwoods | As above. | Air pollution from increased vehicle traffic | The SAC is within 200m of the A46 and the qualifying beech forests and semi-natural dry grassland habitats are potentially vulnerable to | Measures within the Local Plan seeking to encourage the use of | Yes: Although the qualifying beech forests and semi- |

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|---|---|--|--|--|
| | | | <p>increased air pollution. Natural England's Site Improvement Plan for the SAC³⁶ identifies air pollution (specifically nitrogen deposition) as a key threat currently facing the SAC and APIS data for the SAC shows that levels of nitrogen deposition are already exceeding critical loads.</p> <p>However, the stretch of the A46 within 200m of the SAC is a key route between Cheltenham and Stroud, both of which (as well as this stretch of the A46) lie outside of Cotswold District. The stretch of the A46 in proximity of the SAC doesn't provide a link to or from any of the key development locations within Cotswold District. Therefore, this stretch of road is not considered likely to see significant increases in traffic from the development in the Local Plan.</p> | sustainable transport (in particular policy INF3: Sustainable Transport) should provide some mitigation for the impacts of increased vehicle traffic. | natural dry grassland habitat are potentially vulnerable to increased air pollution it is not considered likely that increases in traffic along this stretch of the A46 as a result of the Local Plan will be significant. |
| Cotswold Beechwoods | As above. | Erosion/trampling or general disturbance from increased recreation pressure | <p>The Cotswold Beechwoods SAC is publicly accessible and known to be used for tourism and recreation. Increases in the population of Cotswold District could therefore result in additional pressure on the site from visitors. In an earlier consultation response, Natural England recognised the potential risks of increased recreation pressure on the SAC.</p> <p>However, as the SAC is on the western edge of</p> | Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at sensitive European | Yes: Given the distance of much of the housing proposed from the SAC, and the mitigation identified, the Local Plan is not considered likely to have significant effects on Cotswold |

³⁶ Natural England (November 2014) Improvement Programme for England's Natura 2000 Sites (IPENS) Planning for the Future: Site Improvement Plan – Cotswold Beechwoods

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|---|---|---|---|---|
| | | | <p>the District, most of the towns and villages where housing development is proposed in the Local Plan are located at least several kilometres from the SAC, indicating that they may be unlikely to make use of the site for day-to-day activities such as dog walking.</p> | <p>sites, and a number of the policies relating to specific towns and villages include similar provisions. The supporting text to this policy recognises the potential for the Local Plan to have recreational impacts on Cotswold Beechwoods SAC and refers to a commitment for Cotswold District Council to work with key stakeholders including Natural England to develop appropriate mitigation.</p> | <p>Beechwoods SAC as a result of increased recreation pressure.</p> |
| Bredon Hill | Violet click-beetle <i>Limoniscus violaceus</i> | Erosion/trampling or general disturbance from increased recreation pressure | <p>Bredon Hill SAC is publicly accessible and known to be used for tourism and recreation. Increases in the population of Cotswold District could therefore result in additional pressure on the site from visitors.</p> <p>However, as the SAC is well outside of the District, approximately 12km from the western boundary at the nearest point, the towns and</p> | Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at | <p>Yes: Given the distance of the SAC from the District and the mitigation identified, the Local Plan is not considered likely to have significant effects on Bredon</p> |

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
|-------------------------------------|--|---|--|--|---|
| | | | villages where housing development is proposed in the Local Plan are located a long way from the SAC, indicating that they may be unlikely to make use of the site for day-to-day activities such as dog walking. | sensitive European sites, and a number of the policies relating to specific towns and villages include similar provisions. | Hill SAC as a result of increased recreation pressure. |
| Dixton Wood | Violet click-beetle <i>Limonicus violaceus</i> | Erosion/trampling or general disturbance from increased recreation pressure | <p>Dixton Wood SAC is publicly accessible and known to be used for tourism and recreation. Increases in the population of Cotswold District could therefore result in additional pressure on the site from visitors.</p> <p>However, as the SAC is well outside of the district, approximately 7.5km from the north western boundary at the nearest point, the towns and villages where housing development is proposed in the Local Plan are located a long way from the SAC, indicating that they may be unlikely to make use of the site for day-to-day activities such as dog walking.</p> | Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at sensitive European sites, and a number of the policies relating to specific towns and villages include similar provisions.at European sites. | Yes: Given the distance of the SAC from the District and the mitigation identified, the Local Plan is not considered likely to have significant effects on Bredon Hill SAC as a result of increased recreation pressure. |
| Rodborough Common | Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) | Air pollution from increased vehicle traffic | The SAC is within 200m of the A46 on the southern side of Stroud and the qualifying semi-natural dry grassland habitat is potentially vulnerable to increased air pollution. Natural England's Site Improvement Plan for the SAC ³⁷ identifies air pollution (specifically nitrogen | Measures within the Local Plan seeking to encourage the use of sustainable transport (in particular policy INF3: Sustainable | Yes: Although the qualifying semi-natural dry grassland habitat is potentially vulnerable to |

³⁷ Natural England (November 2014) Improvement Programme for England's Natura 2000 Sites (IPENS) Planning for the Future: Site Improvement Plan – Rodborough Common

| European site likely to be affected | European site details and qualifying features | Potential impact identified at Screening stage and Local Plan proposal(s) that may have an effect | Is an adverse effect on site integrity likely? | Mitigation already in Local Plan, and recommendations for mitigating effects within the Local Plan or further work for the HRA | If the mitigation measures and recommendations are implemented would it be possible that there would be no adverse effect on site integrity? |
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| | | | <p>deposition) as a key threat currently facing the SAC and APIS data for the SAC shows that levels of nitrogen deposition are already exceeding critical loads.</p> <p>However, that stretch of road runs south from Stroud, down towards the M4, and is almost entirely outside of Cotswold District, only crossing the south western part of the District. Although Stroud is one of the main areas to which residents of Cotswold District commute, the stretch of the A46 within 200m of the SAC does not connect Stroud with any of the main development locations within Cotswold District. Instead, a direct link between Cotswold District and Stroud is provided by the A419 towards Cirencester and commuter traffic from Cotswold District is considered much more likely to use that route. The A419 is more than 200m to the east of Rodborough Common SAC and is on the leeward side of the prevailing westerly winds, so increases in traffic along that route are not expected to affect the SAC in relation to increased air pollution.</p> | <p>Transport) should provide some mitigation for the impacts of increased vehicle traffic.</p> | <p>increased air pollution it is not considered likely that increases in traffic along this stretch of the A46 as a result of the Local Plan will be significant.</p> |
| Rodborough Common | As above. | Erosion/trampling or general disturbance from increased recreation pressure | <p>Rodborough Common SAC is publicly accessible and known to be used for tourism and recreation. Increases in the population of Cotswold District could therefore result in additional pressure on the site from visitors, particularly as recreation is already causing local</p> | <p>Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as</p> | <p>Yes: Given the distance of the SAC from the District and the mitigation identified, the Local Plan is not</p> |

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| | | | <p>erosion.</p> <p>However, as the SAC is outside of the District, approximately 4km from the south western boundary at the nearest point, the towns and villages where housing development is proposed in the Local Plan are located at least several km from the SAC, indicating that they may be unlikely to make use of the site for day-to-day activities such as dog walking. This is particularly likely in light of the 'core recreational catchment' of 4km that was identified by Stroud District Council and referred to by Natural England in an earlier consultation response.</p> | <p>open spaces which should help to relieve recreation pressure at sensitive European sites, and a number of the policies relating to specific towns and villages include similar provisions.</p> | <p>considered likely to have significant effects on Rodborough Common SAC as a result of increased recreation pressure.</p> |
| Severn Estuary | <p>Estuaries. Mudflats and sandflats not covered by seawater at low tide. Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>). Sandbanks which are slightly covered by sea water all the time. Reefs. Sea lamprey</p> | <p>Erosion/trampling or general disturbance from increased recreation pressure</p> | <p>The Severn Estuary is known to be vulnerable to tourism based activities and disturbance. However, the SAC is located approximately 10km from the western edge of the District and significantly further from the main population centres which are further to the east within the District. Therefore, it is unlikely to see a significant increase in day-to-day visitors as a result of development within Cotswold District.</p> | <p>Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory measures) will be safeguarded from development that</p> | <p>Yes: Given the distance of the SAC from the District and the mitigation identified, the Local Plan is not considered likely to have significant effects on Severn Estuary SAC as a result of increased recreation pressure.</p> |

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| | River lamprey Twaite Shad | | | could adversely affect them. Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at sensitive European sites, and a number of the policies relating to specific towns and villages include similar provisions. | |
| Severn Estuary | Bewick's swan Gadwall Greater white-fronted goose Dunlin Shelduck Redshank Waterfowl | Erosion/trampling or general disturbance from increased recreation pressure | The Severn Estuary is known to be vulnerable to tourism based activities and disturbance, which could affect the qualifying bird species of the SPA. However, the SPA is located approximately 10km from the western edge of the District and significantly further from the main population centres which are further to the east within the District. Therefore, it is unlikely to see a significant increase in day-to-day visitors as a result of development within Cotswold District. | Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including proposed sites and sites acquired for compensatory | Yes: Given the distance of the SPA from the District and the mitigation identified, the Local Plan is not considered likely to have significant effects on Severn Estuary SPA as a result of increased recreation pressure. |

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| | | | | <p>measures) will be safeguarded from development that could adversely affect them.</p> <p>Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at sensitive European sites, and a number of the policies relating to specific towns and villages include similar provisions.</p> | |
| Severn Estuary | <p>Criterion 1: Due to immense tidal range and the following habitats: Sandbanks which are slightly covered by sea water all the time. Estuaries.</p> | Erosion/trampling or general disturbance from increased recreation pressure | <p>The Severn Estuary is known to be vulnerable to tourism based activities and disturbance. However, the Ramsar site is located approximately 10km from the western edge of the District and significantly further from the main population centres which are further to the east within the District. Therefore, it is unlikely to see a significant increase in day-to-day visitors as a result of development within</p> | <p>Policy EN7 (EN9 in the Focussed Changes): Biodiversity and Geodiversity – Designated Sites states that internationally designated wildlife sites (including</p> | <p>Yes: Given the distance of the Ramsar site from the District and the mitigation identified, the Local Plan is not considered likely to have significant effects on Severn</p> |

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| | <p>Mudflats and sandflats not covered by seawater at low tide.</p> <p>Atlantic Sea Meadow (<i>Glauco-Puccinellietalia maritima</i>).</p> <p>Criterion 3: Unusual estuarine communities, reduced diversity and high productivity.</p> <p>Criterion 4: This site is important for the run of migratory fish between sea and river via estuary. Species include Atlantic Salmon <i>Salmo salar</i>, sea trout <i>S. trutta</i>, sea lamprey <i>Petromyzon marinus</i>, river lamprey <i>Lampetra fluviatilis</i>, allis shad <i>Alosa alosa</i>, twaite shad <i>A. fallax</i> and eel <i>Anguilla Anguilla</i>. It is also of particular importance for</p> | | Cotswold District. | <p>proposed sites and sites acquired for compensatory measures) will be safeguarded from development that could adversely affect them.</p> <p>Policy INF7: Green Infrastructure promotes the protection and enhancement of green infrastructure such as open spaces which should help to relieve recreation pressure at sensitive European sites, and a number of the policies relating to specific towns and villages include similar provisions.</p> | Estuary Ramsar site as a result of increased recreation pressure. |

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| | <p>migratory birds during spring and autumn.</p> <p>Criterion 5: Internationally important assemblage of waterfowl (70,919)</p> <p>Criterion 6: Internationally important wintering populations of the following bird species:</p> <p>Bewick's swan <i>Cygnus columbianus bewickii</i></p> <p>Greater white-fronted goose <i>Anser albifrons albifrons</i></p> <p>Common shelduck <i>Tadorna tadorna</i></p> <p>Dunlin <i>Calidris alpina alpina</i></p> <p>Common redshank <i>Tringa tetanus tetanus</i></p> <p>Criterion 8: More than 110 species of fish recorded, one of the most diverse</p> | | | | |

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| | systems in the UK. Significant migration route and spawning/nursery ground. | | | | |

