

Integrated Impact Assessment (IIA) for the Cotswold District Local Plan 2026-2043

IIA Report Non-Technical Summary to accompany Regulation 19 consultation on the Cotswold District Local Plan 2026-2043

Cotswold District Council

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Quality information

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Front cover: Bibury Cottages in the Cotswolds (cropped)

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1. Introduction

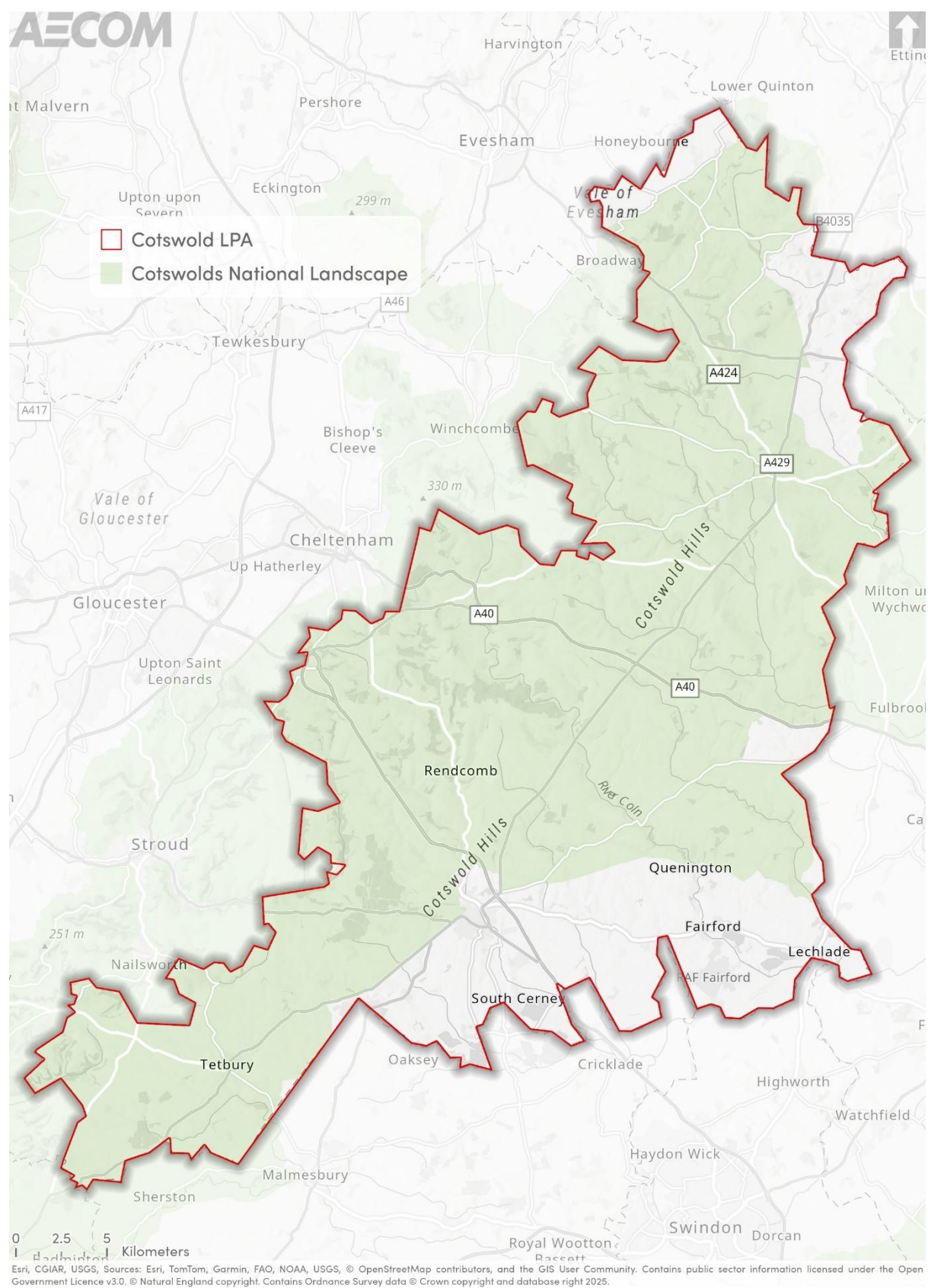
1.1. Background

- 1.1.1 AECOM is commissioned to undertake an Integrated Impact Assessment (IIA), incorporating Strategic Environmental Assessment / Sustainability Appraisal, Health Impact Assessment, and Equalities Impact Assessment, in support of the emerging Cotswold District Local Plan 2026-2043 ("the Plan"), which is being prepared by Cotswold District Council (CDC).
- 1.1.2 This IIA Report is the latest document to be produced as part of the IIA process and accompanies the Regulation 19 consultation for the Plan, undertaken for a period of six weeks between **24th August 2026** and **5th October 2026**. The IIA Report answers the following three questions to meet regulatory requirements, structured into three 'Parts':
- **Part 1:** What has plan making / IIA involved up to this stage?
 - **Part 2:** What are the appraisal findings at this stage?
 - **Part 3:** What are the next steps?
- 1.1.3 Once adopted, the Plan will set the strategy for growth and change for the district up to 2043, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.4 The area covered by the Plan is shown in **Figure 1-1** and encompasses the whole of the Cotswold District.

1.2. IIA explained

- 1.2.1 IIA fulfils the requirements for Sustainability Appraisal (SA) and discharges the duties for Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).
- 1.2.2 **IIA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues.** The aim of IIA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the IIA for the Plan seeks to maximise its contribution to sustainable development and the quality of life of residents.
- 1.2.3 The approach is to fully integrate these components and issues to provide a single assessment process to inform the development of the Plan.

Figure 1-1: Cotswold District



1.3. IIA process

- 1.3.1 The IIA process to support the Plan is undertaken in five stages. This IIA Report is concerned with **Stage 3**.

Stage 1: Scoping Report

- Establish the context and baseline for the IIA.
- Identify key sustainability issues for the Plan.
- Develop the IIA Framework of objectives and appraisal questions.

Stage 2: Interim IIA Report(s)

- Develop and refine alternatives (i.e., growth 'scenarios') for the Plan.
- Appraise the growth scenarios and identify likely significant environmental effects.
- Prepare Interim IIA Report(s) to accompany Regulation 18 consultation(s) on the Plan.

Stage 3: Consult on the Plan and IIA Report

- Appraise the policies and proposals within the draft Plan.
- Prepare the IIA Report to accompany Regulation 19 version of the Plan.
- Consult on the Plan.

Stage 4: IIA Report Addendum

- Submission and examination of the Plan.
- Appraisal of modifications.

Stage 5: IIA Adoption Statement

- Prepare the IIA Adoption Statement.
- Monitor the significant effects of the Plan.

1.4. This IIA Report

- 1.4.1 The Plan is currently published under Regulation 19 of the Local Planning Regulations, such that representations can be made ahead of the plan being submitted to the Government and subjected to an Examination in Public (EiP) overseen by the Planning Inspectorate. As such, this document (i.e., the Non-Technical Summary) comprises part of the formally required IIA Report. It is published alongside the Plan (and the full Regulation 19 IIA Report) in order to inform representations and subsequent plan finalisation as part of the EiP.

2. The Local Plan scope

2.1. The plan area

- 2.1.1 Cotswold District (see **Figure 1-1**) is located in the eastern part of Gloucestershire and covers a predominantly rural area characterised by villages, historic market towns and open countryside. **Around 80% of the district lies within the Cotswolds National Landscape**, which is a nationally designated landscape of significant environmental and scenic value. This has a strong influence on settlement patterns, landscape character, environmental protection and the capacity for new development.
- 2.1.2 The district shares boundaries with the Gloucestershire authorities of Cheltenham, Gloucester, Forest of Dean, Stroud and Tewkesbury, as well as West Oxfordshire, South Oxfordshire, Cherwell, Stratford on Avon, and Wychavon Districts, and the unitary authorities of Swindon and Wiltshire. These neighbouring areas share several strategic planning matters with Cotswold District, including housing provision, transport connectivity, economic development, environmental assets and the protection of landscape character.
- 2.1.3 **Principal and Non-Principal Settlements are defined as the most sustainable locations within the district for delivering growth and are the top two tiers within the settlement hierarchy for the Local Plan.** Cirencester is classified as the district's 'main settlement' and is the largest town. Moreton-in-Marsh and Kemble are the only locations in the district (both Principal Settlements) with access to a train station. Honeybourne Station is approximately 4km to the west of Mickleton.
- 2.1.4 **Ongoing discussions regarding Local Government Reorganisation in Gloucestershire may have implications for the governance and strategic planning context of the district in the medium to long term.** The Ministry of Housing, Communities and Local Government (MHCLG) is currently consulting on a number of proposals for unitary local government structures across Gloucestershire, which could result in changes to administrative boundaries, service delivery arrangements and strategic planning responsibilities affecting Cotswold district.

2.2. The plan period

- 2.2.1 **The plan period covers a 17-year period from 2026-2043**, in light of NPPF paragraph 22 which states: *"Local plans] should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead..."*

2.3. Plan vision and objectives

- 2.3.1 The plan includes a spatial vision and set of six strategic objectives to help guide development during the plan period. The spatial vision is as follows:

“By 2043, Cotswold District will be a resilient, inclusive, and forward-looking rural district that has responded to the climate crisis and ecological emergency, conserved and enhanced the Cotswolds National Landscape, delivered sustainable communities, and enabled a vibrant, low-carbon economy. Development will have been guided by a Spatial Strategy that prioritises environmental stewardship, social equity, and economic vitality, while respecting the district’s unique landscape, heritage, and character. The roles of the district’s settlements will be reinforced, with Cirencester continuing to function as the principal centre, supported by a network of market towns and villages that serve their rural hinterlands.

“The Local Plan will have delivered a diverse range of housing, including a significant increase in socially rented and smaller and more affordable homes, enabling residents of all ages and backgrounds to live securely and sustainably. This will include homes that respond to the needs of an ageing population, support younger people and key workers to remain in the district, and provide a mix of sizes and tenures that improve affordability and maintain a balanced community. New development sites will have matured into thriving communities, offering high-quality homes, employment opportunities, and essential services, all supported by integrated infrastructure and sustainable transport networks.

“The district will have transitioned to zero-carbon development, with new buildings and infrastructure designed to minimise energy and water use and maximise renewable energy generation. Biodiversity Net Gain will be embedded across all larger development, contributing to a richer natural environment and improved ecological resilience. Water resources will be carefully managed, with development responding to water stress, flood risk and the need to protect and enhance water quality.

“The Local Plan will have helped to reduce transport emissions through investment in active travel infrastructure, public transport, and strategic growth focused around transport nodes and ensuring local services and facilities are close enough to access by walking, wheeling or cycling, and/ or other sustainable transport modes. Communities will be healthier, more connected, and better supported by local services, green spaces, and digital infrastructure.

“Cotswold District will continue to be ‘Green to the Core’, with planning decisions consistently reflecting the long-term interests of people, place, and planet.”

3. The IIA scope

- 3.1.1 The scope of the IIA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan, i.e. when reaching conclusions on 'likely significant effects'.
- 3.1.2 The SEA Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. These authorities were consulted on the scope of the IIA in late 2020. The responses (along with comments on how these have been considered and addressed) have informed the IIA process and are presented in **Appendix B** in the main body of the IIA Report.
- 3.1.3 In the time since scoping consultation was undertaken, it is acknowledged that the planning policy context and baseline has evolved, with this information a useful source of evidence for the IIA. In recognition of this, the planning policy context and baseline information initially included in the Scoping Report has been reviewed and updated (where appropriate) to inform the IIA, and is also presented in **Appendix B**.
- 3.1.4 Drawing on the review of the sustainability context and baseline, the IIA Scoping stage identified a range of key sustainability issues that should be a particular focus of IIA (see **Appendix C** in the main body of the IIA Report), ensuring it remains targeted on the most important issues. These issues were then translated into an IIA 'Framework' (see **Table 3-1** below).
- 3.1.5 **The IIA Framework provides a way in which the likely significant effects and sustainability implications of the Plan and alternatives can be identified and subsequently analysed based on a structured and consistent approach.** The IIA Framework and the appraisal findings in this IIA Report have been presented under twelve IIA themes, reflecting the range of information being considered through the IIA process.
- 3.1.6 The selected IIA themes incorporate the 'topics' suggested by Schedule 2(6) of the Environmental Assessment of Plans and Programmes Regulations. These were refined to reflect a broad understanding of the anticipated scope of plan effects. An 'Equalities' theme and 'Healthy and Vital Communities' theme were incorporated into the IIA Framework to integrate equalities and health considerations into the IIA process, to discharge the duties for EqIA and HIA.

Table 3-1: The IIA Framework of topics and objectives

Topic	Objectives
 Biodiversity	• Protect and enhance biodiversity.
 Climate Change (adaptation)	• Ensure adaptability to climate change that, where feasible, goes beyond simple limitation of negative effects.
 Climate Change (mitigation)	• Take an active role in achieving net zero carbon by 2050 if not before.
 Economy and Employment	• Achieve sustainable economic growth and opportunities for employment, including support for the rural economy. Support the resilience and vitality of town centres during transformation from the “traditional” retail-dominated high street to a more flexible and responsive model. • Encourage and support the development of sustainable tourism.
 Equalities	• Advance equality for all.
 Green Infrastructure and Natural Capital	• Conserve and enhance green infrastructure assets and networks and exploit its multi-functional benefits. • Deliver natural capital and enhance the provision of ecosystem services.
 Healthy and Vital Communities	• Contribute to the achievement of balanced and healthy communities and be responsive to the needs of different age groups in the district.

Topic	Objectives
 Historic Environment	• Deliver high quality and well-designed sustainable development that responds appropriately to its context. • Conserve and enhance the historic environment of the district.
 Housing	• Meet local need for housing by maintaining a sustainable level of supply and ensure that new housing is as sustainable as possible in terms of its location, construction materials and internal and external facilities.
 Landscape	• Conserve, restore and enhance the character of landscapes in the district.
 Land, Soil and Water Resources	• Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. • Support the efficient use of land. • Encourage the prudent use of natural resources. • Protect and enhance water quality and minimise water use.
 Transport and Air Quality	• Reduce the need to travel by private car, reduce traffic congestion and air pollution through improving travel choice by active encouragement of modal shift and facilitation of more sustainable forms of transport.

4. Part 1: What has plan making / IIA involved up to this stage?

4.1. IIA work to date

4.1.1 In line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then considered the appraisal findings when finalising the Local Plan. **Part 1** of the IIA Report is given over to:

- Presenting the reasons for selecting the alternatives dealt with (summarised under the heading ‘defining reasonable alternatives’ below, with full details provided in **Chapter 5** of the IIA Report).
- Presenting a summary of the appraisal of the alternatives (summarised under the ‘appraising growth scenarios’ heading below, with detailed appraisal findings provided in **Chapter 6** of the IIA Report); and
- Explaining the Council’s reasons for selecting the preferred approach (summarised under the ‘developing the preferred approach’ heading below, with further detail provided in **Chapter 7** in the IIA Report)

4.1.2 Importantly, this work builds upon existing IIA work undertaken at the Issues and Options stages (February 2022 and February 2024) and the Regulation 18 ‘Preferred Options Plan’ stage reported in the Interim IIA Report (November 2025).

4.2. Current stage of plan making

4.2.1 The Council have received correspondence from MHCLG confirming that they expect the district to meet their local housing need (LHN) and employment land requirements during the plan period, and plan making has since evolved to reflect this context.

4.2.2 In light of this, the growth scenarios tested in the Interim IIA Report accompanying the Preferred Options (Regulation 18) consultation in November 2025 have been revisited and updated to consider reasonable alternative ‘growth scenarios’ for meeting LHN and employment land requirements across the district at this stage of plan making.

4.3. Defining reasonable alternatives

4.3.1 In order to provide for objectively assessed needs alongside delivering-on wider plan objectives, the broad spatial strategy for the Cotswold District Local Plan 2026-2043 is to focus major development outside of the Cotswolds National Landscape and at Principal Settlements (more focus) and Non-Principal Settlements (less focus), whilst also supporting

opportunities to deliver mixed-use growth across sustainable urban extensions (minimum of 350 homes) or new settlements (minimum of 1,500 homes). The broad spatial strategy was established after considering the findings within the Interim IIA Report (see **Scenario 5**) and the responses to the Preferred Options (Regulation 18) consultation in November 2025.

- 4.3.2 In light of the above, the IIA has revisited and updated the growth scenarios considered at the Preferred Options (Regulation 18) consultation to consider the key alternatives that exist at this current stage of plan making. This includes the consideration of the alternative approaches (i.e., key variable site options) for plan makers tasked with selecting the preferred approach for delivering the broad spatial strategy for the Plan.
- 4.3.3 The growth scenarios have been defined by considering a range of strategic (top-down) factors and locally specific (bottom-up) factors. These are summarised below and detailed in **Chapter 5** of the IIA Report.

Top-down (strategic) factors

Housing context

- 4.3.4 For Cotswold District, the revised standard method identifies a housing need of 1,054 dwellings per annum (dpa), which represents an increase of over 100% from the number which the Council was originally planning for (493 dpa) through the initial stages of plan making and Regulation 18 consultations to date. As a result, **the local housing need (LHN) for the 17-year plan period is 17,918 homes.**
- 4.3.5 It is important to be clear that providing for established needs, as far as is consistent with sustainable development, is a key aspect of local plan-making. As part of this, there is a need to plan for LHN provided by the NPPF and then identify a supply of land sufficient to deliver on the committed housing requirement.

Employment context

- 4.3.6 The Employment Land Review (ELR) 2026 outlines an overall need of 68.5h of employment land during the plan period. In order to meet this requirement, a further 32.7 ha is needed beyond known completions and commitments. **Employment land will be delivered for a mix of office, research and development, and industrial uses.**
- 4.3.7 The approach to meeting employment land requirements during the plan period focuses on safeguarding and expanding employment provision on existing sites and delivering mixed-use development across strategic site allocations. The integration of employment uses within strategic residential-led developments helps to create more self-contained communities, reduce the need to travel and maximise opportunities for active travel and public transport use.

Settlement role and function

- 4.3.8 In light of the increased LHN for the district, the Council have reconsidered (in broad terms) where is more/less suited to accommodating growth by revisiting their settlement hierarchy. The refresh of the Council's Settlement Role and Function Study has considered the sustainability of the district's 49 largest settlements delivering growth, and whether the existing hierarchy remains 'fit for purpose'. The Study primarily focuses on the size of settlements, the employment role of settlements, and the community facilities and services they provide.
- 4.3.9 As discussed, Principal and Non-Principal Settlements are defined as the most sustainable locations within the district for delivering growth and are the top two tiers within the settlement hierarchy for the Local Plan.
- 4.3.10 **A total of 16 locations are defined as a Principal Settlement:**
- Andoversford
 - Bourton-on-the-Water
 - Cirencester
 - Kemble
 - Mickleton
 - Northleach
 - South Cerney
 - Tetbury
 - Blockley
 - Chipping Campden
 - Fairford
 - Lechlade
 - Moreton-in-Marsh
 - Siddington
 - Stow-on-the-Wold
 - Upper Rissington
- 4.3.11 **A total of 18 locations have been defined as Non-Principal Settlements (including Village Clusters):**
- Avening
 - Bledington
 - Broadwell
 - Didmarton
 - Kempsford
 - Meysey Hampton
 - Poulton
 - Sapperton
 - Willersey
 - Bibury
 - Bourton-on-the-Hill
 - Chedworth
 - Down Ampney
 - Longborough
 - North Cerney
 - Preston
 - Swell
 - The village cluster of Coln St Aldwyns, Hatherop, and Quenington

Bottom-up factors

Site Selection Topic Paper

- 4.3.12 A total of 891 sites have been submitted to the Council as potential land for development, with further assessment required to confirm their suitability and deliverability. All submitted sites have gone through the Council's site

assessment and selection process, which applies a series of stages to progressively identify which sites should be rejected and which sites could potentially be recommended for a Local Plan allocation.

4.3.13 A comprehensive overview of the stages and the assessment findings can be found within the Site Selection Topic Paper published alongside the Regulation 19 Cotswold District Local Plan 2026-2043. A summary of the process is described below:

- **Stage 1:** Identification and initial assessment of sites through the HELAA. The HELAA provides a 'long-list' of sites which have potential to demonstrate suitability, availability and achievability for more detailed consideration from Stage 2 onwards.
- **Stage 2:** An initial sift of sites which discounts sites based on a set of criteria informed by national policy and guidance (i.e., NPPF and Footnote 7 constraints) and the broad spatial strategy for the emerging Local Plan.
- **Stage 3:** Detailed but proportionate assessment of the constraints and opportunities for the sites taken forward for Stage 3, based on the available technical evidence base. Reflecting the assessment findings, sites are classified into one of three categories with respect to their potential suitability for a Local Plan allocation, as follows:
 - clear preferred site option (++);
 - marginal omission site option (-); or
 - clear omission site option (- -).

4.3.14 The detailed assessment findings for the strategic site options, non-strategic site options, and employment site options taken forward to Stage 3 of the process is presented in the Site Selection Topic Paper, with accompanying tables and maps showing the overall ratings and their location within the district. A summary of the findings is presented in **Appendix D** in the main body of the IIA Report.

Strategic Growth Opportunities

4.3.15 The supply of large numbers of new homes and employment land can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. This is provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

4.3.16 In recognition of the significant constraint to delivering major development within the Cotswolds National Landscape, the Council has considered the potential constraints and opportunities for delivering strategic-scale growth outside of the Cotswolds National Landscape. **This could be achieved through sustainable urban extensions to existing settlements (for a**

minimum of 350 homes), or through the creation of new settlements (for a minimum of 1,500 homes) recognising that developments of this size are generally capable of supporting the infrastructure, services, facilities, employment opportunities and stewardship arrangements necessary to create sustainable communities.

Arriving at the revised growth scenarios

- 4.3.17 The ‘top-down’ and ‘bottom-up’ factors discussed above require the IIA to revisit and refine the growth scenarios which have been considered to date. Sites which were categorised as either a ‘clear preferred site option’ or ‘marginal omission site option’ through the Site Selection Topic Paper have informed the revised growth scenarios considered through this Regulation 19 IIA Report.
- 4.3.18 The scenarios have been revised and updated in the context of the Council’s objective to meet LHN and employment land requirements over the 17-year plan period between 2026-2043, whilst also aligning with the broad spatial strategy which was established during the earlier stages of plan making. As a reminder, the broad spatial strategy for the Cotswold District Local Plan 2026-2043 is to focus major development outside of the Cotswolds National Landscape and at Principal Settlements (more focus) and Non-Principal Settlements (less focus), whilst also supporting opportunities for strategic growth across sustainable urban extensions (minimum of 350 homes) or new settlements (minimum of 1,500 homes).
- 4.3.19 **All scenarios incorporate a consistent set of constants** in relation to the distribution of growth across the district. These elements form the baseline position across all of the revised growth scenarios and comprise:
- **Known commitments:** reflecting the commitments up to 1st April 2026.
 - **Saved allocations:** those which are rolled forward from the adopted Local Plan but have not yet been built-out (or partially built-out).
 - **Windfalls:** no windfall figure for the first three years of the plan period, with the total calculated based on a 14-year period with a conservative estimate of the total applied.
 - **Constant strategic allocations:** incorporating seven sustainable urban extensions adjoining Principal and Non-Principal Settlements, and one new settlement to the south of Driffield. All of the sites are identified as ‘clear preferred’ site options within the Site Selection Topic Paper. The sites have been comprehensively master planned with accompanying site development frameworks included in the Local Plan, reflecting engagement with site promoters, key stakeholders, and consideration of Regulation 18 consultation responses. An overview of the key elements of the strategic allocations is provided below.
 - Cirencester - land to the south of the Steadings

- Cirencester - land to the east of Kingshill Lane
 - Down Ampney - land to the north, east, and south of Down Ampney
 - Driffield - new settlement to the south of Driffield
 - Kemble - land to the south west of Kemble
 - Preston - land to the south of Preston
 - Siddington - land to the south-west of Siddington; and
 - Fairford - land to the north east of Fairford
- **Non-strategic allocations:** incorporating sites within or adjoining Principal and Non-Principal Settlements across the district. In light of the LHN for the district and given that a significant supply of new homes will be brought forward via strategic sites which have longer lead-in times, all of the 'clear preferred site options' for non-strategic growth are proposed as Local Plan allocations and have therefore been applied as constants across the revised scenarios.
- 4.3.20 In the context of the above, seven growth scenarios have been assessed through the IIA to inform the Council's preferred approach at this stage of plan making. **The variable strategic site options across the scenarios focus on the key choices at three locations:**
- Ampney Crucis
 - Mickleton; and
 - Moreton-in-Marsh
- 4.3.21 It is acknowledged that theoretically there are several potential combinations which could be applied to the scenarios. The combinations which have been tested seek to avoid an under-delivery or over-delivery of homes, i.e., from applying lower growth or higher growth across all of the variable site options, whilst also reflecting the key choices for plan makers tasked with selecting the preferred approach for the Local Plan at this Regulation 19 stage of plan making. The scenarios are as follows:
- **Scenario 1:** Higher growth at Moreton-in-Marsh; higher growth at Mickleton; no growth at Ampney Crucis. The total housing supply through Scenario 1 is **20,112 homes**, providing an approximate 12.2% headroom above LHN.
 - **Scenario 2:** Medium-high growth at Moreton-in-Marsh; higher growth at Mickleton; no growth at Ampney Crucis. The total housing supply through Scenario 2 is **18,812 homes**, providing an approximate 5.0% headroom above LHN.
 - **Scenario 3:** Medium growth at Moreton-in-Marsh; higher growth at Mickleton; higher growth at Ampney Crucis. The total housing supply through Scenario 3 is **19,095 homes**, providing an approximate 6.6% headroom above LHN.

- **Scenario 4:** Medium growth at Moreton-in-Marsh; higher growth at Mickleton; lower growth at Ampney Crucis. The total housing supply through Scenario 4 is **18,929 homes**, providing an approximate 5.6% headroom above LHN.
- **Scenario 5:** Medium growth at Moreton-in-Marsh; lower growth at Mickleton; higher growth at Ampney Crucis. The total housing supply through Scenario 5 is **18,588 homes**, providing an approximate 3.7% headroom above LHN.
- **Scenario 6:** Medium growth at Moreton-in-Marsh; lower growth at Mickleton; lower growth at Ampney Crucis. The total housing supply through Scenario 6 is **18,422 homes**, providing an approximate 2.8% headroom above LHN; and
- **Scenario 7:** Lower growth at Moreton-in-Marsh; higher growth at Mickleton; lower growth at Ampney Crucis. The total housing supply through Scenario 7 is **18,462 homes**, providing an approximate 3.0% headroom above LHN.

4.3.22 The housing supply for the component parts and variables for each growth scenario is presented in **Table 5-1** in the main body of the IIA Report. These are correct as of July 2026, although it is recognised that the numbers for the 'known commitments' and 'non-strategic allocations' may be revised over the coming months given that there are site options with live planning applications. Updated housing completions for the 2026 to 2027 year may be available around May 2027, before adoption.

4.4. Appraising growth scenarios

- 4.4.1 The seven growth scenarios have been appraised. For each scenario, the appraisal identifies / evaluates 'likely significant effects' on the baseline, drawing on the IIA themes / objectives identified through scoping as a methodological Framework (see **Appendix C** in the IIA Report).
- 4.4.2 For each IIA theme, a commentary on the likely effects is presented, including significant effects. These range from major positive (++) / minor positive (+) to major negative (--) / minor negative (-) (see **Table 4-1**). Where both positive and negative effects are anticipated, mixed effects (+/-) are noted. Where no significant effects are anticipated neutral / no effects (0) are noted. Finally, where it is not possible to conclude on significance at this stage, uncertain effects (?) are noted. Scenarios are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '6' the least favourable ranking.

Table 4-1: Significance key

Major negative --	Minor negative -	Minor positive +	Major positive ++	Mixed effects +/-	Neutral effect 0
(significant adverse effect)	(adverse effect of limited or uncertain significance)	(beneficial effect of limited or uncertain significance)	(significant beneficial effect)	(a combination of beneficial and adverse effects)	

- 4.4.3 The full appraisal findings are discussed in detail within **Chapter 6** of the IIA Report, including a detailed overview of the relative sustainability merits of each scenario presented as a commentary of effects for each IIA theme. A summary of the appraisal findings is presented below,
- 4.4.4 **The appraisal identifies that all scenarios are likely to result in a combination of positive, mixed and negative effects across the IIA topics.** This reflects the inherent trade-offs associated with accommodating growth, particularly in a district characterised by a high-quality environmental baseline and a dispersed settlement pattern. While all scenarios meet LHN and employment land requirements and provide opportunities for economic growth, they differ in how effectively they balance environmental, social and economic objectives.
- 4.4.5 Significant positive effects are identified across several scenarios, although the drivers of these effects vary. Higher growth scenarios, particularly **Scenario 1** performs particularly strongly in relation to economic development and climate change mitigation through the concentration of growth at Moreton-in-Marsh, the district's most accessible settlement, and the delivery of a full link road which supports strategic infrastructure provision. **Scenario 2** also performs strongly across a range of topics, including housing, transport and air quality, and the historic environment, reflecting a more balanced level of growth at Moreton-in-Marsh with a south-eastern link road, whilst similarly avoiding growth at Ampney Crucis. **Scenarios 3, 4 and 5** also perform positively in several topics through their contribution to housing delivery, economic growth and the delivery of strategic infrastructure, including the south-eastern link road at Moreton-in-Marsh.
- 4.4.6 However, these positive effects are accompanied by trade-offs, particularly in relation to environmental topics. Scenarios which include higher levels of development at the smaller settlements (Mickleton and Ampney Crucis), introduce greater potential for adverse effects on biodiversity, landscape character, the historic environment and natural capital. This reflects both the sensitivity of these locations and the scale of development relative to the size and function of the settlements. These scenarios are also more

likely to result in increased reliance on private vehicles, contributing to higher transport-related emissions.

- 4.4.7 Scenarios that reduce development at Mickleton and Ampney Crucis (particularly **Scenarios 1, 2, and 6**) perform more favourably in environmental terms by limiting impacts on sensitive receptors and reducing pressure on smaller settlements. This approach supports a more proportionate distribution of development and reduces the extent of landscape, biodiversity and land-use effects. However, lower growth scenarios also involve trade-offs, including reduced flexibility in housing supply, lower economic benefits and, in the case of the lowest growth scenarios (particularly **Scenario 7**), more limited opportunities to support strategic infrastructure and coordinated mitigation.
- 4.4.8 The appraisal also highlights an important distinction between the benefits of concentrating development in the most accessible location and the effects associated with overall scale and distribution of growth. While directing development to Moreton-in-Marsh supports sustainable travel and climate change mitigation, higher overall levels of growth (particularly where development is delivered alongside, rather than instead of, growth in less accessible settlements) can increase total travel demand and place additional pressure on infrastructure. This demonstrates that outcomes are influenced not only by where development is located, but also by the overall quantum of growth and its distribution.
- 4.4.9 **Overall, the appraisal demonstrates that each scenario presents a different balance of sustainability effects.** The key trade-offs relate to the scale of growth, the distribution of development between settlements, and the extent to which development can be delivered in a coordinated manner alongside infrastructure and mitigation measures.
- 4.4.10 A summary of the overall rankings for each scenario and likely effects (including significant effects) is provided in **Table 4-2** below.

Table 4-2: Summary of appraisal findings, including overall rankings and likely significant effects for each scenario

Topic		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
 Biodiversity	Rank	6	4	5	3	2	1	7
	Significance	+/-	+/-	+/-	+/-	+/-	+/-	--
 Climate Change (adaptation)	Rank	6	3	5	4	2	1	7
	Significance	+/-	+/-	+/-	+/-	+	+	--
 Climate Change (mitigation)	Rank	1	2	6	4	5	3	7
	Significance	+/-	+/-	+/-	+/-	+/-	+/-	--
 Economy and Employment	Rank	1	2	3	5	4	6	7
	Significance	++	++	++	++	++	++	+/-
 Equalities	Rank	4	3	1	5	2	6	7
	Significance	+	+	++	+	++	+	+/-
 Green Infrastructure and Natural Capital	Rank	3	4	6	5	2	1	7
	Significance	+/-	+/-	+/-	+/-	+/-	+/-	--
 Healthy and Vital Communities	Rank	5	2	6	3	4	1	7
	Significance	+/-	+/-	+/-	+/-	+/-	+	-

Topic		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
 Historic Environment	Rank	2	1	7	=4	=4	3	=4
	Significance	+/-	+	--	-	-	+/-	-
 Housing	Rank	4	1	2	3	5	6	7
	Significance	+	++	++	++	+	+	+
 Landscape	Rank	4	3	=6	5	2	1	=6
	Significance	-/+	+/-	--	--	-/+	-/+	--
 Land, Soil and Water Resources	Rank	7	3	5	4	2	1	6
	Significance	--	+/-	-	-	+/-	+/-	--
 Transport and Air Quality	Rank	6	1	5	3	4	2	7
	Significance	+/-	++	+/-	+/-	+/-	++	--

4.5. Developing the preferred approach

- 4.5.1 The preferred approach of the Cotswold District Local Plan 2026-2043 meets (and exceeds) LHN and employment land requirements through a **spatial strategy focused on the district's most sustainable settlements**, whilst avoiding significant growth within the Cotswolds National Landscape. This preferred approach aligns with **Scenario 2** tested through the IIA.
- 4.5.2 **The preferred approach directs the majority of development to Cirencester and Principal Settlements**, with most development coming forward through strategic-scale allocations capable of delivering supporting infrastructure, services and facilities alongside new development. Approximately 87% of proposed development is located at Cirencester and Principal Settlements, with 13% directed to Non-Principal Settlements. In addition, **approximately 95% of proposed development is located outside of the Cotswolds National Landscape**, with the limited development proposed within the designation restricted to smaller sites unless exceptional circumstances apply. Approximately 73% of development is directed to the south of the district, reflecting the concentration of services, employment opportunities and sustainable transport connections in and around Cirencester.
- 4.5.3 Strategic growth maximises opportunities to deliver infrastructure, including schools, local centres, community facilities, public transport improvements and cycling, walking and wheeling connections, whilst also supporting comprehensive masterplanning and coordinated delivery. **As the majority of new development is proposed on strategic allocations that realistically, take some time before they are delivering housing at their optimum level, it is necessary to propose a 'stepped' housing trajectory.** This essentially means the plan would support the delivery of different levels of housing in five-year periods, with less than the annualised need (for the whole Plan period) proposed for the first five years, and more, in the last five years.
- 4.5.4 **The preferred approach is underpinned by a broad spatial strategy that remained consistent across all of the reasonable alternatives assessed through the IIA process.** This includes strategic allocations at Cirencester, Preston, Siddington, Down Ampney, Fairford, Kemble and the proposed new settlement at Driffield, together with a range of non-strategic allocations distributed across Principal and Non-Principal Settlements. The IIA reasonable alternatives assessment therefore focused on the principal variable elements of the strategy, namely the distribution and scale of development at Moreton-in-Marsh, Mickleton and Ampney Crucis. In this respect, the preferred approach aligns with **Scenario 2**, comprising medium-high growth at Moreton-in-Marsh, higher growth at Mickleton and no strategic growth at Ampney Crucis.

- 4.5.5 **The preferred approach is also consistent with national policy relating to strategic-scale and mixed-use development.** Paragraph 77(b) of the NPPF recognises that large numbers of homes can often be most effectively delivered through larger-scale developments, including significant urban extensions, and that such developments should support sustainable communities with access to services and employment opportunities. Paragraph 111(a) further supports an appropriate mix of uses within larger-scale developments to minimise the number and length of journeys required for employment, shopping, leisure, education and other day-to-day activities. **The preferred approach reflects these principles through the allocation of comprehensively master planned mixed-use sites capable of delivering housing, employment land, schools, local centres, community facilities and green infrastructure in a coordinated manner.**
- 4.5.6 **A key component of the preferred approach is the allocation of 2,200 dwellings to the south and east of Moreton-in-Marsh,** together with a comprehensive package of supporting infrastructure, including a new secondary school and a new road connecting the A429 and A44. This level of development is considered sufficient to support significant infrastructure delivery whilst avoiding the substantially larger scale of growth that would be required to facilitate a full link road around the settlement. Land is also safeguarded to support the delivery of additional development and the completion of the link road through a future plan-making process, should sufficient funding and growth requirements arise.
- 4.5.7 **The preferred approach also includes a strategic allocation of 1,238 dwellings at Mickleton,** together with associated infrastructure including a primary school, local centre, public transport improvements, open space and green infrastructure. Mickleton is relatively unconstrained in the district context, located outside the Cotswolds National Landscape and within proximity of Honeybourne railway station, Chipping Campden and employment opportunities at Meon Vale and Long Marston. The preferred approach therefore seeks to utilise one of the more sustainable locations in the north of the district whilst supporting its long-term sustainability.
- 4.5.8 **The preferred approach does not include strategic growth at Ampney Crucis.** Whilst the village was considered through the IIA reasonable alternatives appraisal, the preferred approach instead focuses strategic growth in settlements considered better able to accommodate significant development and supporting infrastructure. This approach helps to direct growth towards more sustainable locations whilst reducing potential impacts associated with substantial growth at a relatively small village.
- 4.5.9 **Employment provision is focused alongside strategic housing growth** at locations including Cirencester, Fairford, Kemble and Driffield, supporting a closer relationship between homes, jobs and services.

5. Part 2: What are the appraisal findings at this stage?

5.1. Introduction to the appraisal

- 5.1.1 **Part 2** of the IIA Report presents an appraisal of the current version of the Plan against the IIA Framework, with the findings presented under each of the IIA themes. The appraisal in **Part 2** has been prepared in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations, assessing the likely significant effects of the Plan.
- 5.1.2 The Regulation 19 version of the Plan includes 'Core Policies' and 'Development Policies'. The **Core Policies** set out the strategic approach for the district, addressing the overall **Spatial Strategy** and key strategic matters such as housing, employment, infrastructure and environmental protection. The **Development Policies** provide more detailed criteria to guide decision-making and to support the delivery and implementation of the Core Policies when determining planning applications.
- 5.1.3 Within the main body of the IIA Report (see **Chapter 9**), a series of narratives are presented under each IIA theme, providing a commentary on the spatial strategy, district-wide policy provisions, cumulative and in-combination effects, and overall conclusions (relevant to each IIA theme – i.e., there is no systematic consideration of each individual policy, instead policies are drawn upon as relevant to the IIA objective in question). A summary of the appraisal findings is presented below (for each IIA theme), followed by any recommendations for plan-makers at this stage.

5.2. Summary of the appraisal findings

Biodiversity

- 5.2.1 The Plan is expected to have **positive effects for biodiversity** through the protection and enhancement of ecological assets, the delivery of biodiversity net gain, and the strengthening of green infrastructure and ecological networks. Whilst development has the potential to affect sensitive ecological receptors, the policy framework provides a robust basis for avoiding, reducing and mitigating adverse effects. Overall, the Plan is expected to support improved ecological resilience and nature recovery across the district.

Climate change adaptation

- 5.2.2 The Plan is expected to have **positive effects for climate change adaptation** through a strong framework of policies relating to flood risk, water management, sustainable drainage, climate-resilient design and green and blue infrastructure. Whilst a number of allocations are affected

by climate-related constraints, including flood risk and groundwater flooding, the Plan incorporates a range of site-specific and policy-based measures intended to avoid, reduce and mitigate these risks. Overall, the Plan is expected to improve the resilience of communities, development and infrastructure to the effects of climate change over the long term.

Climate change mitigation

- 5.2.3 The Plan is expected to have **positive effects for climate change mitigation** through a comprehensive framework of policies promoting net zero carbon development, renewable and low carbon energy, sustainable transport and active travel. The spatial strategy supports this approach by directing growth towards the district's most sustainable settlements, including locations with access to the rail network, whilst strategic allocations incorporate measures designed to reduce reliance on private car travel. Overall, the Plan is expected to contribute to a long-term reduction in greenhouse gas emissions across the district.

Economy and employment

- 5.2.4 The Plan is expected to have **positive effects for economy and employment** through the delivery of employment land, support for key economic sectors, protection of existing employment sites and investment in infrastructure and connectivity. The spatial strategy aligns housing and employment growth across the district, helping to support sustainable economic development, improve access to jobs and strengthen local communities. Overall, the Plan is expected to support long-term economic growth, business resilience and employment opportunities across the district.

Equalities

- 5.2.5 The Plan is expected to have **positive effects for equalities** through a strong focus on inclusive design, accessibility, community infrastructure and the delivery of affordable, accessible and specialist housing. Policies relating to sustainable transport, access to services, digital connectivity and health and wellbeing further support equitable outcomes for different groups across the district. Overall, the Plan is expected to promote social inclusion and improve access to housing, services and opportunities for all residents, including those with protected characteristics.

Green infrastructure and natural capital

- 5.2.6 The Plan is expected to have **positive effects for green infrastructure and natural capital** through the protection, enhancement and long-term management of green and blue infrastructure assets. The strategic allocations, policy framework and supporting concept frameworks provide significant opportunities to strengthen green infrastructure networks, improve access to natural greenspace, deliver multifunctional environmental benefits and enhance ecosystem services. Overall, the Plan

is expected to contribute positively to the quality, resilience and connectivity of the district's natural assets.

Healthy and vital communities

- 5.2.7 The Plan is expected to have **positive effects for healthy and vital communities** through the delivery of housing, infrastructure, community facilities and accessible green spaces in sustainable locations. A strong emphasis on inclusive design, active travel, health and wellbeing, and access to services will help support healthier lifestyles and community cohesion. Whilst some settlements will accommodate significant levels of growth relative to their existing size, the Plan seeks to ensure that development is supported by the timely delivery of infrastructure and community facilities. Overall, the Plan is expected to contribute to the creation of well-connected, inclusive and resilient communities across the district.

Historic environment

- 5.2.8 The Plan is expected to result in **mixed, but predominantly positive, effects on the historic environment**. Whilst a significant number of allocations are located in proximity to heritage assets, conservation areas and scheduled monuments, creating potential for adverse effects on their significance and setting, the Plan includes a robust framework of heritage, design and place-making policies alongside site-specific mitigation measures. These provide a strong basis for avoiding, reducing and mitigating adverse effects, whilst also creating opportunities for heritage-led regeneration and the long-term conservation of the district's historic environment.

Housing

- 5.2.9 The Plan is expected to have **positive effects for housing** through meeting LHN and providing a headroom which allows for flexibility and contingency over the plan period. This reduces the risk of under-delivery and helps ensure that housing needs can be met even where some sites come forward more slowly than expected (i.e., due to the longer lead in times associated with strategic allocations). It also supports a stable supply of land, which is important for maintaining delivery over the long term. More broadly, policy support for affordable housing, accessible and adaptable homes, specialist accommodation, and Gypsy and Traveller provision will help meet a diverse range of housing needs. Overall, the Plan is expected to improve housing choice, affordability and availability, contributing to the creation of sustainable and inclusive communities.

Landscape

- 5.2.10 The Plan is expected to result in **mixed effects for landscape**. Whilst the spatial strategy has sought to direct major growth away from the most sensitive landscapes where possible, a number of allocations are located

within or in proximity to the Cotswolds National Landscape and Special Landscape Areas, and development will inevitably result in landscape change in some locations. However, the Plan incorporates a strong framework of landscape, design and green infrastructure policies, together with site-specific mitigation measures, which should help to conserve landscape character, protect important views and integrate development into its surroundings.

Land, soil and water resources

- 5.2.11 The Plan is expected to result in **mixed effects for land, soil and water resources**. Whilst it includes a strong framework for the sustainable management of water resources, water quality, drainage and resource efficiency, a significant proportion of development will take place on greenfield land, including land classified as Grades 1–3 agricultural land. Growth also has the potential to increase pressure on water resources and groundwater systems. However, the Plan incorporates comprehensive measures relating to water efficiency, sustainable drainage, groundwater protection and pollution prevention, which should help to avoid, reduce and mitigate adverse effects.

Transport and air quality

- 5.2.12 The Plan is expected to result in **mixed, but predominantly positive, effects on transport and air quality**. The spatial strategy directs growth towards the district's most sustainable settlements and incorporates opportunities to support active travel, public transport use and access to the rail network. Whilst planned growth will inevitably generate additional traffic and may increase reliance on private vehicles in some rural locations, the Plan includes a comprehensive framework of policies promoting sustainable transport, modal shift, public transport, electric vehicle infrastructure and air quality improvement. Together, these measures should help to minimise adverse effects and support more sustainable travel patterns over the long term.

5.3. Recommendations at this stage of plan making

- 5.3.1 **The IIA has not identified any significant issues which require amendments to the spatial strategy or policy framework at this stage of plan preparation.** However, careful implementation of the Plan will be important, particularly in relation to landscape, heritage, biodiversity, transport and infrastructure delivery. The effectiveness of mitigation measures should therefore be monitored through the Plan's monitoring framework and reviewed where necessary.

6. Part 3: What are the next steps?

6.1. Consultation on the Regulation 19 version of the Local Plan

- 6.1.1 The IIA has informed the preparation of the Regulation 19 Local Plan and the development of its spatial strategy, allocations and policy framework.
- 6.1.2 Consultation responses received on the Regulation 19 Local Plan and accompanying IIA Report will be reviewed by the Council and considered by plan makers tasked with finalising the Plan.

6.2. Submission, examination and adoption

- 6.2.1 Following the consultation period, the Council will consider the representations received and determine whether the Plan remains suitable for submission for independent examination. The Plan, together with the IIA Report and other supporting evidence, will then be submitted to the Secretary of State for independent examination.
- 6.2.2 During the examination process, the Inspector will consider the soundness and legal compliance of the Plan, taking account of representations received and the findings of the IIA. Where modifications are required, these will be subject to further consultation and, where necessary, additional appraisal before the Plan is adopted.

6.3. Monitoring

- 6.3.1 The Environmental Assessment of Plans and Programmes Regulations (2004) require the significant environmental effects of implementing the Plan to be monitored. Monitoring helps to identify any unforeseen adverse effects arising from implementation of the Plan and enables appropriate remedial action to be taken where necessary.
- 6.3.2 The Plan contains a comprehensive monitoring framework which includes a range of indicators relating to housing delivery, employment growth, biodiversity, climate change, infrastructure provision, heritage, transport and other sustainability objectives. The monitoring framework therefore provides an important mechanism for tracking many of the environmental, social and economic effects identified through this IIA.
- 6.3.3 In particular, monitoring should focus on the key sustainability issues identified through the appraisal process, including:
- delivery of housing and employment development;
 - provision of affordable housing and specialist accommodation;
 - biodiversity net gain and habitat enhancement;

- delivery and long-term management of green infrastructure;
- greenhouse gas emissions, renewable energy generation and net zero carbon development;
- transport mode share, active travel uptake and air quality;
- impacts on the historic environment;
- impacts on the Cotswolds National Landscape and other valued landscapes;
- flood risk, water quality and water resource management; and
- provision of infrastructure, services and community facilities.

6.3.4 Particular attention should be given to monitoring potential adverse or mixed effects identified through the IIA, including landscape change associated with development within or close to the Cotswolds National Landscape, effects on heritage assets and their settings, the loss of agricultural land, pressures on water resources and the transport impacts associated with planned growth.

6.3.5 Where monitoring identifies significant unforeseen adverse effects, or where the Plan is not performing as anticipated, the Council should consider whether additional mitigation measures, policy interventions or a review of the Plan are required.