

Somerford Keynes Neighbourhood Plan



**Strategic environmental
assessment**

Screening Opinion

June 2016

Somerford Keynes Neighbourhood Plan Strategic Environmental Assessment

Screening Opinion

Quality information

Document name	Ref	Prepared for	Prepared by	Date
Screening Opinion	Somerton Keynes Neighbourhood Plan	Cotswold District Council	Nick Chisholm-Batten Principal Consultant	6 th June 2016

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Introduction

This Screening Opinion has been prepared on behalf of Cotswold District Council by AECOM in relation to the Somerset Keynes Neighbourhood Plan 2015-2030 (SKNP).

The purpose of this Screening Opinion is to set out an opinion in relation to whether a strategic environmental assessment (SEA) process is required to accompany the development of the Neighbourhood Plan. The Screening Opinion has been provided to the statutory consultation bodies for SEA (Historic England, the Environment Agency and Natural England) for their opinion.

Neighbourhood plan information

Title of the plan:

Somerset Keynes Neighbourhood Plan (SKNP).

Name of Qualifying Body and Local Planning Authority:

The qualifying body preparing the SKNP is Somerset Keynes Parish Council. The Local Planning Authority is Cotswold District Council.

SKNP contact point:

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Location and spatial extent of the SKNP:

The Neighbourhood Plan covers the Somerset Keynes Neighbourhood Area, comprising the parish of Somerset Keynes in Gloucestershire (Figure 1 below). Somerset Keynes is located in the southern part of Gloucestershire adjacent to the Wiltshire boundary, 8km south of Cirencester and 24km north west of Swindon. Located within the Cotswold Water Park, the Neighbourhood Area includes the village of Somerset Keynes and the hamlet of Shorncote.

Timeframe of the SKNP:

To 2031.

Latest progress of the SKNP:

The Neighbourhood Group have prepared a draft of the SKNP. It is anticipated that the Regulation 14 version of the Neighbourhood Plan will be released for consultation later in summer 2016.

Main aims of the SKNP:

The vision of the Neighbourhood Plan formulated during early stages of the Neighbourhood Planning process is as follows:

“To maintain and enhance a vibrant community which is an attractive location to live, work and visit.”

The objectives for the Neighbourhood Plan are as below:

Settlement and Housing:

- To improve the demographic balance and, thereby, the continuing viability of the community by the appropriate development of housing.

Economy:

- To make the parish an attractive place to work and a sustainable place from which residents can go to work.

Infrastructure:

- To build on the existing infrastructure for the improvement of safety, work opportunities and communications within and between the communities of the Parish and beyond.

Community Facilities:

- To maintain the current amenities of the Parish, develop and add to them to meet the needs of the community now and in the future.

Conservation and Environment:

- To conserve and enhance rural settings, buildings and countryside and adapt, enhance, maintain and protect the environment to improve the sustainability of all the settlements in the parish.

Approach to screening

In order to be ‘made’, Neighbourhood Plans are required to be tested against and meet a number of ‘basic conditions’. One of the basic conditions is whether the making of the Neighbourhood Plan is compatible with European Union obligations, including obligations under the SEA Directive (European Directive 2001/42/EC).

The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or the ‘SEA Regulations’. Regulation⁹ of the SEA Regulations requires that the responsible authority determines whether or not a plan is likely to have significant effects.

To decide whether a proposed Neighbourhood Plan is likely to have significant effects on the environment, and hence requires SEA, it should be screened at an early stage, i.e. once the plan remit and objectives have been formulated as early a stage as possible.

The National Planning Practice Guidance advises that a neighbourhood plan proposal is more likely to require SEA where:

- “a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.”

Screening is ‘Stage A’ in the government’s recommended six stage approach to SEA for Neighbourhood Plans outlined in the NPPG. If it is determined, through screening, that significant environmental effects are unlikely and hence SEA is not required, then further SEA is not required.

The screening process is illustrated in **Figure 2**. The Local Planning Authority, Cotswold District Council, in this case is undertaking the screening opinion and determination.

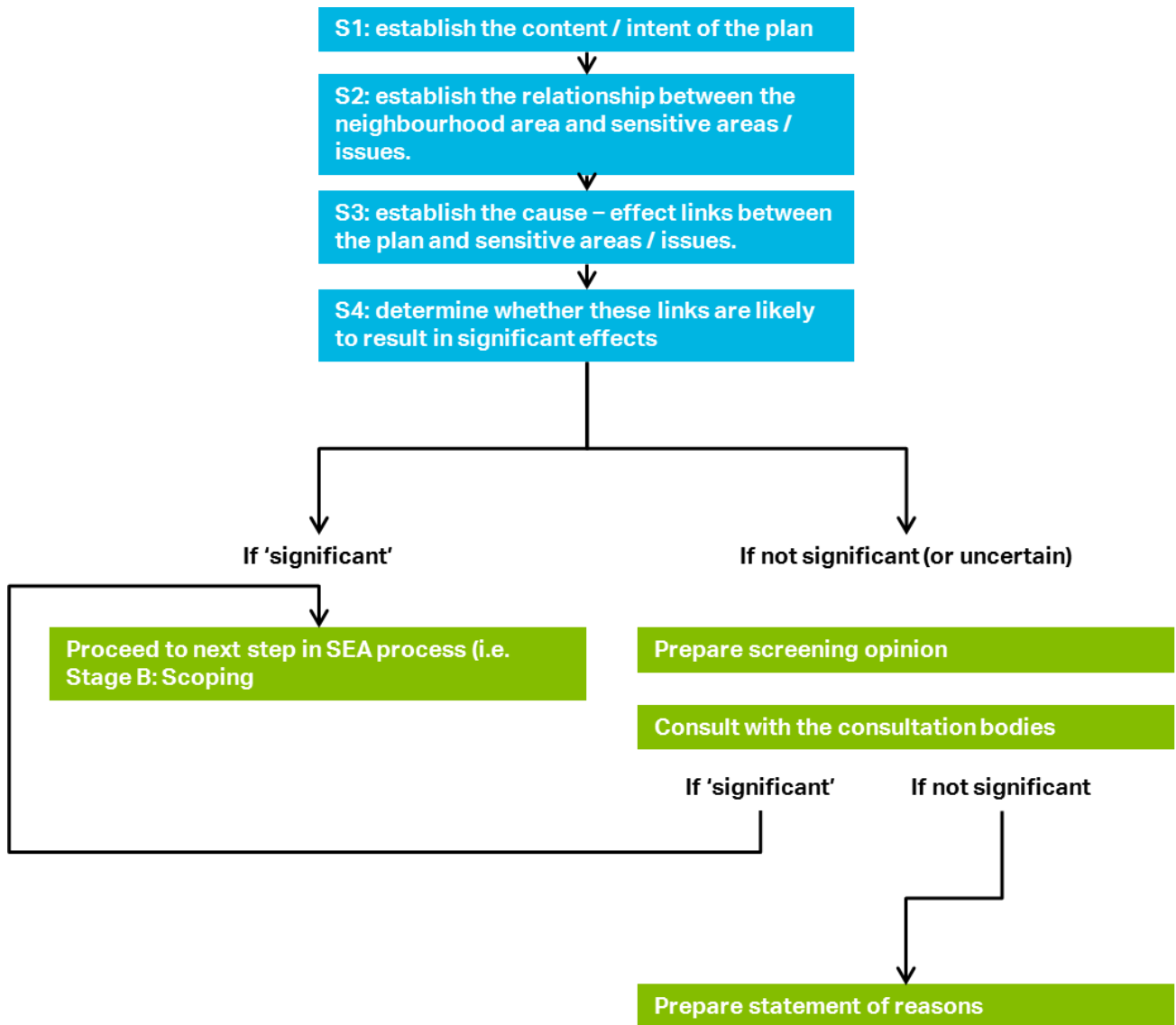


Figure 2: SEA screening process

Relationship with the Cotswold District Local Plan

The SKNP is being prepared in the context of the emerging Cotswold District Local Plan.

The current plan comprises the saved policies of the Local Plan 2001-2011 and its appendices. However, the policies covering strategic housing and employment allocations are currently out of date, and will be presented through the new Cotswold District Local Plan.

Two recent Regulation 18 consultations have been undertaken on elements of the Local Plan. The most recent consultation was undertaken in November 2015 on the *Local Plan Regulation 18 Consultation: Planning Policies*. This presented a series of development management and planning policies, setting criteria by which planning applications and site allocations will be considered and determined in the District.

Prior to this, consultation was undertaken on the *Local Plan Regulation 18 Consultation: Development Strategy and Site Allocations* document, which was undertaken in January 2015. This presented a development strategy for the District to 2031 and included strategic policies and site allocations for housing, employment and other uses. A Regulation 19 'Pre-Submission' consultation is due to be undertaken in early summer of this year. The new Local Plan is subsequently anticipated to be submitted to the Secretary of State for Examination later in 2016.

The development plan for the Somerford Keynes Neighbourhood Area will, when made, comprise the Cotswold District Local Plan and the SKNP. Whilst the new Local Plan has not yet been adopted, the SKNP is being prepared with due regard to the emerging plan to ensure conformity.

Somerford Keynes is not classified as one of the 'Principal Settlements' in Cotswold District by the Local Plan, and is instead classified as a rural settlement. Given that the Somerford Keynes does not have a shop or a post office, the Local Plan does not consider the village suitable for residential development.

Will the SKNP propose allocations? And if so, will these be over and above those likely to be included in the emerging Local Plan?

The latest version of the Local Plan (*Cotswold District Local Plan Submission Draft Reg. 19*) does not allocate any housing or employment sites in the Neighbourhood Area.

The draft SKNP does not allocate housing or employment sites. Instead it indirectly facilitates small-scale residential development within the existing settlement boundary where a series of criteria are met.

What are the key environmental sensitivities in the vicinity of the Somersetford Keynes Neighbourhood Area?

Sensitive areas

A key determinant of whether effects are likely to be significant is the sensitivity of the asset affected. In this context, the more environmentally sensitive a location, the more likely it is that potential environmental effects from a plan will be significant.

The National Planning Practice Guidance (NPPG) provides guidance on this topic through providing a list of sites and areas which should be deemed as 'sensitive areas' for the purposes of environmental assessment¹. These comprise:

- Natura 2000 sites;
- Sites of Special Scientific Interest (SSSI);
- National Parks;
- Areas of Outstanding Natural Beauty;
- World Heritage Sites; and
- scheduled monuments².

In the context of the categories of 'sensitive areas' described by the NPPG, the following sites and areas exist within and in the vicinity of the Neighbourhood Area.

Natura 2000 sites

Within the Neighbourhood Area

The North Meadow and Clattinger Farm Special Area of Conservation (SAC) is located on the south western boundary of the Neighbourhood Area. It is one of two sites representing lowland hay meadows near the centre of its UK range. The site represents an exceptional survival of the traditional pattern of management and so exhibits a high degree of conservation of structure and function. This site also contains a very high proportion (>90%) of the surviving UK population of fritillary *Fritillaria meleagris*, a species highly characteristic of damp lowland meadows in Europe and now rare throughout its range

No Special Protection Areas (SPAs) are present within the Neighbourhood Area.

Within 10km of the Neighbourhood Area

None.

SSSIs

Within the Neighbourhood Area

One section of the Cotswold Water Park SSSI is located in the south of the Neighbourhood Area.

The Cotswold Water Park is an extensive system of lakes formed by mineral extraction from the Upper Thames floodplain in south-east Gloucestershire and north-west Wiltshire. A series of lakes has been selected to cover the range of variation of the plant communities associated with these nationally scarce marl waters. These lakes also contribute to the importance of the Cotswold Water Park for wintering and breeding birds. The part of the SSSI within the parish comprises one small lake, Freeth Mere.

SSSIs are split into units. Natural England assesses the condition of all SSSIs units as part of a six year cycle to help monitor the health of these sites in the longer term. The most recent assessment (July 2009) of the unit (Freeth Mere) within the Neighbourhood Area is 100% 'unfavourable declining'. This is due to the high frequency of *Elodea nutallii* (100%), low water quality (presence of algae) and low charophyte cover.

This increases the sensitivity of the site to polluting activities in the parish.

¹ I.e. those sites and areas that should be considered 'sensitive' for the purposes of screening projects for Environmental Impact Assessment.

² <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/screening-schedule-2-projects/interpretation-of-project-categories/>

Within 3km of Neighbourhood Area

Five further units of the Cotswold Water Park SSSI are located adjacent or close to parish boundaries. Two of these have been assessed as being in 'favourable' condition, with three assessed as in 'unfavourable declining' condition.

National Parks

Within the Neighbourhood Area

None.

In the vicinity of the Neighbourhood Area

None- the closest National Parks are the Brecon Beacons National Park (located c70km from the Neighbourhood Area) and the South Downs National Park (located c.90km from the Neighbourhood Area).

Areas of Outstanding Natural Beauty

Within the Neighbourhood Area

None.

In the vicinity of the Neighbourhood Area

The Neighbourhood Area is located 3km south east of the Cotswold AONB.

World Heritage Sites

Within the Neighbourhood Area

None.

In the vicinity of the Neighbourhood Area

None- the closest site is the Stonehenge, Avebury and Associated Sites World Heritage Site (located 25km from the Neighbourhood Area).

Scheduled monuments

Within the Neighbourhood Area

No scheduled monument designations are located within the Neighbourhood Area.

In the vicinity of the Neighbourhood Area

Four scheduled monument designations are located within 1km of the boundaries of the Neighbourhood Area:

- Moated site at Church Farm (2.2km south east of Somerford Keynes village)
- Settlement E of Ashtonfield (Cotswold Community) (1.6km east of Somerford Keynes village)
- Water meadow 400m east of Clattinger Farm (1.3km south west of Somerford Keynes village)
- Medieval settlement and associated field system at Clattinger Farm (1.4km south west of Somerford Keynes village)

Further key environmental sensitivities in the Neighbourhood Area

Whilst the areas and features highlighted above are a key influence on the sensitivity of the area, further designated environmental assets are located within the Neighbourhood Area³. These include as follows:

Conservation Areas

The Neighbourhood Area contains one conservation area, the Somerset Keynes Conservation Area. This covers much of the western part of the village. A conservation area appraisal or management plan has not been undertaken for the area.

Listed buildings

The rich historic environment of the Neighbourhood Area is reflected by the presence of 29 nationally listed buildings in the Neighbourhood Area. 27 of these are Grade II listed, with two features at the Church of All Saints Grade II* listed.

Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, and scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. The latest Heritage at Risk Register⁴ highlights that no features are deemed to be at risk in the Neighbourhood Area.

It is understood that a survey of Grade II listed buildings has not yet been carried out in the Neighbourhood Area.

The SSSI, scheduled monuments and listed buildings located in the immediate vicinity of the Neighbourhood Area are presented in **Figure 3**.

³ i.e. those which are not defined as 'sensitive areas' as defined by the NPPG

⁴ Heritage at Risk Register (2015), <http://risk.historicengland.org.uk/register.aspx> [accessed 24/04/16]

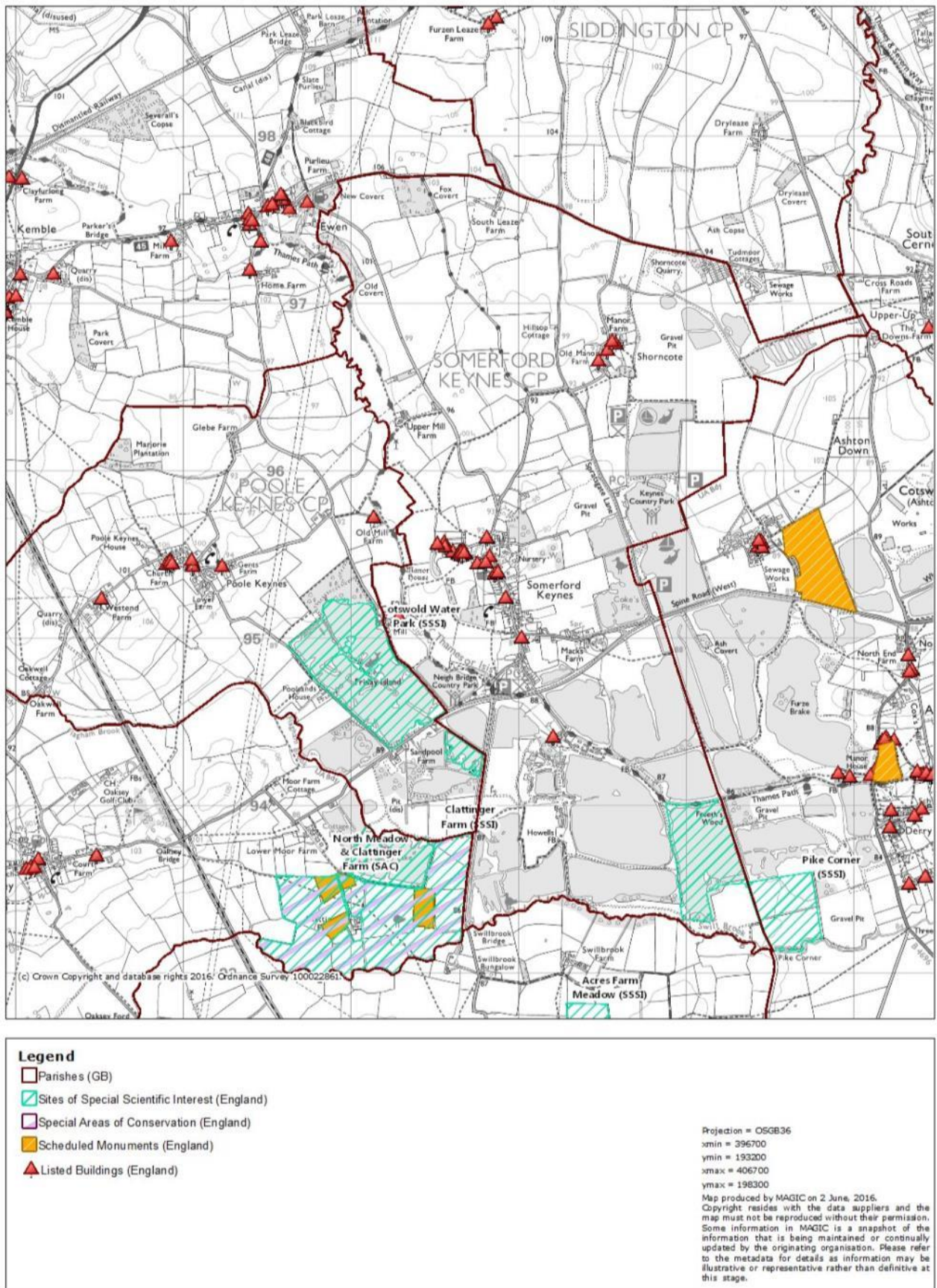


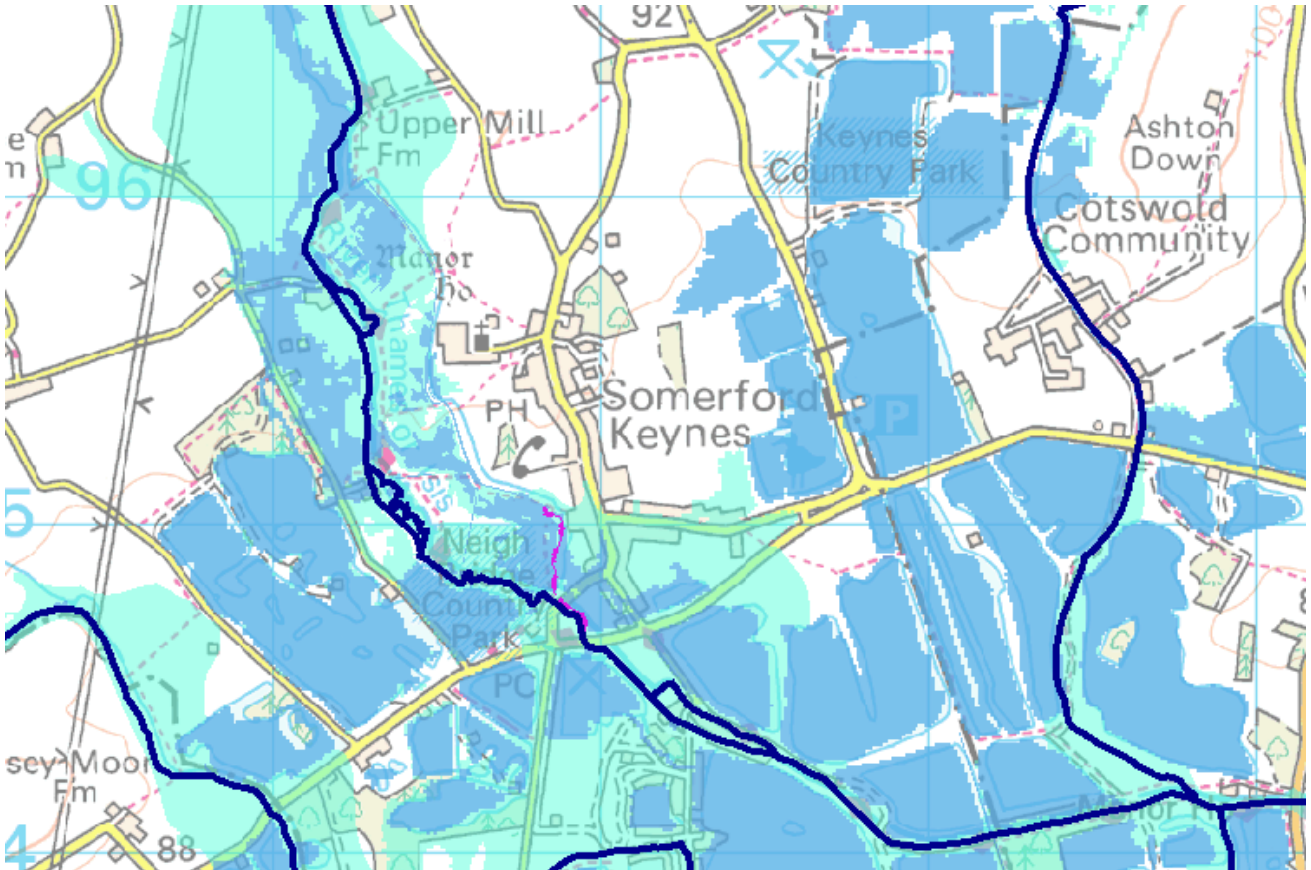
Figure 3: SAC, SSSIs, scheduled monuments and listed buildings present in the vicinity of the Somerford Keynes Neighbourhood Area (source, www.magic.gov.uk)

Source Protection Zones

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. Reflecting the vulnerability of groundwater in the area to pollution, a Zone 2 SPZ covers the northern part of the parish, with a Zone 3 SPZ covers the remaining part of the Neighbourhood Area.

Flood zones

A large proportion of the parish is covered by Flood Zone 2 and 3⁵. This includes the southern part of Somerford Keynes village (Figure 4). As such flood risk is a significant issue in the parish.



- Flood Zone 3
- Flood Zone 2
- Flood defences
(Not all may be shown*)
- Areas benefiting from flood defences
(Not all may be shown*)

Figure 4: Flood Zones in the vicinity of Somerford Keynes (source: Environment Agency, Flood Map for Planning)

⁵ A Flood Zone 3 denotes an area that could be flooded from a river by a flood that has a 1 per cent (1 in 100) or greater chance of happening each year. A Flood Zone 2 denotes an area that could be flooded from a river by a flood that has a 0.1 per cent (1 in 1000) chance of occurring each year.

Assessment

The following presents the environmental effects which have the potential to arise as a result of the SKNP. This is accompanied by a commentary on whether these effects are likely to be significant.

The environmental effects have been grouped by the SEA 'topics' suggested by Annex I(f) of the SEA Directive⁶.

Biodiversity, flora and fauna

(Including biodiversity habitats and species, biodiversity sites, areas of geological interest)

Likely effect: Yes **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

The SKNP does not allocate sites for housing and/or employment. However, the current draft of the Neighbourhood Plan may have indirect effects (positive and negative) on habitats, species and biodiversity networks through facilitating small scale development within the settlement boundary.

The most recent assessment (July 2009) of the unit (Freeth Mere) within the Neighbourhood Area is 100% 'unfavourable declining'. This is due to the high frequency of *Elodea nuttallii* (100%), low water quality (presence of algae) and low charophyte cover. No existing built up areas of the parish are within the SSSI Impact Risk Zones for the types of development that are promoted by the SKNP⁷. In relation to the North Meadow and Clattinger Farm SAC, development areas facilitated through the Neighbourhood Plan is likely to be of a location, scale and type which precludes potential effects on this internationally designated site.

In this context, due to the lack of direct allocations in the Neighbourhood Plan, and the indirect facilitation of very small scale developments, the SKNP is unlikely to lead to additional pressures on the SAC or SSSI. Effects on the sites are also likely to be limited by the provisions of the Cotswold Local Plan and the draft plan's aim to protect and enhance designated nature conservation sites in the parish.

More broadly in relation to biodiversity, the draft plan sets out a range of policy approaches (including as presented by the 'Conservation and Environment' policies) which seek to protect and enhance key habitats, species and designated sites in the parish. This will help to limit the potential effects of the small scale development enabled by the SKNP.

Effects on biodiversity as a result of the Neighbourhood Plan are therefore unlikely to be significant.

Population

(Including residents' quality of life, accessibility to services and facilities, deprivation and similar)

Likely effect: Yes **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

As indicated by the current draft policy approaches proposed for the SKNP, the Neighbourhood Plan has the potential to have a range of benefits for the quality of life of residents and for accessibility to services, facilities and opportunities and community facilities. The plan will also support the delivery of affordable housing for local people of an appropriate size and tenure.

Whilst the benefits for residents of the parish from a well-designed Neighbourhood Plan have the potential to be wide-ranging, these are not deemed to be significant in the context of the SEA Directive.

⁶ The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on 'the environment, **including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors**' [our emphasis].

⁷ SSSI Impact Risk Zones are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

Human health

(Incorporating residents' health and wellbeing)

Likely effect: Yes **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

As indicated by the current policy approaches proposed for the SKNP, the Neighbourhood Plan has the potential to have a range of benefits for residents' health and wellbeing through promoting healthier lifestyles and supporting accessibility to services and facilities.

Whilst the health and wellbeing benefits for residents of the Neighbourhood Area from a well-designed Neighbourhood Plan have the potential to be wide-ranging, these are not deemed to be significant in the context of the SEA Directive.

Soil

(Including agricultural land, soil erosion, soil quality)

Likely effect: No **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

Areas of the Best and Most Versatile Agricultural Land (including Grade 2 and Grade 3a agricultural land) are present in the plan area. However the Neighbourhood Plan does not allocate sites directly. As such there is unlikely to be a direct loss of higher quality agricultural land as a result of the SKNP.

Water

(Including water quality and availability)

Likely effect: No **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

The SKNP does not allocate sites for housing and/or employment. As such the plan unlikely to lead to significant increases in water demand in the Neighbourhood Area.

Whilst, as highlighted by the presence of SPZs, the sensitivity of groundwater in the Neighbourhood Area is high, the Neighbourhood Plan is unlikely to directly lead to activities which result in tangible effects on groundwater quality.

Flood risk issues have been discussed under 'climatic factors' below.

Air

(Including air quality)

Likely effect: Yes **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

No significant air quality issues currently exist in the Neighbourhood Area. However, the SKNP, through its focus on limiting the effects of traffic and congestion in the Neighbourhood Area (including through its support for walking and cycling enhancements and public realm improvements) has the potential to support reductions in emissions.

Climatic factors

(Including relating to climate change mitigation (limiting greenhouse gas emissions) and adaptation (adapting to the anticipated effects of climate change, including flood risk))

Likely effect: Yes **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

In terms of climate change mitigation, the draft policies of the plan actively seek to encourage sustainable modes of transport, including walking and cycling. This will help limit potential increases in greenhouse gas emissions from transport.

In terms of climate change adaptation, statutory requirements (including the requirements of the NPPF) will ensure that flood risk is addressed through new development proposals. However, given the significant

flood risk issues present in the parish, the current draft of the Neighbourhood Plan sets out a range of provisions in relating to flood risk, including relating to the location of new development, drainage, appropriate flood management and the maintenance of flood defences. This will support a limitation of flood risk in the parish.

Both climate change mitigation and adaptation will be supported by SKNP's focus on protecting and enhancing green spaces in the Neighbourhood Area.

In light of the above, the nature and magnitude of positive effects directly arising as a result of the SKNP are unlikely to be significant in the context of the SEA Directive.

Material assets

(Including minerals resources, waste considerations)

Likely effect: Yes **Effect likely to be significant?** No

Description of potential effects and whether they are likely to be significant

Potential increases in waste as a direct result of the SKNP are likely to be limited due to the lack of allocations proposed through the draft plan. Potential increases in waste as an indirect result of the SKNP are likely to be limited by statutory requirements regarding waste management.

No existing mineral sites are likely to be affected as a result of the SKNP- however the plan supports the provisions of the Gloucestershire County Council Minerals Plan and the remediation of former minerals extraction sites.

Due to their limited magnitude, effects are therefore unlikely to be significant in the context of the SEA Directive in relation to this topic.

Cultural Heritage

(Including historic environment, cultural heritage, historic settings)

Likely effect: Yes **Effect likely to be significant?** No

The Somerford Keynes Neighbourhood Area has a rich historic environment with numerous nationally and locally designated features and areas of historic environment value. The potential for effects on the fabric and setting of historic environment assets is therefore a central element to consider.

Direct effects from the SKNP on the setting and fabric of the historic environment through new development proposals will be limited by the lack of allocations in the plan. Whilst indirect effects have the potential to take place through the policy approaches to be promoted through the plan, including through the indirect facilitation of small scale development within the village's settlement boundaries, a key element of the SKNP is the protection and enhancement of the historic environment and villagescape. In this context the draft policies seek to protect key features of importance for the historic environment and support the use of appropriate construction materials. This will have positive effects on cultural heritage assets and their settings.

Given that the Neighbourhood Plan policies will reinforce existing protection to cultural heritage assets and their settings offered by the designation of sites through listing and scheduling, and the designation of the conservation area in the Neighbourhood Area, these positive effects are unlikely to be significant in the context of the SEA Directive.

Landscape

(Including landscape and townscape quality)

Likely effect: Yes **Effect likely to be significant?** No

The sensitive villagescape of Neighbourhood Area is reflected by the presence of the Somerford Keynes Conservation Area.

Direct effects from the SKNP on landscape and villagescape quality through new development proposals will be limited by the lack of allocations in the plan. Whilst indirect effects have the potential to take place through the indirect facilitation of small scale development within the village's settlement boundaries, a key element of the draft plan is to support villagescape quality.

In this context, the SKNP has a close focus on protecting and enhancing local distinctiveness in the Neighbourhood Area and protecting key features of importance for the historic environment. This will help

limit effects on landscape and townscape quality, reinforce existing designations and facilitate enhancements.

Therefore potential effects on landscape character and townscape quality from the SKNP are unlikely to be significant in the context of the SEA Directive.

Conclusions

This determination has considered whether the Somerset Keynes Neighbourhood Plan is likely to lead to significant environmental effects as defined by Directive 2001/42/EC, the 'SEA Directive' and the transposing regulations. In particular, the review has considered environmental sensitivities located in the vicinity of the Neighbourhood Area and the potential environmental effects on these sensitivities that may arise as a result of the Neighbourhood Plan. This includes relating to potential negative effects on the North Meadow and Clattinger Farm SAC, the Cotswold Water Park SSSI, the groundwater SPZs underlying the Neighbourhood Area, the significant flood risk present in the area and the numerous historic environment designations present locally.

Whilst environmental effects (both positive and negative) have the potential to take place as a result of the Neighbourhood Plan, including in relation to the majority of the SEA 'topics', it is considered that these are unlikely to be significant in the context of the SEA Directive. In this context the significance of potential effects will be limited by 1) the SKNP not directly proposing employment or housing allocations 2) the provisions of the NPPF and the emerging Cotswold Local Plan and 3) the objectives and draft policy approaches proposed by the latest version of the SKNP.

For these reasons, it is considered that the Somerset Keynes Neighbourhood Plan is not subject to the requirements of Directive 2001/42/EC, the 'SEA Directive' and accompanying regulations.

Should the scope or nature of the SKNP change substantially through further revisions of the draft plan then this opinion should be revisited, but at present it is considered (to our best available knowledge, and on the basis of the evidence and draft document provided to us) that SEA is not necessary.

Next Steps

Cotswold District Council, as the responsible authority, should give consideration to this screening opinion ahead of reaching a screening determination. Once agreed, the Council should consult with the consultation bodies (Natural England, Historic England and the Environment Agency).

If the Council and / or consultation bodies disagree with this opinion, and the plan is ultimately 'screened-in', then the Parish Council should commence SEA at the earliest opportunity.

Limitations

AECOM Infrastructure & Environment UK Limited (hereafter referred to as "AECOM") has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the use of Cotswold District Council and only those third parties who have been authorised in writing by AECOM to rely on this Report.

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