

Integrated Impact Assessment (IIA) for the Cotswold Local Plan Review

**Interim IIA Report to accompany Regulation 18 consultation on Broad
Locations and Growth Strategy Options**

Cotswold District Council

November 2025

Quality information

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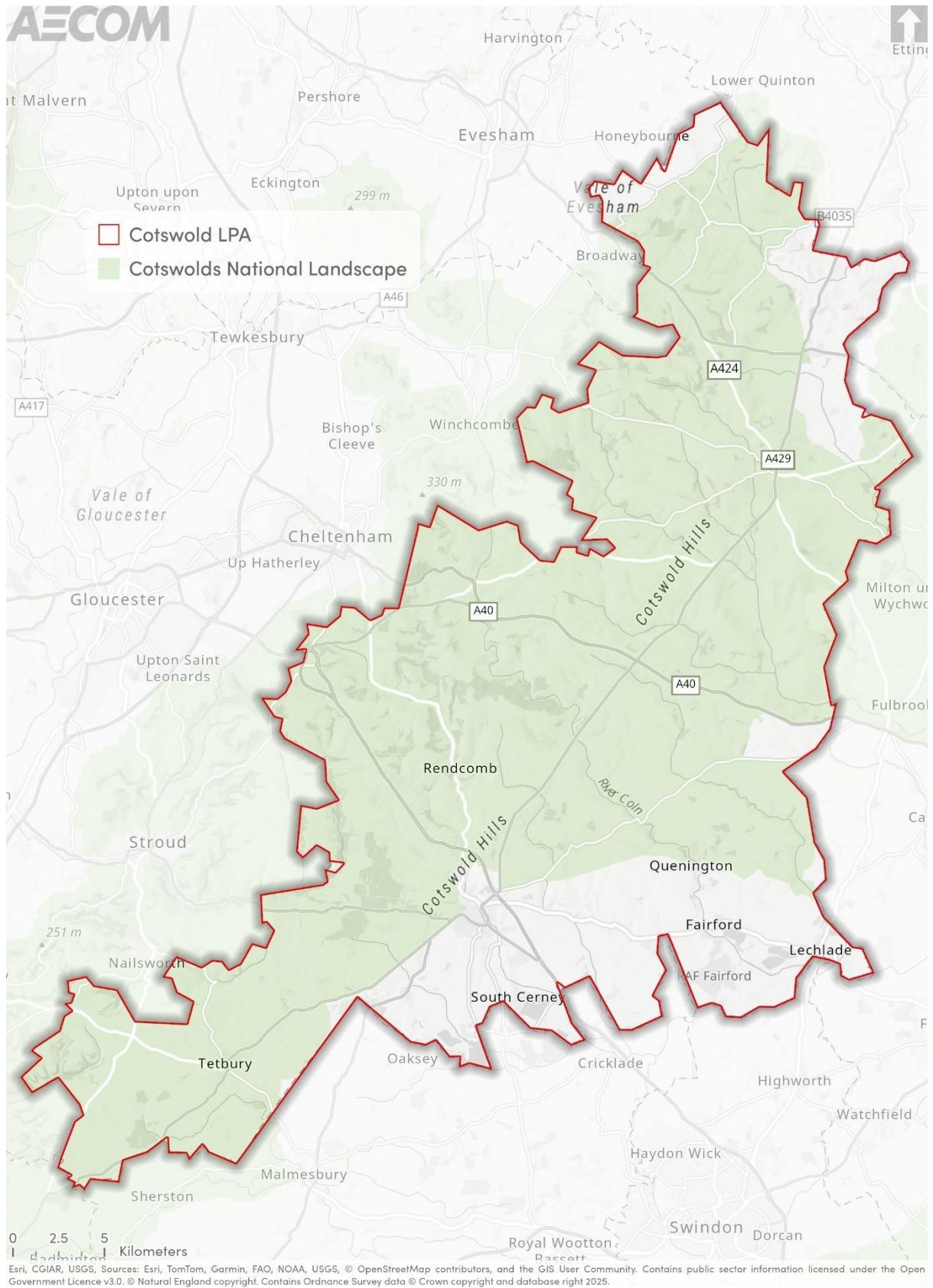


Figure 1: Cotswold District, i.e., the Local Plan area (LPA boundary)

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Integrated Impact Assessment (IIA, incorporating Strategic Environmental Assessment / Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment) in support of Cotswold District Council's emerging Local Plan Review.
- 1.2 This Interim IIA Report is the latest document to be produced as part of the IIA process and accompanies the *Preferred Options* consultation¹ for the Local Plan Review, undertaken for a period of seven weeks between November 2025 and January 2026. The consultation is an interim stage in developing the Local Plan Review and has been prepared under Regulation 18 of the Town and Country Planning (England) Regulations (2012)².
- 1.3 The area covered by the Local Plan Review is shown in **Figure 1** above and encompasses Cotswold District. The Cotswolds National Landscape (formerly Area of Outstanding Natural Beauty) overlaps with approximately 80% of the district.

IIA explained

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

Sustainability Appraisal (SA)

- 1.7 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). It also widens the scope of the assessment from focusing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans.
- 1.8 National Planning Policy Guidance (NPPG) states that the role of SA is "...to promote sustainable development by assessing the extent to which the

¹ Cotswold District Council (2025): [Preferred Options consultation](#)

² UK Government (2012): [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives”³.

1.9 Two key procedural requirements of the SEA Regulations are that:

- When deciding on ‘the scope and level of detail of the information’ which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
- A report (the ‘SA Report’) is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses ‘likely significant effects’ that would result from plan implementation) and reasonable alternatives.

Equalities Impact Assessment (EqIA)

1.10 As a public sector organisation, Cotswold District Council has a duty under the Equality Act 2010⁴ and the associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the district eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with protected characteristics⁵ and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

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

- **Age:** this refers to persons defined by either a particular age or a range of ages.
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity.
- **Marriage and civil partnership:** marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples.
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth.

³ Planning Practice Guidance (2020): [Strategic environmental assessment and sustainability appraisal - GOV.UK](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)

⁴ UK Government: [Equality Act 2010](https://www.gov.uk/guidance/equality-act-2010)

⁵ Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived / disadvantaged groups.

- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins.
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief and includes those people who have no formal religion or belief.
- **Gender:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives.
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and / or sexual attraction and the expression of that attraction.
- **Socio-economic status:** a person's socio-economic status referring to combined economic and sociological measure of a person's work experience and economic and social position in relation to others, based on income, education, and occupation.

Health Impact Assessment (HIA)

- 1.12 There are numerous links between planning and health highlighted throughout the National Planning Policy Framework (December 2024⁶) (hereafter referred to as 'the NPPF'). For example, Paragraph 96 of the NPPF states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities and the NPPG states that Local Planning Authorities should ensure that health and wellbeing, and health infrastructure are considered in Local Plans and in planning decision-making⁷.
- 1.13 In this context, a Health Impact Assessment (HIA) is a tool used to identify and assess the potential impacts of a plan and inform decision-making.

⁶ As updated in February 2025

⁷ Planning Practice Guidance (2022): [Healthy and safe communities](#)

IIA process

- 1.14 The IIA process to support the Cotswold Local Plan Review is undertaken in five stages. This Interim IIA Report is concerned with Stage 2.

Stage 1: Scoping Report

- Establish the context and baseline for the IIA
- Identify key sustainability issues for the Local Plan Review
- 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 Local Plan Review
- Appraise the growth scenarios and identify likely significant environmental effects
- Prepare Interim IIA Report(s) to accompany Regulation 18 consultation(s) on the Local Plan Review

Stage 3: Consult on Local Plan Review and IIA Report

- Appraise the policies and proposals within the draft Local Plan Review
- Prepare the IIA Report to accompany Regulation 19 consultation on the Local Plan Review
- Consult on the Local Plan Review

Stage 4: IIA Report Addendum

- Submission and examination of the Local Plan Review
- Appraisal of modifications

Stage 5: IIA Adoption Statement

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

IIA work to date

Stage 1: IIA Scoping

- 1.15 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 England⁸. These authorities were consulted⁹ on the scope of the IIA in late 2020.
- 1.16 In the time since IIA 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 subsequent stages of 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. See **Appendix A**.
- 1.17 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, ensuring it remains targeted on the most important issues. These issues were then translated into an IIA ‘Framework’ of objectives and appraisal questions¹⁰. The key sustainability issues and IIA Framework are presented in **Appendix B** of this report.
- 1.18 The IIA Framework provides a way in which the sustainability effects of the Local Plan Review and alternatives can be identified and subsequently analysed based on a structured and consistent approach. The IIA Framework and the appraisal findings in this Interim IIA Report have been presented under eleven IIA themes, reflecting the range of information being considered through the IIA process. These are:
- Healthy and Vital Communities.
 - Housing.
 - Economy and Employment.
 - Equalities.
 - Transport and Air Quality.
 - Climate Change (‘mitigation’ and ‘adaptation’ considered separately).
 - Historic Environment.
 - Landscape.
 - Green Infrastructure and Natural Capital.
 - Biodiversity; and
 - Land, Soil and Water Resources.

⁸ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *“by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme”*.

⁹ The responses (along with comments on how these have been considered and addressed through the IIA process) will be presented in the IIA Report which will accompany the pre-submission draft Local Plan at Regulation 19 consultation.

¹⁰ The SA Framework initially presented in the SA Scoping Report has been updated and expanded into an IIA Framework to 1) take into account consultation responses received on scoping and 2) to reflect the expansion of the SA process into an IIA process incorporating HIA and equalities considerations.

Stage 2: Interim IIA Report(s)

- 1.19 Prior to the publication of the revised NPPF in December 2024, the Council had resolved to undertake a partial update of the adopted Local Plan rather than a full review. IIA work to date has been prepared in this context.
- 1.20 The first stage of the Partial Local Plan Update was to identify 'Issues and Options'. This was primarily to make the Local Plan 'green to the core' in response to the council's climate change emergency and ecological emergency declarations. Consultation took place between February and March 2022 under Regulation 18 of the Town and Country Planning (England) Regulations 2012. An [Interim IIA Report](#) was prepared to accompany the consultation, which appraised a number of alternative policy approaches that could be taken through the Local Plan relating to the following issues: biodiversity; zero-carbon development; carbon storage calculations; accessibility; renewable energy within and outside of the Cotswolds National Landscape; economy and employment second home ownership; and tourism.
- 1.21 Between February and March 2023, the Council consulted on two evidence documents to inform the Local Plan making process, specifically: Consultation on Non-Strategic Site Allocations Selection Methodology and Guidance for major development in the Cotswolds National Landscape¹¹.
- 1.22 In January 2024, as there would soon be less than five years remaining of the adopted Local Plan period, the Council decided to proactively begin the process of planning for development requirements beyond 2031 before a lack of a five-year housing land supply became an issue. The Council therefore approved the commencement of a Development Strategy and Site Allocations Plan (2026-41) which would be undertaken in parallel to the Partial Local Plan Update for strategic reasons.
- 1.23 In February to March 2024, the Council undertook consultations on both the 'Draft Policies' of the Partial Local Plan Update and 'Issues and Options' for the Development Strategy and Site Allocations Plan'. An updated [Interim IIA Report](#) accompanied this stage of plan making, appraising development strategy options to inform the preferred approach and evaluating the relative sustainability merits of promoting development at various broad locations in the vicinity of key settlements (following the [points of the compass](#)). The updated Interim IIA Report also assessed the proposed policy revisions.

Current stage of plan making

- 1.24 The NPPF and NPPG¹² introduced a new, mandatory 'standard methodology' (the standard method) for calculating the number of homes needed in each local planning authority area. As a result, the Council agreed to combine the Partial Local Plan Update and the Development Strategy and Site Allocations Plan into a single, and comprehensive, full Local Plan Review. Given the plan period for the Local Plan Review needs to cover a minimum of 15 years from adoption (expected in 2027), the Local Plan period was extended up to 2043.

¹¹ Formerly Area of Outstanding Natural Beauty (AONB)

¹² MHCLG (2025): [Housing and economic needs assessment](#)

- 1.25 For Cotswold District, the revised standard method currently identifies a housing need of 1,036 dwellings per annum (dpa)¹³, which represents a significant¹⁴ 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. This now equates to a total target of 18,650 additional new homes for the new 18-year plan period of the Local Plan Review (2025-2043).
- 1.26 At the current stage of plan making, the Council is consulting on seven development strategy options and is putting forward its preferred development strategy. This strategy will dictate how and where any land for additional development that is needed to meet identified requirements to 2043 should be allocated. This includes broad areas of the district where growth in, for example, housing and employment provision may take place. The identification of specific development sites (and the updated policies) will follow at Regulation 19 consultation (scheduled for June 2026).
- 1.27 The responses from the previous Regulation 18 consultations are still valid and have been taken into consideration. However, the significant increase to the number of homes needed in the district requires the Council to rethink the proposed development strategy for delivering this scale of growth.

This Interim IIA Report

- 1.28 As discussed above, CDC is now undertaking a single, and comprehensive, full review of the Local Plan in light of the revised standard method calculation for the district as outlined in the NPPF and NPPG. This builds-upon the earlier stages of plan making (and IIA work) for the Local Plan Partial Update and the Development Strategy and Site Allocations Plan.
- 1.29 As such, the aim of this Interim IIA Report is to present an appraisal of revised growth scenarios for the Local Plan Review. This is for the benefit of those who might wish to make representations through the *Preferred Options* (Regulation 18) consultation which is being undertaken for a period of seven weeks between 14th November 2025 and 2nd January 2026.
- 1.30 The remaining chapters in this Interim IIA Report have been structured into three parts, as follows:
- **Part 1** provides an outline of the reasons for selecting the reasonable alternatives (i.e., the 'growth scenarios') dealt with through the IIA for the Local Plan Review.
 - **Part 2** presents the appraisal of these growth scenarios, determining the likely significant environmental effects of the scenarios for each theme that has been scoped into the IIA process.
 - **Part 3** sets out the next steps for the IIA process and plan making.

¹³ This figure is based on the standard methodology calculation provided by the [MHCLG's recalculation of housing needs in December 2024](#). This figure is periodically updated to reflect new housing affordability data and household estimates and is to be reassessed in the Council's Housing and Economic Needs Assessment.

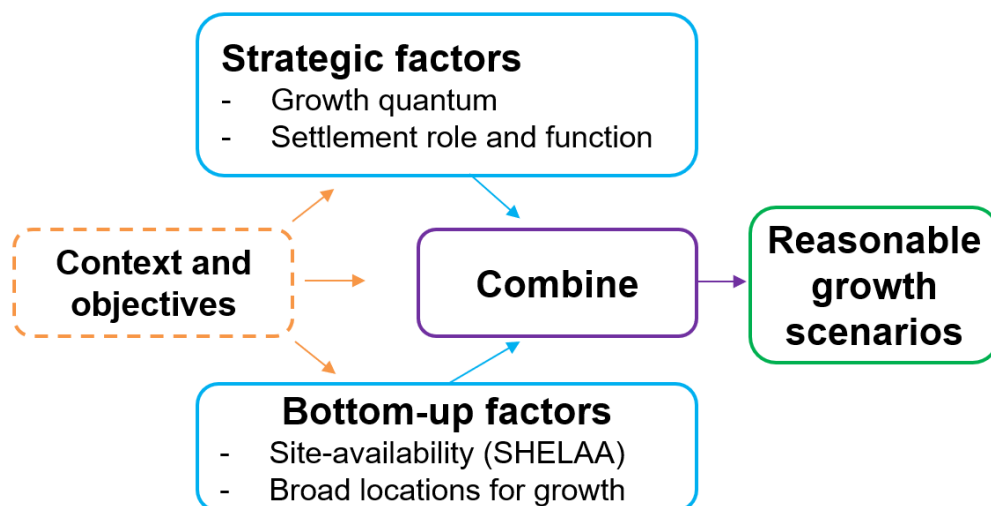
¹⁴ NPPF Paragraph 34

Part 1: Defining reasonable alternatives

2. Establishing growth ‘scenarios’

Introduction

- 2.1 The requirement is to appraise and consult upon “*the plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*”. As such, it is “the plan” that is the primary focus when considering reasonable alternatives, although there is also scope to consider alternatives for specific aspects of the plan.
- 2.2 In light of the above, the IIA has explored reasonable alternatives in respect of the matter at the very heart of any local plan, namely the spatial strategy, i.e. providing for a supply of land for development, including by allocating sites, in order to provide for objectively assessed needs alongside delivering on wider plan objectives.
- 2.3 **Part 1** of this report explains how the strategic context for Cotswold District has been drawn on to establish alternatives for appraisal and then consultation at this Regulation 18 stage. These comprise ‘scenarios’ for the distribution of growth through the Local Plan Review. Ultimately, the aim of **Part 1** is to present ‘an outline of the reasons for selecting the alternatives dealt with’, in accordance with the SEA Regulations¹⁵. To reiterate, growth scenarios equate to **reasonable alternatives**.
- 2.4 A standard broad process to define growth scenarios is as follows:



- 2.5 This process is described in the following sub-sections of **Part 1**:
- Top-down (strategic) factors, primarily the housing context (i.e., how much development is needed, regardless of capacity).
 - Bottom-up factors (i.e., site availability) and the potential broad locations for development across the district¹⁶; and
 - Combining ‘top-down’ and ‘bottom-up’ factors to arrive at the growth scenarios for the IIA.

¹⁵ UK Government (2004): [The Environmental Assessment of Plans and Programmes Regulations 2004](#) (Schedule 2 (8))

¹⁶ As identified through the Assessment of [Broad Strategic Development Locations \(2025\)](#)

Top-down (strategic) factors

Housing context

- 2.6 For Cotswold District, the revised standard method identifies a housing need of 1,036 dwellings per annum (dpa)¹⁷, 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.
- 2.7 In the context of the above, the following housing targets will apply for the Local Plan Review:
1. A total of 18,650 additional new homes are needed for the emerging plan period (up to 2043).
 2. There are already 6,150 homes in the pipeline that can contribute towards delivering this housing target. These are:
 - planning permissions that have not yet been built.
 - remaining site allocations from the adopted Local Plan; and
 - future windfalls (an estimation of sites that will not specifically be identified in the Local Plan).
 3. Additional sites capable of delivering 12,500 homes are needed to fully deliver the housing target (i.e. $18,650 - 6,150 = 12,500$ homes).
- 2.8 It is important to be clear that providing for established needs, as far as is consistent with sustainable development¹⁸, is a key aspect of local plan-making. As part of this, there is a need to plan for the 'target' figure provided by the NPPF and then identify a supply of land sufficient to deliver on the committed housing requirement.
- 2.9 NPPF paragraph 72 then sets out that identified supply should be in the form of: specific "deliverable sites" for years one to five of the plan period; specific "developable sites or broad locations for growth" for years 6-10; and "where possible", developable sites or broad locations for years 11-15 of the plan.
- 2.10 If there are insufficient deliverable / developable sites and the full development needs cannot be delivered inside the district, the Council would need to ask neighbouring authorities whether they can accommodate some of the unmet need via the 'duty to cooperate'¹⁹. The Council would then set a housing requirement in its Local Plan Review that is lower than the number of homes that is needed, but that matches the deliverable / developable housing land supply. Additionally, in accordance with national planning policy and guidance, a potential under-delivery necessitates the application

¹⁷ This figure is based on the standard methodology calculation provided by the [MHCLG's recalculation of housing needs in December 2024](#). This figure is periodically updated to reflect new housing affordability data and household estimates and is to be reassessed in the Council's Housing and Economic Needs Assessment.

¹⁸ NPPF Paragraph 7 defines sustainable development as "meeting the needs of the present without compromising the ability of future generations to meet their own needs".

¹⁹ The duty to cooperate was introduced by the [Localism Act 2011](#), and is set out in [section 33A of the Planning and Compulsory Purchase Act 2004](#). It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

of a buffer to the five-year housing land supply to provide flexibility and resilience in the event of delivery delays or site non-implementation.

- 2.11 A similar situation exists for the need for other types of development (such as employment and retail) that cannot be fully delivered in the district. Evidence in regard to employment and infrastructure needs and sites has been commissioned and will form part of the Regulation 19 consultation on the draft Local Plan Review (and IIA), scheduled for June 2026. See **Part 3** of this report for confirmation of the next steps.

Settlement role and function

- 2.12 In light of the increased housing need figure, the Council have reconsidered (in broad terms) where is more/less suited to accommodating growth by revisiting their settlement hierarchy.
- 2.13 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.
- 2.14 The Study defines a number of Principal and Non-Principal Settlements, with the rest of the district classified as Rural Settlements. Some of the Principal Settlements are also defined as 'Main Service Centres'.
- 2.15 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
- 2.16 A total of 13 locations have been defined as Non-Principal Settlements (including Village Clusters):
- Avening
 - Bledington
 - Broadwell
 - Longborough
 - North Cerney
 - Preston
 - The cluster of Coln St Aldwyns, Hatherop and Quenington
 - Bibury
 - Bourton-on-the-Hill
 - Down Ampney
 - Meysey Hampton
 - Poulton
 - Willersey
- 2.17 In comparison, the adopted Local Plan (2018) identifies 17 Principal Settlements and does not identify Non-Principal Settlements. Compared to the adopted Cotswold Local Plan, the following changes are observed:

- Down Ampney and Willersey change from a Principal Settlement to a Non-Principal Settlement; and
- Siddington becomes a Principal Settlement.

2.18 It is important to note that the final settlement hierarchy in the Local Plan Review may change, as it will factor in the amount of additional planned growth and any additional services, facilities, employment provision, etc. resulting from that growth.

Bottom-up factors

2.19 Having discussed ‘top down’ strategic factors with a bearing on defining growth scenarios, the next step is to give ‘bottom up’ consideration to detailed area and site-specific factors. In practice, this means discussing the potential locations for development and what growth typologies are supported (e.g., large ‘strategic’ sites vs. smaller sites).

Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 2.20 Many sites are submitted to the Council as potential land for development, whereas further assessment is required to confirm their deliverability and suitability. There can be various reasons why a site is undeliverable, as a site may have multiple ownership, be restricted to certain use classes, or lack technical evidence to demonstrate the viability of bringing forward development within the emerging plan period. Sites may also be unsuitable for development, for example, because of flood zones, impacts on landscape, protected habitats, historic buildings etc., as well as the sustainability and accessibility of sites.
- 2.21 All submitted sites go through the Council’s site assessment process (i.e., the SHELAA) which applies a series of filters to progressively identify which sites should be rejected and which should be recommended for allocation. A comprehensive explanation of each of these filters can be found in the Council’s Site Allocation Selection Methodology Topic Paper accompanying this *Preferred Options* consultation.
- 2.22 To date, a total of 15 sites have been identified and appraised through the SHELAA for their potential of accommodating strategic-level growth. The Council have reopened their ‘call for sites’ to invite all submissions, particularly sites which might have potential for strategic-level growth (i.e., a minimum of 500 homes) or sites within the identified ‘areas of interest’ in the *Preferred Options* consultation document.

Assessing Broad Locations for growth

- 2.23 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 in broad locations outside of the National Landscape. This could be achieved through large urban extensions to existing settlements, or through the creation of new settlements.

- 2.24 The Council's [Assessment of Broad Strategic Development Locations](#) (November 2025) identifies 29 'Broad Zones' that could be considered for future strategic-scale development outside of the National Landscape. The assessment conclusions found no 'obvious' locations that could readily accommodate strategic-scale growth. However, it identifies areas that would require further detailed assessment (in terms of mitigating constraints etc.) to determine suitability and the level of development that could occur (if any).
- 2.25 The IIA has appraised the relative sustainability merits of the 29 'Broad Zones' against the IIA Framework. Findings are presented in **Appendix C** of this Interim IIA Report. It is noted that the full impact of development in specific locations will need to be assessed in detail, in order to determine the actual suitability of those areas. This will be informed by site availability and explored in further detail during the next stages of plan making (and the IIA).

Arriving at growth scenarios

- 2.26 The 'top-down' and 'bottom-up' factors that have been considered through this part of the report require the IIA to revisit and refine the district-wide scenarios which have been considered to date through the IIA; as presented at earlier Regulation 18 consultations for the Local Plan Review.
- 2.27 In this context, seven growth scenarios have been tested through the IIA to inform the Council's choice of spatial strategy. The scenarios comprise a total housing number for each settlement which reflects a broad understanding of site deliverability / developability. These are as follows:

Growth scenarios with wide distributions but no strategic sites

- **Scenario 1:** Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters and support Rural Exception Sites in Rural Settlements.
- **Scenario 2:** Allocate sites in Principal Settlements, Non-Principal Settlements, Village Clusters and Rural Settlements.

Growth scenarios with more focused distributions and strategic sites

- **Scenario 3:** Main service centre focus.
- **Scenario 4:** Focus growth around transport nodes.

Growth scenarios with wide distributions and a greater focus on delivering strategic sites

- **Scenario 5:** Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s).
- **Scenario 6:** Allocate sites in Principal Settlements, Non-Principal Settlements and Village Clusters. Support Rural Exception Sites in Rural Settlements. Create new settlement(s) and/or strategic extensions to existing settlement(s) including major development within the Cotswolds National Landscape; and

- **Scenario 7:** Maximise growth across the district (for example, via additional new settlement(s) / strategic extensions).
- 2.28 The indicative capacities for all potentially deliverable / developable non-strategic site options in the Principal and Non-Principal Settlements identified through ongoing work on the Council's SHELAA (to date) have been incorporated into the scenarios, even if this would mean that some of the settlements would double (or in some cases, triple) in size. This reflects 1) the significant increase in housing needs for the district resulting from the NPPF and NPPG, 2) the presumption against major development taking place within the Cotswolds National Landscape (which covers approximately 80% of the district) other than in exceptional circumstances and development being in the public's interest (as per NPPF paragraph 190), and 3) advice received from the Planning Inspectorate to date (with discussions ongoing)²⁰.
- 2.29 The total for each scenario includes the planning permissions that have not yet been built, the remaining site allocations from the adopted Local Plan, and future windfalls (an estimation of sites that will not specifically be identified in the Local Plan).
- 2.30 Whilst five of the seven scenarios take consideration of strategic development sites, none of the scenarios consider the 'Broad Zones' as identified in the Assessment of Broad Strategic Development Locations. This is given site availability for strategic scale development in these areas has not yet been established. As discussed, the Council have reopened their 'call for sites' process on this basis. It is anticipated that the scenarios will be refined and updated as plan making evolves, with the findings presented and appraised in the IIA Report accompanying Regulation 19 consultation on the draft Local Plan Review.
- 2.31 Key variables between the scenarios include:
- Scenarios 1 and 2 are low growth options. The total number of homes in the Rural Settlements increases in Scenario 2 as it reflects a more dispersed approach.
 - Scenarios 3 and 4 would deliver focused distributions and (along with Scenario 5) the inclusion of strategic site options. These scenarios only include strategic site options which are 1) suitable based on the ongoing work on the Council's SHELAA findings (to date) and 2) located outside of the Cotswolds National Landscape. Scenario 5 includes all of the strategic site options which meet these two criteria.
 - Scenarios 6 and 7 seek to maximise growth across the district, recognising that Scenarios 1-5 fall short of meeting housing requirements. For Scenario 6, all of the non-strategic site options within the Cotswolds National Landscape have been included within the Principal and Non-Principal Settlements, along with strategic site options which are also in the National Landscape. For Scenario 7, the capacities at two of the strategic site options have been increased (Ampney Crucis, and Driffield). Scenario 7 also incorporates a strategic

²⁰ Cotswold District Council (2025): [Meeting the Housing Target Challenge](#)

site option which is outside of the National Landscape but has been assessed in the SHELAA to be unsuitable (Kemble Airfield).

- 2.32 A description of each scenario is provided below, with the housing land supply from each scenario shown in **Table 2.1** which follows. Further information about the scenarios can be found in the Council's Development Options Strategy Technical Report accompanying the *Preferred Options* Consultation.

Scenario 1

- 2.33 This scenario would be a continuation of the current development strategy which focusses the majority of additional growth at Principal Settlements. In addition, and going beyond what the adopted Local Plan currently does, this scenario would identify the Non-Principal Settlements and Village Clusters as locations to proactively allocate sites for development.
- 2.34 Additional housing would be supported in Rural Settlements as Rural Exception Sites. These developments would normally not be permitted but would aim to provide 100% affordable housing and meet a local housing need.
- 2.35 The total housing supply of the Local Plan period from Scenario 1 is estimated to be approximately **7,840 homes**. **This is 42% of the government target of 18,650 homes.**

Scenario 2

- 2.36 This scenario incorporates Scenario 1 but adds a more 'dispersed' approach to the future pattern of development so that instead of growth being steered mainly towards the district's Principal and Non-Principal Settlements, it would also be located within small villages and hamlets (Rural Settlements) across the district. The Rural Settlements have very limited or no services, facilities or employment provision.
- 2.37 Many of the homes that would come forward in Rural Settlements from this scenario would either have been Rural Exception Sites or be included within the windfall allowance for Scenario 1. This means that the number of houses that are gained by this scenario is limited.
- 2.38 The total housing supply of the Local Plan period from Scenario 2 is estimated to be approximately **8,230 homes**. **This is 44% of the government target of 18,650 homes.**

Scenario 3

- 2.39 Scenario 3 would focus the vast majority of future development (beyond existing commitments) at Main Service Centres. These Main Service Centres offer a broad range of services and facilities, good public transport accessibility and provide a mix of job opportunities.
- 2.40 Some of the settlements with potential to be Main Service Centres lie within the Cotswolds National Landscape where the scale and extent of development is expected to be limited. Under this scenario, proportionately less development (beyond existing commitments) would take place in Principal Settlements that are not Main Service Centres.

- 2.41 The total housing supply of the Local Plan period from Scenario 3 is estimated to be approximately **9,420 homes. This is 51% of the government target of 18,650 homes.**

Scenario 4

- 2.42 This scenario puts future growth (beyond existing commitments) along key public transport corridors and around public transport hubs (e.g. rail stations and bus routes). It would see all future additional growth focused in locations where there are good current and potential future opportunities to connect to public transport networks.
- 2.43 In terms of bus services, some parts of the district have a reasonably good level of service. However, coverage across much of the rest of the district, in particular more rural areas, is sporadic or even non-existent in some locations, particularly during off-peak periods.
- 2.44 In terms of rail services, Cotswold District has two railway stations. Kemble railway station serves the Golden Valley Line (London - Swindon - Cheltenham). Moreton-in-Marsh railway station serves the North Cotswold Line (London - Oxford - Worcester). Kingham railway station is located in West Oxfordshire District but serves the east of Cotswold District. This area is constrained by its location inside the Cotswold National Landscape.
- 2.45 The total housing supply of the Local Plan period from Scenario 4 is estimated to be approximately **9,190 homes. This is 49% of the government target of 18,650 homes.**

Scenario 5

- 2.46 This scenario would include the development set out in Scenario 1 as well as new settlements and/or strategic extensions to existing settlements. As a minimum, settlements with strategic growth would as a minimum (grow to) include all the services, facilities, employment provision and accessibility standards found within a Non-Principal Settlement.
- 2.47 Delivering a new settlement or strategic site has a long lead in time from conception of the idea to the first spade being put in the ground. These locations would therefore be expected to deliver housing and other types of development towards the mid to end of the new Local Plan period and would also likely continue delivering into the next Local Plan period.
- 2.48 As there is a presumption against major development taking place within the Cotswolds National Landscape other than in exceptional circumstances and development being in the public interest, any new settlement or strategic site would need to be located outside of this area.
- 2.49 The total housing land supply of the Local Plan period from Scenario 5 is estimated to be approximately **14,660 homes. This is 79% government target of 18,650 homes.**

Scenario 6

- 2.50 Scenario 6 retains all strategic sites and settlement growth identified in Scenario 5. But unlike Scenario 5, it includes all non-strategic sites within the Cotswolds National Landscape, irrespective of whether they constitute

major development or have high landscape sensitivity. It also includes three strategic sites within the Cotswolds National Landscape²¹.

- 2.51 This scenario is intended to test the upper limits of potential growth across the district, including areas that are subject to greater planning constraints due to their landscape designation. National landscapes have the highest status of national policy protection. Major development within them should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.
- 2.52 The total housing land supply of the Local Plan period from Scenario 6 is estimated to be approximately **23,580 homes. This is 126% of the government target of 18,650 homes.**
- 2.53 Reflecting the Council's current understanding of site availability across the district, Scenario 6 is the only approach which would meet (and exceed) the government's standard method calculation for the housing need in the district (either with or without strategic site options in the Cotswolds National Landscape). **However, given this option is contrary to national planning policy on restricting major development within National Landscapes, scenario 6 is not considered to be a viable option.**

Scenario 7

- 2.54 Scenario 7 tests a further theoretical housing capacity across Cotswold District by combining all elements of previous growth scenarios (excluding Scenario 6). In other words, it includes all of the development proposed in the Scenarios 1 to 5, with the addition of new settlements and/or strategic extensions (outside of the National Landscape) in locations that have been assessed to be unsuitable for development.
- 2.55 The total housing land supply of the Local Plan period from Scenario 6 is estimated to be approximately **16,200 homes. This is 87% of the government target of 18,650 homes.**

²¹ Scenario 6 of the Preferred Options Consultation Document in October 2025 includes major development sites within the Cotswolds National Landscape. Scenario 6 within this IIA also takes consideration of three strategic site options within the Cotswolds National Landscape to also test the sustainability and implications of adding strategic growth in the National Landscape to this scenario. This increases the total housing land supply for Scenario 6 from 19,320 homes (as stated within the Consultation Document) to 23,580 homes (as tested through the IIA)."

Table 2.1: Growth scenarios assessed through the IIA

| | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 |
|---|------------|------------|------------|------------|------------|------------|------------|
| Non-strategic allocations in Principal Settlements | | | | | | | |
| Andoversford | 130 | 130 | | 130 | 130 | 450 | 130 |
| Blockley | 130 | 130 | | | 130 | 450 | 130 |
| Bourton-on-the-Water | 230 | 230 | 230 | 230 | 230 | 340 | 230 |
| Chipping Campden | 230 | 230 | 230 | | 230 | 830 | 230 |
| Cirencester | 2,820 | 2,820 | 2,820 | 2,820 | 2,820 | 2,820 | 2,820 |
| Fairford | 470 | 470 | 470 | | 470 | 470 | 470 |
| Kemble | 30 | 30 | | 30 | 30 | 30 | 30 |
| Lechlade-on-Thames | 220 | 220 | | | 220 | 220 | 220 |
| Mickleton | 590 | 590 | | | 590 | 750 | 590 |
| Moreton-in-Marsh | 420 | 420 | 420 | 420 | 420 | 760 | 420 |
| Northleach | 80 | 80 | | 80 | 80 | 870 | 80 |
| Siddington | 30 | 30 | | | 30 | 30 | 30 |
| South Cerney | 110 | 110 | | | 110 | 110 | 110 |
| Stow-on-the-Wold | 150 | 150 | 150 | 150 | 150 | 1,320 | 150 |
| Tetbury | 320 | 320 | 320 | | 320 | 1,410 | 320 |
| Upper Rissington | 30 | 30 | | | 30 | 30 | 30 |
| Non-strategic allocations in Non-Principal Settlements | | | | | | | |
| Avening | 70 | 70 | | | 70 | 230 | 70 |
| Bibury | 40 | 40 | | | 40 | 280 | 40 |
| Bledington | 10 | 10 | | | 10 | 90 | 10 |
| Bourton-on-the-Hill | 10 | 10 | | | 10 | 10 | 10 |
| Broadwell | 20 | 20 | | | 20 | 20 | 20 |
| Down Ampney | 420 | 420 | | 420 | 420 | 420 | 420 |
| Longborough | 40 | 40 | | 40 | 40 | 310 | 40 |
| Meysey Hampton | | | | | | | |

| | Scenario 1 | Scenario 2 | Scenario 3 | Scenario 4 | Scenario 5 | Scenario 6 | Scenario 7 |
|---|---------------|---------------|---------------|---------------|---------------|----------------|---------------|
| North Cerney | 30 | 30 | | | 30 | 30 | 30 |
| Poulton | 30 | 30 | | | 30 | 30 | 30 |
| Preston | 170 | 170 | | 170 | 170 | 170 | 170 |
| Willersey | 180 | 180 | | | 180 | 450 | 180 |
| The cluster of Coln St Aldwyns, Hatherop, and Quenington | 80 | 80 | | | 80 | 200 | 80 |
| Other Rural Settlements and open countryside and rural exception sites (windfalls) | 750 | 1,140 | 1,890 | 1,040 | 750 | 750 | 1,140 |
| Other potential new settlements and/or strategic extensions | | | | | | | |
| Strategic extension north of Ampney Crucis | | | | | 660 | 660 | 730 |
| New settlement near Driffield | | | | | 840 | 840 | 960 |
| Strategic extension south of The Steadings, Cirencester | | | 400 | 400 | 400 | 400 | 400 |
| Strategic extension north-east of Fairford | | | 780 | | 780 | 780 | 780 |
| Strategic extension south-west of Kemble | | | | 590 | 590 | 590 | 590 |
| Strategic extension north, south and east of Moreton-in-Marsh | | | 1,710 | 1,710 | 1,710 | 1,710 | 1,710 |
| Strategic extension south of Preston | | | | 960 | 960 | 960 | 960 |
| Strategic extension north, south and west of Siddington | | | | | 880 | 880 | 880 |
| Strategic extension north east of Chipping Campden | | | | | | 960 | |
| Strategic extension north and south of North Cerney | | | | | | 960 | |
| Strategic extension north of Stratton, Cirencester | | | | | | 960 | |
| New settlement at Cotswold Airport, near Kemble | | | | | | | 960 |
| Total | 7,840 | 8,230 | 9,420 | 9,190 | 14,660 | 23,580 | 16,200 |
| Local Housing Need (LHN) | 18,650 | 18,650 | 18,650 | 18,650 | 18,650 | 18,650 | 18,650 |
| Percent of LHN met through option | 42.04% | 44.13% | 50.51% | 49.28% | 78.61% | 126.43% | 86.86% |

Part 2: Assessing reasonable alternatives

3. Appraisal of growth scenarios

Appraisal methodology

- 3.1 The growth scenarios presented in **Part 1** above 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 B**)
- 3.2 The appraisal findings are presented relation to the seven growth scenarios introduced above. These are organised by the IIA themes and use the IIA Framework. 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 (-). 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 '7' the least favourable ranking.
- 3.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the scenarios under consideration. In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the appraisal text.
- 3.4 Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.
- 3.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects.
- 3.6 The appraisal findings are discussed below. The following information is presented:
 - A summary of the appraisal findings (see **Table 3.1**), including the ranking of each scenario and identifying the likely significant environmental effects relating to each IIA theme.
 - A detailed overview of the relative sustainability merits of each scenario, presented as a commentary of effects for each IIA theme); and
 - Conclusions and recommendations at this stage of plan making.

Appraisal findings

Headline appraisal findings

3.7 **Table 3.1** below presents a summary of the appraisal findings for each growth scenario (GS), for each IIA theme.

Table 1.1 Summary of appraisal findings

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|-------------------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Healthy and vital communities | Rank | =5 | =5 | =1 | =1 | =3 | 7 | =3 |
| | Likely significant effect? | - | - | ++ | ++ | +/- | - | +/- |
| Housing | Rank | 7 | 6 | 4 | 5 | 3 | 1 | 2 |
| | Likely significant effect? | -- | -- | - | - | + | ++ | + |
| Economy and employment | Rank | =6 | =6 | =4 | =4 | 1 | 2 | 3 |
| | Likely significant effect? | -- | -- | - | - | ++ | ++ | ++ |
| Equalities | Rank | =6 | =6 | =4 | =4 | =2 | 1 | =2 |
| | Likely significant effect? | - | - | + | + | ++ | ++ | ++ |
| Transport and air quality | Rank | =6 | =6 | 2 | 1 | =3 | =3 | =3 |
| | Likely significant effect? | - | - | + | ++ | +/- | +/- | +/- |
| Climate change mitigation | Rank | =6 | =6 | =1 | =1 | =3 | =3 | =3 |
| | Likely significant effect? | - | - | + | + | +/- | +/- | +/- |
| Climate change adaptation | Rank | =1 | =1 | =3 | =3 | =5 | 7 | =5 |
| | Likely significant effect? | 0 | 0 | - | - | - | - | - |
| Historic environment | Rank | =3 | =3 | 1 | 2 | =5 | 7 | =5 |
| | Likely significant effect? | - | - | - | - | -- | -- | -- |
| Landscape | Rank | =1 | =1 | =3 | =3 | 5 | 7 | 6 |

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|--|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| | Likely significant effect? | +/- | +/- | +/- | +/- | - | -- | -- |
| Green infrastructure and natural capital | Rank | =6 | =6 | =1 | =1 | =3 | 5 | =3 |
| | Likely significant effect? | - | - | + | + | +/- | - | +/- |
| Biodiversity | Rank | =1 | =1 | =1 | =1 | =5 | =5 | =5 |
| | Likely significant effect? | +/- | +/- | +/- | +/- | +/- | +/- | +/- |
| Land, soil and water resources | Rank | =3 | =3 | =1 | =1 | =5 | =5 | =5 |
| | Likely significant effect? | 0 | 0 | 0 | 0 | +/- | - | +/- |

Healthy and vital communities

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|-------------------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Healthy and vital communities | Rank | =5 | =5 | =1 | =1 | =3 | 7 | =3 |
| | Likely significant effect? | - | - | ++ | ++ | +/- | - | +/- |

- 3.8 The Main Service Centres and Principal Settlements offer the widest range of services and facilities in the district and are therefore well-placed to accommodate future growth. A focus of growth in these locations (as proposed through **Scenario 3**) has the potential to support the longer-term sustainability and healthy place-shaping of these settlements. This is because these settlements best support active travel use due to their proximity to services and facilities, which will support physical and mental health, and are less likely to lead to social isolation (which may be more prevalent in the Non-Principal Settlements and Rural Settlements). This scenario would also support opportunities to rejuvenate and revitalise town centre environments and deliver growth in the most accessible and well-connected locations. This is particularly important for Cirencester, given its role and function as the largest urban community in the district.
- 3.9 Whilst the other scenarios also direct a level of growth to the Main Service Centres and Principal Settlements, they also direct growth to the Non-Principal Settlements in the district. These settlements are generally more poorly served in terms of access to services and facilities and public transport, and growth in these locations may cumulatively place strain on local infrastructure capacity. The exception to this is **Scenario 4** which focuses growth around transport nodes (although there is some growth in the Non-Principal Settlements of Down Ampney, Longborough, and Preston). In doing so, this scenario also performs well as residents will have good access, either directly or via sustainable and accessible modes of transport, to the settlements with the widest range of services and facilities.
- 3.10 Despite the above, scenarios which deliver a proportion of future growth in the Non-Principal Settlements have the potential to support their vitality whilst also enabling development sites to be locally identified (e.g. through Neighbourhood Plans). These scenarios (**Scenarios 1, 2, 5, 6 and 7**) encourage a dispersed approach via village 'clusters', based on the services, facilities, employment provision, and transport accessibility they can cumulatively offer. They would therefore consider the 'collective' opportunities presented by settlements rather than treating each in isolation, facilitating development opportunities in locations where historically this may not have been possible. This coordinated approach to delivering growth may enable win-win opportunities to be realised, which may include opportunities to create well-designed, 'green to the core', sustainable, and self-sustaining locations for new homes, jobs, and supporting services and facilities. However, potential impacts are perhaps less significant in comparison to focusing growth at the Main Service Centres and Principal Settlements due to the lower level of growth proposed at the Non-Principal Settlements.

- 3.11 It is noted that the growth proposed at some of the Non-Principal Settlements under some of the scenarios is particularly high. For example, under **Scenarios 1, 2, 4, 5, 6 and 7**, the level of growth proposed at Down Ampney and Preston would result in these villages almost tripling in size. In addition, under **Scenarios 5, 6 and 7**, Ampney Crucis and Preston (under Scenario 4 as well) would both significantly increase in size. This could lead to significant adverse effects on community vitality, including the quality of life of existing residents, especially if development is not accompanied by new community infrastructure. This level of growth would also likely have an adverse impact on the 'sense of place' of these villages.
- 3.12 Proposals for larger, strategic sites have the potential to generate developer contributions which could provide additional (or expand existing) services and facilities, positively contributing to community vitality and wellbeing. In this respect, **Scenarios 5, 6 and 7** perform particularly well as they have a greater focus on strategic extensions. These scenarios would deliver at least one new settlement (and two in the case of Scenario 7) in the district. Paragraph 77 of the NPPF recognises that careful consideration should be given to several factors such as infrastructure opportunities (existing or planned), size and location (ability to be self-supporting), and the quality of places (e.g. garden city principles). However, it is also noted that the delivery of new settlements and large strategic sites have a relatively long lead-in time from conception to delivery. Therefore, the potential benefits of these scenarios are only likely to be realised towards the latter half of the plan period. Nevertheless, some of the strategic sites are of a scale which could accommodate additional growth beyond the plan period too, and in this respect, they represent longer term opportunities for growth.
- 3.13 It is noted that **Scenario 6** delivers the highest level of growth of the scenarios through additional non-strategic scale growth at locations within the Cotswolds National Landscape, as well as three additional strategic extensions at Chipping Campden, North Cerney, and Stratton (Cirencester). As a result, under this scenario Chipping Campden would quadruple in size, whilst North Cerney would also grow significantly. This could lead to significant adverse effects on community vitality, particularly regarding the 'sense of place' of these settlements, especially North Cerney, a Non-Principal Settlement.
- 3.14 In conclusion, scenarios which have a more focused approach to distributing growth across the district (**Scenarios 3 and 4**) are considered to perform most favourably under this IIA theme and are therefore ranked highest with **major positive effects** anticipated. Scenarios 1, 2, 5, 6 and 7, whilst also facilitating growth within Main Service Centres and Principal Settlements, are ranked less favourably as they direct a proportion of growth to the Non-Principal Settlements in the district, which could place strain on local infrastructure capacity. However, it is acknowledged that these scenarios would support a wider distribution of growth across the district. In this respect, delivering a proportion of growth within the Non-Principal Settlements and Rural Settlements may also support their longer-term vitality and deliver more balanced communities.
- 3.15 The low level of growth proposed under **Scenarios 1 and 2** may negatively impact locations which could potentially support higher levels of growth (i.e. the Main Service Centres and Principal Settlements). This is because they

may limit opportunities to facilitate new community infrastructure and positive placemaking principles, thereby contributing less to delivering balanced communities and sustainable growth. In addition, lower growth scenarios will deliver proportionately less growth in Rural Settlements, which may increase their isolation and widen inequalities across the district. Due to this, **minor negative effects** are noted under Scenarios 1 and 2.

- 3.16 **Scenarios 5 and 7** deliver several strategic extensions which would likely deliver new community infrastructure to these settlements. These scenarios also deliver proportionately more homes, although still below the local housing need figure, and are therefore ranked above Scenarios 1 and 2. However, as Scenarios 5 and 7 may still place strain on local infrastructure capacity at the Non-Principal Settlements, **mixed effects** are noted. Even though **Scenario 6** is the only scenario which exceeds the local housing need figure and will likely support opportunities to deliver significant new community infrastructure due to the inclusion of new strategic extensions, the level of growth proposed through this scenario is considered likely to adversely impact the sense of place of some settlements. As such, this scenario is ranked last and **minor negative effects** are considered likely at this stage.

Housing

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|-----------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Housing | Rank | 7 | 6 | 4 | 5 | 3 | 1 | 2 |
| | Likely significant effect? | -- | -- | - | - | + | ++ | + |

- 3.17 Many larger settlements (e.g. Cirencester, Tetbury and Moreton-in-Marsh) have already absorbed a large amount of housing growth in recent years and/or have future growth already committed. A focus on delivering higher levels of growth at these locations (as proposed through **Scenarios 3, 4, 5, 6 and 7**) has the potential to put pressures on the capacity of existing services and facilities which would serve additional housing growth. Notably, some infrastructure is already lacking in these areas (e.g. sewage treatment works and highway capacity), and as a result some parts of the district are already suffering from overdevelopment. Therefore, it will be essential for new development areas to be accompanied by appropriate infrastructure to meet needs (to support wellbeing). Pressures are considered to be more pronounced through **Scenarios 6 and 7** which would deliver a higher level of growth in these settlements.
- 3.18 Proportionately less development taking place in the Non-Principal Settlements would limit the opportunity to provide new homes in those locations, including affordable housing. However, small and medium-sized sites which are likely to come forward through a more 'dispersed' approach to growth in the district (**Scenarios 1 and 2**) are generally able to deliver new homes more swiftly in comparison to larger strategic sites. Additionally, this approach could offer a greater degree of local influence and control over new development (e.g. new sites brought forward through Neighbourhood Plans). Nevertheless, this approach will contribute less towards meeting housing needs, given larger sites have the potential to deliver more homes, including a greater range of housing types and tenures.

- 3.19 The supply of large numbers of new homes can often be best achieved through planning for larger-scale development such as new settlements or strategic extensions to existing settlements. **Scenarios 5, 6 and 7** perform most favourably in this respect (although it is noted that **Scenarios 3 and 4** also include some strategic sites). However, these scenarios have some key differences. **Scenario 5** allocates all strategic sites which were given a suitable rating through the Council's strategic site assessment; these sites are also all outside of the National Landscape. **Scenario 6** delivers three additional strategic sites which were given an 'unsuitable' rating through the Council's assessment, primarily given they fall within the National Landscape. Finally, **Scenario 7** delivers an additional new settlement at Kemble Airfield; this is currently in use and therefore taking forward this scenario may result in the loss of regionally important infrastructure and a key location for employment.
- 3.20 In relation to the above, the delivery of new settlements or strategic sites is likely to have long lead-in times from conception given the complexities associated with identifying suitable locations, developing the design, delivering infrastructure, and gaining the necessary consents for approval. Hence, some of the housing growth through these scenarios is likely to come forward towards the latter half of the plan period. Nevertheless, some of the strategic sites are of a scale which could accommodate additional growth beyond the plan period too, and in this respect, they represent longer term opportunities for growth.
- 3.21 In conclusion, scenarios which could facilitate comparatively higher housing growth, including at the most sustainable locations across the district (i.e. the Main Service Centres and Principal Settlements) (**Scenarios 5, 6 and 7**), are ranked most favourably. **Scenario 6** is the only scenario which exceeds the local housing need figure, and therefore this is the only scenario where **major positive effects** are anticipated. **Minor positive effects** are noted under Scenarios 5 and 7 which fall short of meeting the local housing need figure.
- 3.22 Dispersing housing across the district may result in disproportionate growth in settlements, and this may not necessarily meet emerging housing needs (i.e., by delivering too few homes in the most sustainable locations). In addition, **Scenarios 1 and 2** are less likely to deliver a range of housing types and tenures (including affordable homes) as they do not include strategic sites. As such, these options are ranked least favourably and are anticipated to lead to **major negative effects** by falling significantly short of the local housing need figure.
- 3.23 **Scenarios 3 and 4** are considered to perform slightly more favourably as they focus growth within the Main Service Centres and Principal Settlements whilst also delivering more homes. However, these scenarios, given they comprise more focused distributions of growth, may limit opportunities to deliver a proportion of growth within Rural Settlements to support their vitality and reduce inequalities. Overall, **minor negative effects** are anticipated under these scenarios.

Economy and employment

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|------------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Economy and employment | Rank | =6 | =6 | =4 | =4 | 1 | 2 | 3 |
| | Likely significant effect? | -- | -- | - | - | ++ | ++ | ++ |

- 3.24 Key challenges to supporting economic vitality in the district include (but are not limited to) the loss of employment land to housing; the under-delivery of employment land in mixed-use development; the need for flexible workspace; and the need to support the expansion of the green economy and economic diversification. Considering these challenges, scenarios which would help to address some of the key challenges in the district perform more favourably with respect to this IIA theme. This is considered below.
- 3.25 Many of the settlements in the district are within the boundaries of the Cotswolds National Landscape. Growth through any of the scenarios has the potential to strengthen the potential benefits of tourism for local communities, including in terms of employment and economic activities, and facilities such as shops which rely on the visitor economy. Potential benefits are considered more pronounced through scenarios which would facilitate a higher level of growth in the Main Service Centres and Principal Settlements (**Scenarios 5, 6 and 7**), which serve as gateways to accessing the National Landscape. These settlements also offer the greatest variety of employment opportunities in the district. In this respect, focusing a higher level of growth in these locations may help to support a diverse mix of uses which will help to strengthen the local economy and support the resilience of local centres.
- 3.26 By delivering several strategic extensions, **Scenarios 5, 6 and 7** (and **Scenarios 3 and 4**, but to a lesser degree) provide the opportunity to create significant new infrastructure investment, supporting the local economy through facilitating new jobs. Strategic extensions may make use of and improve existing services, facilities, employment opportunities, and transport connectivity within a Main Service Centre or Principal Settlement, further supporting economic vitality. In addition, strategic scale development may help to support the regeneration of town centre environments and the resilience of the local economy (particularly important for Cirencester). This will enable a proportion of developer contributions to support the delivery of new services, facilities, and cultural opportunities due to increased use of town centre environments.
- 3.27 By focusing growth around transport nodes, **Scenario 4** would encourage additional growth in locations where there are good current, and potential future, opportunities to connect to bus and rail networks. This may include locations within proximity to the A429 corridor (e.g. Cirencester, Kemble, Northleach, Bourton-on-the-Water, Stow-on-the-Wold, and Moreton-in-Marsh), and in locations which are connected to the rail network (Moreton-in-Marsh and Kemble). This will help to ensure that people have access to employment and economic opportunities at key locations across the district.
- 3.28 In conclusion, **Scenarios 5, 6 and 7** will help support the vitality of town and village centres as places that support a diversity of activities and uses and

reduce the need to travel to access economic opportunities in the district. This is particularly important for Cirencester given its role and function as the key urban community in the district. However, as noted above, these scenarios have some key differences. Of relevance to this IIA theme, **Scenario 7** delivers an additional new settlement at Cotswold Airport, near Kemble; this is currently in use and therefore taking forward this scenario may result in the loss of a key employment site. In addition, whilst **Scenario 6** is most likely to support the growth of the local economy by increasing the size and variety of the local workforce, significant growth within the Cotswolds National Landscape may detract from the special qualities which encourage residents and visitors to the area. As such, growth under this scenario could adversely impact the local economy. These considerations are reflected in the ranking of these scenarios. Nevertheless, overall, all three scenarios are still considered likely to lead to **major positive effects**.

- 3.29 **Scenarios 1 and 2** would deliver the lowest level of growth within the key settlements in the district. Supporting the economic vitality and resilience of these communities (many of which are in the Cotswolds National Landscape and are important visitor destinations) is identified as a priority during the plan period. Hence, these scenarios are ranked least favourably and are considered likely to lead to **major negative effects**. It is considered that **Scenarios 3 and 4** perform slightly more favourably by delivering a higher level of growth and focusing growth within the Main Service Centres and Principal Settlements, with only **minor negative effects** anticipated. It is also noted that all four scenarios could also limit opportunities to improve accessibility to employment opportunities in more rural locations, due to the lower level of growth proposed, which may exacerbate economic inequalities.

Equalities

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Equalities | Rank | =6 | =6 | =4 | =4 | =2 | 1 | =2 |
| | Likely significant effect? | - | - | + | + | ++ | ++ | ++ |

- 3.30 Overall deprivation according to the Index of Multiple Deprivation (IMD) (2019) is relatively low across the district, reflecting the affluence associated with the Cotswolds. Nevertheless, pockets of deprivation exist; two of the LSOAs in Cirencester (Cotswold 007D and 008B) are amongst the 40% most deprived neighbourhoods in the country. When looking at the 'barriers to housing and services' domain in isolation the picture is markedly different with the district overall being highly deprived. The more rural parts of the district are particularly deprived in this respect. On this basis, the scenarios which would support both wider distributions and higher growth (including strategic sites) (**Scenarios 5, 6 and 7**) are more likely to address the current poor access to housing and services experienced across the district.
- 3.31 Access to services and facilities, amenities such as open green space, employment opportunities, and educational facilities is a key determinant of residents' quality of life. This is especially important for disabled people and the elderly, and it is recognised that the district has a large and growing elderly population. Therefore, focusing growth within proximity to the Main

- Service Centres and Principal Settlements (as proposed through **Scenario 3**) will help to promote access for all, including those with and without shared protected characteristics. However, it is noted that this scenario does not deliver any growth in the Non-Principal Settlements, meaning that the benefits associated with growth are not equally distributed across the settlements in the district under these scenarios.
- 3.32 Focusing growth around transport nodes (**Scenario 4**) will ensure that future residents have good access to services and facilities and connectivity to local public transport networks. However, this may have unintended consequences in terms of rural connectivity and accessibility, widening inequalities in this respect by exacerbating social and community isolation. This is given that the Non-Principal Settlements in the district (which would receive a higher level of growth through **Scenarios 1, 2, 5, 6 and 7**) are generally relatively poorly served by public transport and have limited services and facilities and employment opportunities. Nevertheless, it is noted that Scenario 4 delivers some growth in the Non-Principal Settlements of Down Ampney, Longborough, and Preston.
- 3.33 **Scenarios 1, 2, 5, 6 and 7** seek to identify village ‘clusters’ by considering the ‘collective’ opportunities and advantages presented by settlements rather than treating each in isolation. This is likely to bring forward some development opportunities in locations where this has not previously been possible. In doing so, these scenarios have the potential to increase community cohesion and inclusivity in these settlements.
- 3.34 The potential benefits of delivering growth via several strategic site options are significantly influenced by several factors. For example, whether new development is of high quality and sustainably design; is appropriately located; provides attractive and inclusive environments; and helps to support positive health outcomes which help to address inequalities. Therefore, a degree of uncertainty is associated with **Scenarios 3, 4 5, 6 and 7** with respect to this IIA theme.
- 3.35 In conclusion, scenarios which deliver growth within the most sustainable locations in the district in terms of accessibility to services and facilities and connectivity to public transport networks have the greatest potential to support residents’ quality of life, including groups who have protected characteristics. However, it is important that more rural locations also receive growth and the benefits associated with it. Hence, **Scenarios 5, 6 and 7** are ranked most favourably with **major positive effects** anticipated at this stage. Scenario 6 is ranked first as it is the only scenario which meets the local housing need and is therefore also likely to bring the most benefits with respect to this IIA theme. However, it is recognised that under the higher growth scenarios some of the settlements would increase substantially in size (e.g. Chipping Campden would quadruple in size under Scenario 6). This could increase inequalities by putting pressure on the capacity of existing infrastructure to accommodate growth.
- 3.36 As **Scenarios 3 and 4** deliver a significantly lower level of growth compared to Scenarios 5, 6 and 7, only **minor positive effects** are anticipated under these scenarios. However, it is noted that these scenarios would likely put less pressure on the capacity of existing infrastructure, and they perform well in this respect. **Minor negative effects** are predicted under **Scenarios 1**

and 2 as they deliver the lowest level of growth and are therefore least likely to tackle issues of inequality across the district.

Transport and air quality

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|---------------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Transport and air quality | Rank | =6 | =6 | 2 | 1 | =3 | =3 | =3 |
| | Likely significant effect? | - | - | + | ++ | +/- | +/- | +/- |

- 3.37 Focusing growth within the Main Service Centres and Principal Settlements (as proposed through **Scenario 3**) will help to facilitate new homes in the most sustainable locations in terms of access and connectivity to public transport networks in the district. In doing so, residents will be less likely to use their car, helping to reduce congestion and associated emissions. This has the potential to deliver medium to longer term benefits for transport and air quality during the plan period. Potential benefits of delivering growth in the most sustainable locations are considered to be more pronounced through **Scenario 4** which seeks to focus growth around transport nodes.
- 3.38 Focusing growth in the Main Service Centres and Principal Settlements and around transport nodes may have unintended consequences in terms of rural connectivity and accessibility, reducing growth in the Non-Principal Settlements and Rural Settlements. For example, bus services across most of the district, particularly in rural locations, are sporadic or non-existent. It is recognised that the ability of smaller settlements to absorb additional growth in a sustainable manner is more limited because people tend to rely more on their cars to access services and facilities and employment opportunities, and other travel options are typically more limited. However, delivering a proportion of new development in the Non-Principal Settlements (as proposed through **Scenarios 1, 2, 5, 6 and 7**) may help to facilitate improvements in these locations.
- 3.39 **Scenarios 5, 6 and 7** deliver a new settlement in Driffield (located to the southeast of Cirencester) and Cotswold Airport, near Kemble (Scenario 7 only). Driffield is poorly served by public transport, with only one bus service to Cirencester three days a week. Conversely, Kemble has a train station (with direct trains to London Paddington) and is served by several bus services which connect it with surrounding larger settlements, including Cirencester. Nevertheless, the delivery of new settlement(s) may facilitate opportunities to create significant new infrastructure investment (including public transport).
- 3.40 In conclusion, focusing growth within Main Service Centres and Principal Settlements (as proposed through **Scenarios 3 and 4**) will help to facilitate new homes in the most sustainable locations in terms of access and connectivity to public transport networks in the district. This will likely reduce congestion and associated emissions, which negatively impact human health. **Scenario 4** performs particularly well by focusing growth in locations with access to the rail network (i.e., Moreton-in-Marsh and Kemble) and along sustainable transport corridors (such as the A429 corridor). Hence,

major positive effects are predicted under Scenario 4, whilst **minor positive effects** are anticipated under Scenario 3.

- 3.41 Whilst **Scenarios 5, 6 and 7** direct a significant level of growth to the Main Service Centres and Principal Settlements, they also direct a significant level of growth to the less sustainable Non-Principal Settlements and Rural Settlements. Nevertheless, by delivering new settlement(s) and strategic extensions, these scenarios have the greatest potential to deliver significant new transport infrastructure, including public transport and active travel infrastructure. Due to this, these scenarios are also ranked highly. However, **mixed effects** are noted as growth in the Non-Principal Settlements and Rural Settlements will inevitably lead to an increase in the number of cars on local roads.
- 3.42 **Scenarios 1 and 2** will deliver comparatively fewer homes in the most accessible and sustainable locations in the district. However, by delivering the lowest level of growth, these scenarios will likely result in the lowest number of additional cars on the local road network, thereby contributing less to traffic and congestion. Nevertheless, these scenarios are ranked last and are considered likely to lead to **minor negative effects**. This is because the level of growth proposed is unlikely to deliver significant transport infrastructure improvements, which are largely associated with strategic sites.

Climate change mitigation

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|---------------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Climate change mitigation | Rank | =6 | =6 | =1 | =1 | =3 | =3 | =3 |
| | Likely significant effect? | - | - | + | + | +/- | +/- | +/- |

- 3.43 The Council has declared a climate change emergency and is committed to making its Local Plan "Green to the Core", on top of the legal and moral duty to address climate change. In this context, scenarios which would help support the transition to net-zero and improve climate resilience perform more favourably with respect to this theme. This is considered below.
- 3.44 With respect to climate change mitigation, road transport is an increasingly significant contributor to emissions in the district. Delivering proportionately higher levels of growth within the Main Service Centres (as proposed through **Scenario 3**) would ensure growth is directed to locations with established public transport networks. These settlements also tend to have the widest range of services and facilities, amenities, employment opportunities, and educational facilities, which would help to limit the need for residents to travel further afield to access these. This would support a limitation of emissions, positively contributing to climate change mitigation efforts.
- 3.45 By focusing growth around transport nodes, **Scenario 4** would also help to encourage 'modal shift' away from the use of the private car and towards increased use of public transport. This option would focus growth within proximity to the rail network and along the A429 corridor, where current and

potential future opportunities to access public transport are more readily achievable. Emissions from transport would likely be lowest through this scenario.

- 3.46 Dispersing growth around the district through **Scenarios 1 and 2** would potentially result in a higher percentage of new homes and employment land being delivered in less sustainable locations with respect to accessibility and connectivity to public transport networks. The ability of Non-Principal Settlements to absorb additional growth in a sustainable manner is more limited because people tend to rely more on their cars to access services and employment opportunities and other travel options are typically limited.
- 3.47 By delivering new settlement(s) and strategic extensions, **Scenarios 3, 4, 5, 6 and 7** have the greatest potential to deliver low carbon developments as well as new transport infrastructure, including public transport and active travel. This would help minimise the carbon emissions associated with new development. Whilst these scenarios have the potential to proactively respond to the climate crisis, this is largely dependent on the design of development and inclusion of specific measures such as on-site renewable energy generation, energy efficient building design, and greywater recycling.
- 3.48 In conclusion, **Scenarios 3 and 4** would help to limit reliance on cars for undertaking day-to-day activities within the district and therefore reduce transport related carbon emissions by offering more alternatives (public transport, walking and cycling) and good access to services and facilities. This would likely aid in the transition to a low carbon economy. It is noted that these scenarios also include some strategic extensions, which have the potential to deliver low-carbon developments due to their size. Hence, these scenarios are ranked highest and **minor positive effects** are anticipated.
- 3.49 The high growth scenarios (**Scenarios 5, 6 and 7**) are also ranked favourably as they are considered to have the greatest potential to deliver low-carbon and resilient developments through new settlement(s) and strategic extensions. However, it is recognised that these scenarios would ultimately lead to the largest increase in GHG emissions in the district. Nevertheless, **mixed effects** are noted at this stage.
- 3.50 Whilst the low growth scenarios (**Scenarios 1 and 2**) would result in the lowest increase in GHG emissions locally, these scenarios would not bring forward any of the benefits associated with strategic-scale development. Under these scenarios, there is greater potential for development to come forward in potentially unsustainable locations to make up for the shortfall in housing. Due to this, **minor negative effects** are anticipated under these scenarios.

Climate change adaptation

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|---------------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Climate change adaptation | Rank | =1 | =1 | =3 | =3 | =5 | 7 | =5 |
| | Likely significant effect? | 0 | 0 | - | - | - | - | - |

- 3.51 New development areas have the potential to increase flood risk through factors such as changing surface and ground water flows; overloading existing inputs to the drainage and wastewater networks; or increasing the number of residents exposed to areas of existing flood risk. In terms of adapting to the effects of climate change, a development strategy which seeks to focus new homes and employment land in locations away from flood risk areas is an important consideration. Locations with potential sensitivities include:
- Flood risk issues within and/or surrounding the Main Service Centres include areas of Flood Zone 3a and 3b within Bourton-on-the-Water, Cirencester, Chipping Campden, Fairford, Lechlade, Northleach, Stow-on-the-Wold, and Tetbury.
 - Flood risk issues within and/or surrounding the Principal Settlements include areas of Flood Zone 3a and 3b within Andoversford, Blockley, Down Ampney, Kemble, Mickleton, Moreton-in-Marsh, and South Cerney.
- 3.52 Given the significant flood risks surrounding several of the Main Service Centres and Principal Settlements, dispersing growth across the district (as proposed through **Scenarios 1, 2, 5, 6 and 7**) may help to limit potential flood risk issues at these locations. However, it is noted that **Scenarios 1 and 2** would not deliver any strategic extensions, which have increased potential to incorporate flood mitigation measures through good design.
- 3.53 In relation to the above, proposals for larger development areas (as proposed through **Scenarios 3, 4, 5, 6 and 7**) may offer opportunities to incorporate green infrastructure and sustainable drainage through design. However, it is recognised that some of the strategic sites, particularly those located in the National Landscape (as proposed through Scenario 6), likely already contain green infrastructure. Therefore, the impacts of climate change, such as flooding, might be exacerbated if development is brought forward in these locations.
- 3.54 In conclusion, **Scenarios 1 and 2** are ranked highest as they deliver the lowest level of growth, which is dispersed across the district. This would minimise the likelihood of development overlapping with areas of increased flood risk. As such, no significant effects are anticipated under these scenarios. This is followed by **Scenarios 3 and 4**, which deliver a slightly higher level of growth. However, avoiding areas of flood risk may be more challenging under these scenarios due to their focused approach. As such, **minor negative effects** are predicted under these scenarios.
- 3.55 It is recognised that **Scenarios 5, 6 and 7** are considered to have the greatest potential to deliver developments with climate resilience built-in to their design by delivering new settlement(s) and strategic extensions. However, these scenarios – by delivering the highest levels of growth – would ultimately deliver a higher proportion of development areas in locations which are at an increased risk of flooding. These scenarios are therefore ranked least favourably, with Scenario 6 ranked last as the highest growth scenario. However, due to the provisions made through national planning policy, only **minor negative effects** are noted at this stage.

Historic environment

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|----------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Historic environment | Rank | =3 | =3 | 1 | 2 | =5 | 7 | =5 |
| | Likely significant effect? | - | - | - | - | -- | -- | -- |

- 3.56 The district has a rich heritage resource, recognised by the wealth of designated heritage assets and areas. For example, many settlements have at least one designated conservation area and contain several scheduled monuments and listed buildings. Additionally, many are within proximity to a registered historic park and garden (including five of the Main Service Centres and one of the Principal Settlements).
- 3.57 Cirencester, the largest Main Service Centre in the district, has a rich heritage recognised through its various heritage designations of national and local significance. This includes over 170 listed buildings, nine scheduled monuments, four conservation areas, and Cirencester Park and Country House Historic Park and Garden. The significance of Cirencester in Roman times is recognisable through its Amphitheatre (the second largest in the UK) and walls (which circle the town).
- 3.58 Given the concentration of heritage assets and areas within the Main Service Centres and Principal Settlements, potential adverse impacts to the historic environment are likely if new development is brought forward in these areas (as proposed through all scenarios, but particularly **Scenarios 5, 6 and 7**). Potential impacts are perhaps more pronounced through **Scenario 6** which would focus a greater proportion of growth within Cirencester. This could lead to adverse impacts on the wider historic character of the town.
- 3.59 The heritage and cultural significance of the district's Non-Principal Settlements and Rural Settlements is likely to be significantly influenced by their location within the Cotswold National Landscape (which covers approximately 80% of the district). In this respect, dispersing growth across the district (as proposed through **Scenarios 1, 2, 5, 6 and 7**) also has the potential to impact on the historic environment of the Non-Principal Settlements and Rural Settlements (which are closely associated with the international tourism value of these locations).
- 3.60 With respect to **Scenarios 5, 6 and 7**, by concentrating growth at potential new settlement(s), this may help to ensure that new housing is located away from the most significantly constrained areas in terms of heritage (i.e. away from existing settlements). However, it is noted that both land near Driffield and Cotswold Airport, near Kemble, contain several designated heritage assets and therefore delivering new settlements in these locations comes with its own challenges from a heritage standpoint. In addition, the delivery of new settlements does not limit the potential for impacts on below-ground archaeological assets at these locations. This is in addition to potential impacts on the setting of heritage assets in and around nearby settlements.
- 3.61 It is important to recognise that the application of sensitive design through new development areas has the potential to positively contribute to the historic significance of these settlements. For example, the design of new

development areas (particularly larger or strategic-scale sites) may help to better reveal the heritage significance of key locations, which is an important contributor to the quality of the built-environment and the reasons why people choose to live within and visit the district. There may also be several brownfield sites within Main Service Centres and Principal Settlements which, in their current form, detract from the heritage significance of the settlement, and could therefore benefit from redevelopment which could help to rejuvenate these areas. This could include by incorporating sensitive architectural features which complement the heritage significance of these areas and their surrounding environment.

- 3.62 With a wealth of heritage assets and areas within the district, all scenarios are recognised for potential adverse effects to the historic environment. This is linked to the concentration of heritage assets and areas within the Main Service Centres, Principal Settlements, Non-Principal Settlements, and Rural Settlements. However, it is important to recognise that the application of sensitive design through new development areas has the potential to positively contribute to the historic significance of these settlements (for example, via enhancing the setting of nearby heritage assets). Nevertheless, consultation with Historic England is encouraged to ensure that development proposals seek to implement sensitive design which respects and enhances the setting of heritage assets and areas within the district.
- 3.63 Overall, **Scenarios 5, 6 and 7** are ranked least favourably as they deliver the highest level of growth across the widest areas. As such, potential adverse impacts on heritage assets are likely to be the most widespread under these scenarios. Scenario 6 is the least favourable as it delivers the highest level of growth within the historic and culturally significant Cotswolds National Landscape, and **significant negative effects** are anticipated under all three scenarios. This is followed by **Scenarios 1 and 2** – whilst these scenarios deliver the lowest level of growth, they still deliver growth across the Non-Principal Settlements which are particularly sensitive to growth in terms of potential impacts on the historic environment. However, only **minor negative effects** are anticipated. **Scenario 3** is ranked first as it does not deliver any growth in the Non-Principal Settlements, whilst **Scenario 4** is ranked second as it only delivers limited growth in the Non-Principal Settlements. However, **minor negative effects** are still considered likely as these scenarios still deliver some strategic extensions which could lead to impacts on nearby heritage assets if not designed appropriately.
- 3.64 It is anticipated that the stipulations within local design guidance²² will guide new development proposals that may come forward during the plan period to respect their surroundings. This will benefit the historic environment by ensuring new development does not detract from the historic character of the area or the setting of heritage features, whilst also encouraging designs and layouts which reinforce the significance of the historic environment.

²² Cotswold District Council (various dates): [Local Design Guidance](#)

Landscape

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|-----------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Landscape | Rank | =1 | =1 | =3 | =3 | 5 | 7 | 6 |
| | Likely significant effect? | +/- | +/- | +/- | +/- | - | -- | -- |

- 3.65 Covering approximately 80% of the district, the Cotswolds National Landscape is a significant constraint to growth. There are also six further Special Landscape Areas in the district, which protect locally significant and valued landscapes that have intrinsic qualities or character. Although not nationally designated, in some cases they provide important settings and effective buffers for the National Landscape. Considering this, it is recognised that growth through all scenarios has the potential to impact the integrity of the National Landscape and Special Landscape Areas (SLAs). However, impacts are dependent on the scale, design and layout of new development areas which come forward.
- 3.66 The following settlements – which are all proposed to be Principal Settlements – are wholly located within the National Landscape: Andoversford, Blockley, Bourton-on-the-Water, Chipping Campden, Northleach, Stow-on-the-Wold, Tetbury, and Upper Rissington.
- 3.67 Settlements which are partially within the National Landscape, or are in the setting of the National Landscape, include:
- Cirencester (proposed Principal Settlement) – northern half of the town, and land to the west of the town, with further land to the north, including a designated SLA.
 - Kemble (proposed Principal Settlement) – most of the land surrounding the settlement is within a Special Landscape Area, with land further to the north within the National Landscape, although land to the southwest is outside of the boundaries.
 - Mickleton (proposed Principal Settlement) – land to the south of the settlement is within the National Landscape, with land to the west, whilst outside of the National Landscape, designated as a SLA.
 - Moreton-in-Marsh (proposed Principal Settlement) – land to the west of the settlement is within the National Landscape, with land to the north and south, whilst outside of the National Landscape, designated as a SLA.
 - Willersey (proposed Non-Principal Settlement) – southern half of the settlement is within the National Landscape, with the northern half of the settlement outside of the National Landscape.
- 3.68 Whilst Fairford (proposed Principal Settlement) is outside the National Landscape, there is land designated as a SLA to the north.
- 3.69 Potential impacts on the National Landscape are likely to be more pronounced through **Scenario 6** which would deliver major development within the National Landscape. This includes a strategic extension to the east of Chipping Campden, and north and south of North Cerney. This is in addition to non-strategic sites in the National Landscape (e.g. Stow-on-the-

Wold, Tetbury, Northleach, and Chipping Campden). The in-combination effects of this would likely lead to significant adverse effects due to the overall increase in size of these settlements.

- 3.70 A number of the Main Service Centres have land available outside of the National Landscape. This is particularly evident for Moreton-in-Marsh and Kemble (although development opportunities are perhaps still constrained by the sensitive landscape that surrounds both settlements - i.e., the SLAs). Despite this, Main Service Centres are more likely to be able to accommodate higher levels of growth (as proposed through **Scenarios 4, 5, 6 and 7**), in landscape character terms, in comparison to the Non-Principal Settlements. This is given that these settlements may have a relatively high landscape sensitivity considering 1) their location within the National Landscape, and 2) their rural character and countryside setting. Additionally, by delivering a proportionately higher level of growth within the Non-Principal Settlements (as proposed through **Scenarios 1 and 2**), this may lead to a perception of loss of identity and distinctiveness between different settlements if growth is delivered via village 'clusters'. Nevertheless, Scenario 2 might help to ensure that development in rural locations is sensitive to its landscape context and setting.
- 3.71 **Scenarios 1 and 2** do not deliver any new settlements or strategic extensions and are therefore less likely to lead to adverse impacts on landscape and townscape / villagescape character. **Scenarios 3, 4 and 5** only deliver strategic extensions (and a new settlement in the case of Scenario 5) outside of the Cotswolds National Landscape. This will reduce potential adverse impacts on the National Landscape. Conversely, under **Scenario 6** – which is the only scenario which meets the local housing need figure – several strategic sites within the National Landscape are included, as well as all the non-strategic sites within the National Landscape. Hence, this scenario could be considered the most constrained from a landscape standpoint.
- 3.72 For **Scenario 7**, there is less of a focus on sites within the National Landscape; instead, some of the strategic sites deliver a higher level of growth. This scenario also delivers a new settlement at Cotswold Airport, near Kemble, which is considered 'unsuitable' for growth, reflecting the SHELAA findings. This conclusion was reached because the airport is strategically important regional infrastructure that is supportive of the aerospace industry. In addition, the site is within a prominent location that is visible from many places, including the Thames Path national trail, public roads and footpaths, and villages both within the National Landscape and the Kemble / Ewen Special Landscape Area. Whilst the site is categorised as brownfield, it comprises large areas of open green space around the runways, hangars and associated airport buildings. Hence, there could also be adverse landscape implications through this scenario.
- 3.73 In conclusion, **Scenarios 1, 2, 3, 4 and 5** are likely to facilitate the greatest proportion of new homes in locations outside of the National Landscape and are therefore ranked most favourably. However, it is noted that **Scenarios 3, 4 and 5** would deliver some new development through strategic extensions. Whilst these may offer greater flexibility in terms of design, through the incorporation of natural landscaping features and enhancements, this may lead to more significant concentrated effects on landscape character locally.

In addition, **Scenario 5** includes a new settlement near Driffield which has the potential to significantly change the landscape character in this location. This is reflected in the ranking of these scenarios, with **minor negative effects** considered likely under Scenario 5.

- 3.74 **Scenarios 6 and 7** are ranked least favourably as they deliver the highest and second highest level of growth respectfully. Under **Scenario 6**, this includes several strategic sites within the National Landscape, as well as all the non-strategic sites within the National Landscape. Under **Scenario 7**, this includes a higher level of growth at a couple of the strategic sites, as well as a new settlement at Cotswold Airport, near Kemble, which is assessed to be ‘unsuitable’ by the Council. Due to this, **major negative effects** are anticipated under both scenarios. Scenario 6 ranked last due to the potential for this scenario to significantly impact the setting and significance of the National Landscape.
- 3.75 It is recognised that growth through all scenarios has the potential to impact the integrity of the Cotswolds National Landscape and Special Landscape Areas within the district. The various local design guidance documents prepared by the Council outlines that it is important that new development, whilst respecting local character, develops a sense of place alongside individuality of design and identity of character, for new development areas. In addition, the Cotswolds National Landscape Management Plan²³ contains a comprehensive summary of the key issues facing the Cotswolds National Landscape, and the management policies and actions needed to conserve and enhance this special place. The emerging development management policies in the Local Plan Review should aim to address the key challenges / threats / opportunities for the National Landscape to maximise the potential cumulative and in-combination effects from additional growth.

Green infrastructure and natural capital

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|--|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Green infrastructure and natural capital | Rank | =6 | =6 | =1 | =1 | =3 | 5 | =3 |
| | Likely significant effect? | - | - | + | + | +/- | - | +/- |

- 3.76 Attractive and wildlife-rich green and blue spaces support the quality of neighbourhoods, often supporting a high-quality public realm and delivering wider benefits with respect to climate resilience and health and wellbeing. For example, green infrastructure enhancements have the potential to deliver a range of ecosystem services which will support land, soil, and water resources. These include soil formation; flood and erosion protection; and water quality regulation. The provision of green infrastructure within new developments can also support flood risk management through the provision of permeable surfaces and introduction of sustainable drainage systems.
- 3.77 In the context of the above, scenarios which would support wide distributions, and which would focus growth at new settlement(s) and

²³ Cotswolds National Landscape Board (2025): [Cotswolds National Landscape Management Plan](#)

strategic extensions (**Scenarios 3, 4, 5, 6 and 7**) may increase the potential to deliver multi-functional and interconnected green and blue infrastructure opportunities through design. However, it is also recognised that the scale of growth proposed under these scenarios is also likely to lead to the greatest loss of greenfield land, including access to the countryside. Still, it is recognised that not all this greenfield land may be accessible.

- 3.78 A more focused distribution of growth within Main Service Centres and Principal Settlements (**Scenarios 3 and 4**) may support opportunities to regenerate and enhance the environmental quality at key locations in the district; improve active travel links; and provide wider health benefits which complement the aims and objectives in the Council's Green Infrastructure Strategy²⁴. Notably, the Strategy considers green infrastructure (GI) actions that could be delivered at a settlement level, focusing on the larger Principal Settlements where development is most likely to come forward.
- 3.79 Cotswold Lakes (formerly known as Cotswold Water Park) is an important green and blue infrastructure asset within the district. Whilst the opportunities for delivering multi-functional green and blue infrastructure networks are perhaps more readily achievable through strategic sites, it will be important for new development areas to link with and enhance existing assets in the district where possible. **Scenarios 5, 6 and 7** deliver new settlement(s) near Driffild and Cotswold Airport, near Kemble (Scenario 7 only), which are both in proximity to the Cotswold Water Park. Hence, the delivery of new settlements in these locations may offer opportunities to expand and enhance established green and blue infrastructure networks at key locations.
- 3.80 Contrastingly, strategic scale development may adversely impact existing green and blue infrastructure networks by reducing their capacity to accommodate additional growth and visitors to these spaces. Impacts are likely to be more pronounced through **Scenario 6** due to the increased level of growth proposed within the Cotswolds National Landscape. The Management Plan highlights the need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. Such a nature recovery network is not only good for wildlife but also provides a range of ecosystem services. These ecosystem services are critically important to the wellbeing and economy of people living in and around the Cotswolds and beyond. Impacts associated with new settlements are ultimately influenced by the design and layout of development.
- 3.81 The potential for **Scenarios 1 and 2** to support opportunities for multi-functional green and blue infrastructure networks is limited. This is given that strategic scale growth, which could deliver significant green and blue infrastructure provision, is not proposed through these scenarios. However, it is recognised that green infrastructure benefits are likely to be required as a condition for any new development areas which come forward, particularly for proposals within the Cotswolds National Landscape.
- 3.82 In conclusion, **Scenarios 3 and 4** are considered to perform most favourably as they focus growth within the Principal Settlements, which are a focus of GI actions within the Council's Green Infrastructure Strategy. These

²⁴ Cotswold District Council (2023): [Green Infrastructure Strategy](#)

scenarios also deliver a lower level of growth within the Non-Principal Settlements and Rural Settlements which are more sensitive to development, particularly those settlements within the Cotswolds National Landscape. Moreover, these scenarios deliver a few strategic sites, which often have the greatest potential to integrate GI. Potential impacts will be dependent on the design of new development areas, including the extent to which schemes can link and expand existing green infrastructure networks at these locations. **Minor positive effects** are considered likely at this stage.

- 3.83 New settlements and strategic extensions offer the greatest potential to deliver multi-functional green and blue infrastructure networks, and therefore numerous natural capital enhancements can be achieved through this type of development. However, it is also noted that this type of development will lead to the greatest loss of greenfield land, including countryside (although it is noted that not all areas of countryside are accessible). As such, **Scenarios 5 and 7** are considered likely to lead to **mixed effects**, whilst **Scenario 6** is anticipated to lead to **minor negative effects**. This is because this scenario delivers the highest level of growth within the National Landscape, which is the most valuable natural capital asset in the district. In addition, the high level of growth proposed through this scenario may make it challenging to balance housing / employment growth alongside green infrastructure delivery / enhancements.
- 3.84 Reflecting that non-strategic scale development is less likely to support opportunities for multi-functional green and blue infrastructure networks, **Scenarios 1 and 2** are considered likely to lead to minor negative effects. However, given these scenarios deliver the lowest level of growth, they are less likely to result in the loss of existing green infrastructure. Nevertheless, these scenarios are still ranked least favourably.

Biodiversity

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|--------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Biodiversity | Rank | =1 | =1 | =1 | =1 | =5 | =5 | =5 |
| | Likely significant effect? | +/- | +/- | +/- | +/- | +/- | +/- | +/- |

- 3.85 In July 2020 the Council declared an ecological emergency and approved an Ecological Emergency Action Plan. As such, scenarios which support the protection and enhancement of biodiversity across the district perform more favourably with respect to this theme. This is considered below.
- 3.86 There are no internationally designated sites for biodiversity within the district; the nearest sites are located directly to the south (North Meadow and Clattinger Farm Special Area of Conservation (SAC)) and the west (Cotswold Beechwoods SAC and Rodborough Common SAC). In addition, the Severn Estuary Special Protection Area (SPA) / Ramsar site is located approximately 20km to the west of the district (at its nearest point). It is currently not possible to distinguish between the scenarios with respect to potential impacts to the integrity of these sites.
- 3.87 In relation to the above, a Habitats Regulations Assessment (HRA) is being undertaken parallel to the IIA. The primary aim of HRA is to ensure the

protection of sites that host habitats and species of European importance, exploring the likely significant effects of Local Plan Review proposals on European sites. This process is set out in Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') and the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). Irrespective of the preferred development strategy taken forward, it is anticipated that the Local Plan Review will appropriately incorporate any mitigation and/or enhancement measures for future development proposals as recommended through the HRA.

- 3.88 With respect to nationally designated sites, there are Special Sites of Scientific Interest (SSSIs) located within proximity to four of the Main Service Centres (Bourton-on-the-Water, Fairford, Lechlade, and Tetbury) and two of the Principal Settlements (Kemble and South Cerney). Therefore, growth in these locations will likely require consultation with Natural England to determine whether new development areas will have any significant impacts to the integrity of these sites. Scenarios which deliver a higher level of growth in these locations (**Scenarios 5, 6 and 7**) are therefore considered less favourable with respect to potential adverse impacts to nationally designated sites.
- 3.89 Lower, more dispersed growth across the district (**Scenarios 1 and 2**) may limit opportunities to deliver coordinated schemes at locations which have the greatest potential to deliver biodiversity net gain (BNG). For example, many of the Non-Principal Settlements are within the Cotswolds National Landscape, where opportunities for significant growth are limited. This may reduce the viability of delivering significant ecological enhancements within the district. However, it is recognised that the requirement to deliver at least 10% BNG on sites, embedded by the Environment Act 2021, will help mitigate potential adverse effects and facilitate enhancements to ecological networks.
- 3.90 In the Cotswold context, many species of conservation interest in the district are separated by large distances from other patches of suitable habitat which exceed their normal dispersion capabilities. Creating a more inter-connected network of habitats allows species to expand their range, counteracting the ongoing trend for habitat fragmentation and adapting to the threats of climate change. In this respect, proposals for larger strategic sites (**Scenarios 5, 6 and 7**, and to a lesser extent **Scenarios 3 and 4**) have a greater potential to deliver net gains for nature across wider spatial areas. Specifically, larger sites have the potential to be designed to incorporate green infrastructure enhancements at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity objectives. Potential benefits are influenced by the extent to which new development areas are designed to deliver measurable, proportionate, and appropriate BNG in line with national and local policy.
- 3.91 In conclusion, proposals for strategic sites (as proposed through **Scenarios 5, 6 and 7**, and to a lesser extent **Scenarios 3 and 4**) have a greater potential to deliver BNG at a scale which can positively contribute to local networks, linking areas together and positively contributing to biodiversity objectives. However, it is also noted that a higher level of growth – as proposed through Scenarios 5, 6 and 7 – also presents challenges associated with balancing BNG / ecological enhancements with new

infrastructure and coordinating strategic scale enhancements. This is reflected in the rankings, with **mixed effects** anticipated at this stage.

- 3.92 By delivering lower, more dispersed growth across the district, and not including any strategic sites, **Scenarios 1 and 2** may limit opportunities to deliver coordinated schemes which have the greatest potential to deliver BNG. This may reduce the viability of delivering significant ecological enhancements within the district. However, it is also noted that by delivering the lowest level of growth, these scenarios may limit potential adverse impacts on biodiversity. Considering this, these scenarios are also considered likely to lead to **mixed effects**. Scenarios 1 and 2 are ranked equally to Scenarios 3 and 4 given their relative merits and constraints.

Land, soil and water resources

| IIA theme | | GS1 | GS2 | GS3 | GS4 | GS5 | GS6 | GS7 |
|--------------------------------|----------------------------|-----|-----|-----|-----|-----|-----|-----|
| Land, soil and water resources | Rank | =3 | =3 | =1 | =1 | =5 | =5 | =5 |
| | Likely significant effect? | 0 | 0 | 0 | 0 | +/- | - | +/- |

- 3.93 Most of the Main Service Centres and Principal Settlements are surrounded by 'best and most versatile' (BMV) land (i.e. Grades 1, 2 and Grade 3a). As such, all of the scenarios have the potential to lead to the loss of BMV land, but particularly **Scenarios 5, 6 and 7** which deliver a higher level of growth in these locations, including at large, strategic sites.
- 3.94 New settlement(s) are proposed through **Scenarios 5, 6 and 7**. One of the new settlements proposed under all three scenarios is located near Driffield, which is primarily underlain by Grade 3 agricultural land (with isolated areas of Grade 2 land to the east). However, it is not possible at this stage to determine whether this is Grade 3a (BMV) or Grade 3b (poorer quality). The other new settlement proposed under **Scenario 7** is located at Cotswold Airport, near Kemble, which is also underlain by Grade 3 agricultural land. However, it is noted that the airport is not in agricultural use and is technically a brownfield site. As such, these scenarios have the potential to lead to the loss of a significant area of BMV land (depending on whether or not they are underlain by Grade 3a land).
- 3.95 In addition to the above, it can be assumed that as the level of growth increases, so does the potential for scenarios to lead to a greater loss of agricultural / BMV land. Hence, **Scenario 6** could be considered the least-well performing in this respect. Nevertheless, it is recognised that this is the only scenario which exceeds the local housing need figure. Under the other scenarios, which do not meet the local housing need, speculative growth may come forward on more sensitive sites in light of the presumption in favour of development / tilted balance (the NPPF, Paragraph 11), which could include in potentially less favourable locations in terms of land and soil resources.
- 3.96 Water resources in the district include a network of main rivers, streams and brooks, many of which pass through or surround the Main Service Centres and Principal Settlements. For example:

- The River Churn passes through Cirencester, Siddington, and South Cerney.
 - The source of the River Thames is to the north of Kemble (at Thames Head), with the river itself passing to the northeast of the settlement.
 - The River Coln passes through Fairford, joining the River Thames at Lechlade. Cotswold Lakes (formerly known as Cotswold Water Park) – the UK’s largest marl lake system – covers most of the land between Fairford and Lechlade (south of the A417).
 - The River Thames and River Leach pass within proximity to Lechlade.
 - The River Windrush, River Eye, and River Dikler pass through Bourton-on-the-Water. The River Dikler also passes through land to the west of Stow-on-the-Wold.
 - The River Evenlode (a tributary of the River Thames) passes through Moreton-in-Marsh.
- 3.97 In this regard, a focus of growth within the Principal Settlements and Main Service Centres (as proposed through **Scenarios 3 and 4**) may adversely impact the water resources outlined above. However, proposals for larger strategic sites at these locations (which are primarily proposed through **Scenarios 5, 6 and 7**) may facilitate a greater potential for new development areas to incorporate green infrastructure buffers and other mitigation measures to limit (and manage effectively) potential run-off. This is however largely dependent on the design of new development areas. Lower, more dispersed growth throughout the district (as proposed through **Scenarios 1 and 2**) may deliver a greater proportion of new development away from the water resources discussed above.
- 3.98 With regard to water supply, much of the district is within the Thames Water catchment. This is designated by the Environment Agency as being “seriously water stressed”. This means there is likely to be an issue supplying water to these locations in the future.
- 3.99 On balance, focusing growth within the Main Service Centres and Principal Settlements (as proposed through **Scenarios 3 and 4**) is likely to protect the open countryside from higher levels of development. This will help support the capacity of the landscape to regulate soil and water quality. Hence, these scenarios are ranked most favourably.
- 3.100 **Scenarios 5, 6 and 7** will ultimately lead to the greatest loss of productive agricultural land. **Scenario 6** in particular would result in a significant loss of greenfield land within the open countryside and National Landscape. However, there is a greater potential for strategic sites – which are a focus of these scenarios – to incorporate green infrastructure buffers and other mitigation measures to limit (and manage effectively) potential run-off. On balance, Scenarios 5 and 7 are anticipated to lead to **mixed effects**, with **minor negative effects** noted under Scenario 6.
- 3.101 The design of new development areas is a key determinant on the success of the development strategy of the Local Plan Review with respect to this theme. For example, in addition to encouraging the most efficient use of land in the district, it will be essential for new development areas to maximise water and energy efficiency, protect water resources and water

quality, promote the use of renewable energy sources and sustainable construction methods, and reduce pollution and waste.

Conclusions and recommendations

- 3.102 **Scenarios 1 and 2** are considered likely to lead to major negative effects across the housing and economy and employment IIA themes, and minor negative effects across a further six IIA themes (healthy and vital communities; equalities; transport and air quality; climate change mitigation; historic environment; and green infrastructure and natural capital). This largely reflects the low level of growth proposed under these options, which means they cannot meet many of the needs of the district as they would do least to deliver the local housing need and associated infrastructure. This is in addition to the lack of strategic sites under these scenarios, which would likely reduce the likelihood of strategic-scale infrastructure being delivered under these scenarios. Mixed effects are noted under the biodiversity IIA theme and landscape IIA theme, whilst no significant effects are anticipated across the climate change adaptation and land, soil and water resources IIA themes. Scenarios 1 and 2 rank most favourably under two IIA themes (climate change adaptation and biodiversity).
- 3.103 **Scenarios 3 and 4** are considered likely to lead to major positive effects under the healthy and vital communities IIA theme, whilst Scenario 4 is also predicted to lead to major positive effects under the transport and air quality IIA theme (with minor positive effects predicted for this theme under Scenario 3). Minor positive effects are also anticipated under a further three IIA themes (equalities; climate change mitigation; and green infrastructure and natural capital) for both scenarios. This reflects the balanced nature of these scenarios; they deliver a higher level of growth than Scenarios 1 and 2, but focus this in the Main Service Centres and Principal Settlements which are the most sustainable locations in the district. Scenarios 3 and 4 also deliver a number of strategic sites and are therefore likely to bring forward many of the benefits associated with this type of development. However, minor negative effects are considered likely across four IIA themes (housing; economy and employment; climate change adaptation; and historic environment), reflecting that these scenarios do not meet the local housing need either. Mixed effects are noted under the biodiversity IIA theme and landscape IIA theme. These scenarios each rank most favourably across six IIA themes (healthy and vital communities; climate change mitigation; green infrastructure and natural capital; biodiversity; land, soil and water resources; transport and air quality for Scenario 4; and historic environment for Scenario 3).
- 3.104 **Scenarios 5, 6 and 7** are considered likely to lead to major positive effects across the economy and employment and equalities IIA themes, whilst Scenario 6 is also predicted to lead to major positive effects under the housing IIA theme (with minor positive effects noted for this theme under Scenarios 5 and 7 as they do not meet the local housing need figure). Mixed effects are noted across six IIA themes for Scenarios 5 and 7, and three IIA themes for Scenario 6. This reflects the various merits and constraints associated with these scenarios. Whilst they all come close to / exceed the local housing need figure, the level of growth proposed under these scenarios has greater potential to lead to adverse effects by contributing to

increased traffic and congestion; carbon emissions; and loss of open countryside, habitats, and productive agricultural land. All three scenarios are predicted to lead to minor negative effects under the climate change adaptation IIA theme. Scenario 6 is anticipated to lead to minor negative effects under a further three IIA themes (healthy and vital communities; green infrastructure and natural capital; and land, soil and water resources, whilst Scenario 5 under a further IIA theme (landscape). Major negative effects are noted across all three scenarios under the historic environment IIA theme, as well as the landscape IIA theme for Scenarios 6 and 7. This reflects that high growth is ultimately more likely to adversely impact the special qualities and setting of the Cotswolds National Landscape and numerous designated heritage assets across the district. Scenario 6 is ranked most favourably under two IIA themes (housing and equalities), whilst Scenario 5 is ranked most favourably under one IIA theme (economy and employment).

- 3.105 Reflecting the Council's current understanding of site deliverability and developability across the district, Scenario 6 is the only approach which would meet (and exceed) the government's standard method calculation for the number of homes needed in the district. **However, given this option is contrary to national planning policy on restricting major development within National Landscapes, Scenario 6 is not considered to be a viable option.** In this context, the Council will continue to consider how the Local Plan Review can meet development needs. For example, the Council is likely to consider whether opportunities exist to increase the density of new development areas and whether there are potential additional locations for strategic-scale growth within the identified 'Broad Zones' outside of the Cotswolds National Landscape. It is anticipated that the scenarios will be refined and updated as plan making evolves, with the findings presented and appraised in the IIA Report accompanying Regulation 19 consultation on the draft Local Plan Review.

Developing the preferred approach

- 3.106 In light of the appraisal findings presented above and upon considering the wider evidence base for the Local Plan Review and consultation responses received to date, the Council's preferred approach is **Scenario 5**.
- 3.107 The Preferred Options consultation document states:
- "The Council's preferred development strategy is scenario 5 as it builds on the current adopted strategy which has successfully delivered the development needs of the adopted Local Plan period until the introduction of the new housing target in December 2024. It ensures that the creation of new homes, employment and infrastructure is targeted in the most sustainable locations for development with the best services, facilities, employment opportunities and transport connectivity.*
- "On top of the existing strategy, scenario 5 also includes the creation of new settlement(s) and/or new strategic site(s). This ensures that the Council can evidence it has looked at all options to reach the housing target of 18,650 new dwellings. However, it is important to note that at this stage the figures are indicative.*

“The Council will maximise higher housing density development where possible, which may help to bridge the gap between the indicative capacity of scenario 5 and the delivery of the full housing target. However, this approach will be difficult to achieve in much of the district, where the landscape, conservation areas, and historic character of settlements place constraints on building height and layout. The housing density of 106 dwellings per hectare, which is needed from Scenario 5 to deliver the government’s full housing target, reflects a highly urbanised form of development, typically characterised by apartment blocks and flatted schemes with limited private outdoor space. This level of intensity is comparable to parts of inner London, such as Woodberry Down in Hackney and Stratford Halo in Newham, where high-rise living is common. Similar densities are also seen in the Temple Quay development in inner-city Bristol, which has been master-planned to accommodate densities exceeding 100 dwellings per hectare. While such densities may be appropriate in city centre contexts, they are generally out of character with the district. Such a density of development can also make it harder to deliver the required mix of housing types, which are important for meeting the needs of all residents.

“Scenario 5 is preferable over the other scenarios as it provides a housing land supply with the highest percentage of the government’s housing target (79%). It is unlikely that the other scenarios would be accepted as the Council’s strategy by an independent Inspector at the Examination in Public when Scenario 5 can deliver the most housing in a sustainable way (subject to further assessment).”

Part 3: What happens next?

4. Next steps for the IIA and plan making

- 4.1.1 This Interim IIA Report will accompany the *Preferred Options* consultation (Regulation 18) for a period of seven weeks from Friday 14th November 2025 and closing on Friday 2nd January (at midnight). The consultation will be hosted via the Council's dedicated website:

<https://your.cotswold.gov.uk>

- 4.1.2 Any comments received will be reviewed and then considered as part of the iterative plan-making and IIA process.
- 4.1.3 The representations received, as well as ongoing engagement and further evidence base work, including further IIA work, will be used to help shape the draft Local Plan before further consultation (at the Regulation 19 stage). An IIA Report will accompany the draft Local Plan for consultation at the Regulation 19 stage. Reflecting the Council's latest Local Development Scheme (2025-2028), Regulation 19 consultation is scheduled to take place in June 2026.

Appendix A Scoping information review (baseline and policy update)

A.1 Baseline information

Table A.1 Baseline information

| Data source | Changes since Scoping Report | Implications for the LPR | Implications for the IIA |
|--|---|---|--|
| Magic Map | Designations (e.g. heritage, landscape, and biodiversity) may have changed, this application can be used to check this. | Policy will need to consider any changes to European or national designations. | IIA to continually review the data and consider any changes to designations. |
| Census 2021 | New census data released. | Policy will need to consider any changes to population, economic activity, method of travel to work etc. | IIA to continually review the data and consider any changes to population, economic activity, method of travel to work etc. |
| Index of Multiple Deprivation 2025 | New Index of Multiple Deprivation (IMD) data released in October 2025. | Policy will need to consider any changes to deprivation. | IIA to continually review the data and consider any changes to deprivation. |
| AQMA interactive map | Some AQMAs may have been added, others may have been revoked. | Policy will need to consider any changes to AQMA designations. | IIA to continually review the data and consider any changes to AQMA designations. |
| Check the long term flood risk for an area in England | Flood risk issues across the district may have changed as the Environment Agency regularly update their mapping. | Policy will need to consider any changes to flood risk. | IIA to continually review the data and consider any changes to flood risk. |
| Heritage at Risk Register | Some heritage assets may have been added; others may have been revoked. | Policy will need to consider any changes to the Heritage at Risk Register. | IIA to continually review the data and consider any changes to the Heritage at Risk Register. |
| Assessment of Broad Strategic Development Locations (2025) | New evidence base. | Consideration of 'Broad Zones' for strategic-scale growth at locations outside of the Cotswolds National Landscape, which may impact the spatial strategy as plan making evolves. | Potential implications for reasonable alternatives to consider during the next stages of plan making and to be presented in the IIA Report accompanying Regulation 19 consultation on the Local Plan Review. |

| Data source | Changes since Scoping Report | Implications for the LPR | Implications for the IIA |
|---|-------------------------------------|--|--|
| Evidence Paper: Biodiversity | New evidence base. | Plan makers to consider new evidence to inform policy development. | The new evidence has been a useful source of reference during the IIA. |
| Evidence Paper: Design | New evidence base. | As above. | As above. |
| Evidence Paper: Economy and Employment | New evidence base. | As above. | As above. |
| Evidence Paper: Green Infrastructure | New evidence base. | As above. | As above. |
| Evidence Paper: Health, Social and Cultural Wellbeing | New evidence base. | As above. | As above. |
| Evidence Paper: Historic Environment | New evidence base. | As above. | As above. |
| Evidence Paper: Housing Affordability | New evidence base. | As above. | As above. |
| Evidence Paper: Housing Need Requirement and Land Supply and Delivery | New evidence base. | As above. | As above. |
| Evidence Paper: Infrastructure | New evidence base. | As above. | As above. |
| Evidence Paper: Landscape | New evidence base. | As above. | As above. |
| Evidence Paper: Natural Capital and Ecosystem Services | New evidence base. | As above. | As above. |
| Evidence Paper: Neighbourhood Development Plans | New evidence base. | As above. | As above. |
| Evidence Paper: Responding to the Climate Crisis | New evidence base. | As above. | As above. |
| Evidence Paper: Town Centres and Retail | New evidence base. | As above. | As above. |
| Evidence Paper: Sustainable Transport and Air Quality | New evidence base. | As above. | As above. |
| Evidence Paper: Tourism | New evidence base. | As above. | As above. |
| Evidence Paper: Water Quality, Quality Resources and Flooding | New evidence base. | As above. | As above. |

A.2 Policy context

Table A.2 Policy context

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|---|--|---|--|
| National | | | |
| National Planning Policy Framework (2025) | <p>Presumption in favour of sustainable development. Sustainable development to be delivered by:</p> <ul style="list-style-type: none"> • Building a strong, competitive economy. • Ensuring vitality of town centres. • Promoting sustainable transport. • Supporting high quality communications infrastructure. • Delivering a wide choice of high-quality homes. • Requiring good design. • Promoting healthy communities. • Meeting the challenge of climate change, flooding, and coastal change. • Conserving and enhancing the natural environment. • Conserving and enhancing the historic environment; and • Facilitating the use of sustainable materials. | National planning policy and revised housing need calculations. To be found sound on examination a Local Plan must be in conformity with it (unless material planning considerations indicate otherwise). | Sustainability appraisal should be an integral part of the plan preparation process (and the IIA). It should consider all the likely significant effects of the plan in environmental, economic and social terms. Failure to undertake SA or to take account of significant effects of policies or proposals may lead to the plan being found unsound. |
| National Planning Practice Guidance | <p>Detailed guidance to be read alongside the NPPF. Wide range of topics including the promotion of sustainable development:</p> <ul style="list-style-type: none"> • Air quality. • Climate change. • Conserving and enhancing the historic environment. • Flood risk. • Health and wellbeing. • Housing and economic development. • Natural environment. • Minerals. • Rural housing. • Open space. | Expands on policy, providing further detail on the production of Local Plans and the contents thereof. Frequently updated – important to keep track of changes. | As above. |

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|---|---|---|--|
| | <ul style="list-style-type: none"> • Transport. • Waste; and • Water supply, wastewater and water quality. | | |
| Planning Policy for Traveller Sites (2024) | <p>Government's aims include:</p> <ol style="list-style-type: none"> a. That local planning authorities should make their own assessment of need for the purposes of planning. b. To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites. c. To encourage local planning authorities to plan for sites over a reasonable timescale. d. That plan-making and decision-taking should protect Green Belt from inappropriate development. e. To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites. f. That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective. g. For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies. h. To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply. i. To reduce tensions between settled and traveller communities in plan-making and planning decisions. j. To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and k. For local planning authorities to have due regard to the protection of local amenity and local environment. | Develop policies that address requirements. Ensure needs assessment is up to date. | Sustainability objectives that relate to social inclusion and housing needs. |
| The Third National Adaptation Programme (NAP3) and the Fourth | <p>NAP3 explains the government's plans to adapt to climate change over the next 5 years from 2023 to 2028, including:</p> <ul style="list-style-type: none"> • Protecting the natural environment. | Develop policies that promote adaptation to climate change and deliver on the aspirations | Sustainability objectives that seek to tackle the climate |

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|--|---|--|--|
| Strategy for Climate Adaptation Reporting (2023) | <ul style="list-style-type: none"> Supporting business in adapting to climate change. Adapting infrastructure (for example, our electricity networks and railways). Protecting buildings and their surroundings (for example, from hotter temperatures). Protecting public health and communities; and Mitigating international impacts on the UK (for example, on food supplies imported from abroad). <p>The programme will focus on three themes:</p> <ul style="list-style-type: none"> Action – getting the policy framework right, leveraging major government programmes and private investments to build resilience. Information – driving improvement in our capability through better evidence and tools; and Coordination – taking an integrated approach through governance, engagement and coordinated policymaking. | of the Council's declaration of a climate emergency. | crisis and improve climate resilience. |
| Historic England Corporate Plan 2023-26 | <p>With a focus on six priority areas, Historic England's Corporate Plan provides a framework for their work as an organisation and helps maintain a collective approach to delivering on our long-term vision.</p> <p>The three areas of focus of the plan are:</p> <ul style="list-style-type: none"> Thriving Places – Historic England will collaborate with people and partners to secure vibrant and sustainable futures for historic places. Connected Communities – Historic England will collaborate with people and partners to secure vibrant and sustainable futures for historic places. They will bring communities together by discovering and celebrating local heritage, and by protecting the character of historic places; and Active Participation – Historic England will inspire and equip people to act in support of the places they care about. | Develop policy that protects the district's rich cultural heritage, including both designated and non-designated heritage assets and areas (and their settings). | Sustainability objectives that consider the contribution of historical assets and areas to the built environment, as well as benefits to community/social inclusion. |

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|--|--|--|--|
| Regional and sub-regional | | | |
| Cotswolds National Landscape Management Plan 2025-2030 | <p>The Management Plan is a statutory plan which sets out policies for the management of the Cotswold National Landscape (CNL). The CNL Board is the body responsible for preparing and publishing the Management Plan and for reviewing it at intervals of no more than five years. This is the sixth such document prepared by the Board. The Management Plan is a key mechanism for achieving the purposes of conserving and enhancing the natural beauty of the CNL and increasing the understanding and enjoyment of the CNL's special qualities. The Management Plan is the only plan to guide the management of the CNL as a whole.</p> <p>The Plan identifies three key issues:</p> <ul style="list-style-type: none"> • The climate emergency. • Nature's decline and the ecological crisis; and • Health and societal changes. <p>The plan goes on to define the special qualities of the CNL. These are the aspects of the area's natural beauty which make the area distinctive, and which are considered valuable, especially at a national scale. It is the impact of these key issues, amongst others, on the special qualities that has informed the development of the plan's outcomes and policies. The outcomes and policies are arranged under three overarching headings which reflect the National Landscape's purpose of designation (to conserve and enhance natural beauty) and the National Landscape Board's additional purpose (to increase understanding and enjoyment).</p> | <p>80% of Cotswold District is within the CNL. The Local Plan policies and Management Plan work together to ensure its conservation and enhancement and the maintenance of its key regional role in safeguarding the broader objectives of sustainability.</p> | <p>CNL designation cuts across several sustainability objectives including:</p> <p>Environmental:</p> <ul style="list-style-type: none"> • landscape protection. • biodiversity. <p>Social:</p> <ul style="list-style-type: none"> • Historic environment and cultural heritage. • Health and well-being. <p>Economic:</p> <ul style="list-style-type: none"> • Sustainable tourism |
| Gloucestershire's Economic Strategy (2024-2034) | <p>Gloucestershire's Economic Strategy (2024-2034) covers the next 10 years and introduces a new long-term vision for the county, Gloucestershire 2050, which sets out the plan to achieve greener and inclusive growth that all residents can contribute to and benefit from.</p> <p>'By 2050, Gloucestershire will be a hub for the UK's intelligence, security and cyber agencies. We will be a centre for world-leading</p> | <p>Develop policies that promote the economy.</p> | <p>Sustainability objectives relating to the economy.</p> |

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|--|---|---|--|
| | <p>sustainable businesses in the cutting-edge industries of digital communications, advanced manufacturing, agri-tech and green and nuclear energy, while preserving our rich cultural and natural heritage.</p> <p>Gloucestershire will build on its strength as a prominent location in western England with ease of access to regional hubs in, and beyond, the Western Gateway. We will sustain our unique mix of nationally important rural landscapes and vibrant urban centres by delivering a stronger, more sustainable economy that benefits the whole county.'</p> <p>The key priorities for the strategy are:</p> <ul style="list-style-type: none"> • Sustainable growth. • Inward investment. • Employment and skills; and • Business innovation and support. | | |
| Bristol Water Water Resources Management Plan 2024 | <p>The aim of a Water Resources Management Plan (WRMP) is to set out how water companies will maintain a balance between the demand for water and the supply of water whilst protecting the environment for at least 25 years.</p> <p>Provides context for future development linked to water management needs. Future policy should consider issues and advice set out in document. Need to ensure integration of planned infrastructure improvements with allocation and implementation of Local Plan development proposals.</p> | Outlines impacts on water management (quality and availability) from development and other environmental factors. | Sustainability objectives included that considers that sustainable management of water resources, minimises demand and improves quality. |
| Severn Trent Water Resources Management Plan 2024 | As above. | As above. | As above. |
| Thames Water Water Resources Management Plan 2024 | As above. | As above. | As above. |

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|--|---|--|---|
| Wessex Water Water Resources Management Plan 2024 | As above. | As above. | As above. |
| Local | | | |
| Cotswold District Council Corporate Plan 2024-2028 | <p>The aim of the Corporate Plan is to recreate a Council that's proactive and responsive to the needs of our residents and businesses in a fast-changing environment, and to build for the future while respecting our heritage.</p> <p>The Council will do this by:</p> <ul style="list-style-type: none"> • Delivering good services. • Responding to the climate emergency. • Delivering housing. • Supporting communities; and • Supporting the economy. | <p>The Local Plan is a related key document and is the spatial enactment of priorities that are brought forward in the Corporate Plan.</p> <p>Planning policy needs to consider relevant commitments made in the Corporate Plan and how this should be delivered both strategically and physically on the ground. Will affect potential allocation, economic and environmental considerations.</p> | <p>Provides baseline information that needs to be taken into account and related sustainability issues and objectives. Resulting sustainability objectives will apply to multiple topics.</p> |
| Cotswold District Council Level 1 Strategic Flood Risk Assessment (2023) | <p>The main planning policy and flood risk recommendations to come out of this SFRA are outlined briefly below and are based on the fundamentals of the National Planning Policy Framework and the Flood Risk and Coastal Change Planning Practice Guidance.</p> <p>SFRA recommendation:</p> <ul style="list-style-type: none"> • No development within the functional floodplain, unless development is water compatible. • Surface water flood risk should be considered with equal importance as fluvial/tidal risk. • The sequential approach must be followed in terms of site allocation and site layout. • Ensure site-specific Flood Risk Assessments are carried out to a suitable standard, where required, with full consultation required | <p>Planning policies should be informed by the findings of the SFRA, and policies should seek to direct development to areas of no or minimal flood risk wherever possible.</p> | <p>Sustainability issues and objectives to consider water management and flood risk.</p> |

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|---|---|---|---|
| | <p>with the LPA/LLFA, the EA, Thames Water, Severn Trent and Wessex Water.</p> <ul style="list-style-type: none"> • Appropriate investigation and use of SuDS. • Natural Flood Management techniques must be considered for mitigation. • Phasing of development must be carried out to avoid possible cumulative impact; and • Planning permission for at risk sites can only be granted by the LPA following a site-specific FRA. | | |
| Cotswold District Green Infrastructure Strategy (2023) | <p>The Green Infrastructure Strategy has been prepared to direct the design and delivery of Green Infrastructure (GI) in Cotswold District to maximise its environmental, community and economic benefits. It is a guide for delivering high quality Green Infrastructure through new developments, community partnership and land management. It identifies a number of Green Infrastructure issues at a District and at a more local scale. A range of evidence has been used to inform the Strategy, including legislation and guidance. The Strategy forms part of the evidence base for the Local Plan Review and other new plans and strategies, as well as providing further detail to reinforce the adopted Local Plan 2011-2031.</p> | <p>Take account of the needs assessment of GI, open space and play space provision, highlighting national standards, and seek to protect important sites.</p> | <p>Sustainability issues and objectives that seek the protection of and access to important GI, open space and play space.</p> |
| Cotswolds Tourism Destination Management Plan 2022-2025 | <p>The vision for tourism in the Cotswolds is:</p> <p>"To ensure that the Cotswolds is a vibrant year-round destination where visitors enjoy high quality, authentic experiences and tourism makes an increasing contribution to the economic, social and environmental sustainability of the local economy."</p> <p>Under this sit six key areas, each with a number of priorities within them:</p> <ol style="list-style-type: none"> 1. Sustainability. 2. Partnerships. 3. Product. 4. Marketing. 5. Knowledge and data; and | <p>The Local Plan will have to ensure the tourism related objectives and policies are consistent with the DMP.</p> | <p>Sustainability issues and objectives that consider the importance of tourism throughout the district as well as areas that significantly benefit from tourism.</p> |

| Plan or programme | Key objectives and/or proposals | Implications for the LPR | Implications for the IIA |
|--|--|---|---|
| Made Neighbourhood Plans | <p>6. Performance.</p> <p>Introduced by the Localism Act 2011, a neighbourhood development plan (NDP) puts in place planning policy for a neighbourhood area to guide future development. It may contain a vision, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development. All NDPs must meet the 'basic conditions' set out in planning law. This will be tested through an independent examination.</p> | <p>Take account of the policies within 'made' NDPs that form part of the Development Plan for the District, which guide and shape development in all or part of the neighbourhood area.</p> | <p>Sustainability issues and objectives that support NDPs and include issues of local importance. These may cover several themes, such as promoting sustainable transport, employment, health or education.</p> |

Appendix B Key sustainability issues and IIA Framework

B.1 Key sustainability issues

Table B.1 Key sustainability issues

| Baseline information topic | Key sustainability issues |
|----------------------------|---|
| Population | <ul style="list-style-type: none"> • An aging population needs good accessibility to services and facilities and suitable housing to enable them to live independently for longer and avoid social isolation. • With a lower than average economically active population, the district has to import a significant part of its workforce from elsewhere, increasing commuting journeys. • Fewer younger people reduces the viability of some services and facilities. |
| Health and deprivation | <ul style="list-style-type: none"> • Services, facilities, employment opportunities and jobs are needed that are accessible to all sections of the community. • More sports facilities are needed to keep the district's population fit and healthy and to tackle obesity. • Living environment improvements are needed to improve the health of people in lower social and economic status groups. • Measures are needed to improve the district's health and wellbeing, such as promoting active travel and physical activity and to decrease car use and providing employment opportunities in traditional and emerging sectors. |
| Housing | <ul style="list-style-type: none"> • Household size – New housing developments need to meet the needs of the increasing number of smaller households. • House size - Flats and terraced houses utilise less energy and they can be built in higher densities meaning that less land is required. • Significant over-delivery - Continuing to deliver significantly more housing than is required is stressing the district's infrastructure. It inflates the calculation of future housing need and ultimately leads the district to a position where it is no longer able to meet its housing needs, constraining its ability to deliver plan-led development. • Affordability – Many younger people cannot afford to live in the district. People working in the district are often unable to live close to their jobs. These problems increase car journeys and social isolation. • Affordable housing - even 'affordable housing' can still be unaffordable to the people who need it because affordability relates to the market value of housing • Second home ownership - multiple home ownership reduces the amount of available housing stock that could otherwise contribute towards meeting the district's housing need. |
| Economy and employment | <ul style="list-style-type: none"> • The SAAS shows that employment in agriculture and forestry has decreased modestly against the base year (2015) but increased in leisure and tourism. Employment in emerging sectors has increased significantly in relative terms. • Very few locations in Cotswold District offer positive viability thresholds for new employment development. The district's established employment sites therefore play a critical role in meeting the district's economic and business needs. Protection of |

| Baseline information topic | Key sustainability issues |
|----------------------------|--|
| | <p>such sites and support for their potential intensification is needed to attract new businesses and ensure that existing businesses are retained and have the opportunity to grow.</p> <ul style="list-style-type: none"> • An ageing population will have an impact on the economically active age group. This, combined with difficulties in attracting workers due to median wages below the national average; and the high cost of living and the affordability of housing is a key issue for the district. • Need for improved broadband connectivity, particularly in rural areas to support rural economy and reduce the need to travel. • Need to compete with larger surrounding towns such as Swindon, Cheltenham, Tewkesbury and Gloucester; and focus on its highly skilled workforce and attractive high-quality environment to live and work. |
| Town centres | <ul style="list-style-type: none"> • In social terms: ensuring that town centres retain their important role as community hubs through ensuring that they are resilient, flexible and adaptable to change. • In environmental terms: ensuring that the built and historic environment of town centres does not suffer degradation as a result of economic decline. Ensuring that town centre infrastructure is upgraded to enable full use of electric vehicles, thereby reducing air-borne pollutants contributing to climate change. Ensuring that town centre infrastructure is able to support and encourage the use of public transport instead of private vehicles, thereby reducing air-borne pollutants contributing to climate change. • In economic terms: ensuring that town centres are resilient to changes in the “traditional” retail-dominated high street to ensure their continued vitality and economic role. The changing nature of town centres in response to web-based commerce requires a fresh approach to the traditional mix of uses. Greater emphasis on leisure, employment, culture and residential uses and correspondingly less emphasis on retail may be required. |
| Tourism | <ul style="list-style-type: none"> • Limited range of public transport options. • Concentration of tourism in honeypot destinations with little to offer younger people and families. • Balancing of needs between visitors and locals to avoid conflict and retain a sense of place. • Potential environmental damage e.g. erosion caused by increased visitor numbers. • Climate change can be exacerbated by tourism where long journeys from home to destination using fossil fuel-powered transport are entailed. |
| Transport | <ul style="list-style-type: none"> • Poor accessibility leaves many people isolated from friends and family, key services, and their place of employment. • The district has a reliance on private car use. • Public transport is not currently a realistic alternative mode of transport in many parts of the district. • Households owning numerous cars reinforces the reliance on accessing services and facilities by car. • The infrastructure is not currently in place to support electric vehicles and move away from fossil fuels. |
| Biodiversity | <ul style="list-style-type: none"> • Recreational pressures on Internationally Important Sites and other sites known for biodiversity interest. • Declining Biodiversity habitats and species globally, nationally and locally. • Fragmentation of habitats, small habitat pockets, lack of connectivity between sites and the limited ability to create new and larger sites for biodiversity. |

| Baseline information topic | Key sustainability issues |
|--|--|
| | <ul style="list-style-type: none"> • Lack of understanding of key biodiversity issues at a development industry level. • Need to consider climate change adaptation and mitigation for biodiversity. • Biodiversity at a local level needs to take into consideration a specific site, but also how that site sits, and connects to other biodiversity features in the area. Without considering, the bigger biodiversity picture, there is a risk that any potential improvements, will be missed. |
| Green infrastructure | <ul style="list-style-type: none"> • The need to further integrate the multifunctional benefits of GI and the role it has to play in addressing issues relating to climate change, the environment as a whole, as well as health and wellbeing. This includes the role GI has in contributing to healthier communities through the design of homes, their location and the grey and green infrastructure required to support them. • A key issue related to Green Infrastructure is the long-term management of public open spaces. As a result, the Council has been involved in the “Fairer management of public open space within residential developments” project. • Green infrastructure at a local level needs to take into consideration a specific site, but how that site also sits, and connects to other GI in the area. Without considering, the bigger GI picture, there is a risk that any potential improvements, will be overlooked. |
| Natural capital (and ecosystem services) | <ul style="list-style-type: none"> • The natural environment provides multiple benefits for humans, but the benefits are not officially measured by loss or gain. • Unless there is significant recognition of the services that are provided by the environment there is a strong risk that this could be overlooked, and those services endangered - for example the role of upstream woodlands in protecting lowland areas from flooding etc. • Mapping natural capital enables a better understanding of its role and where it can be enhanced to deliver multiple benefits. • The UK’s national accounts do not consider the depreciation of natural assets and many of the benefits are not included in the GDP. • Natural capital mapping prepared by the Gloucestershire Local Nature Partnership provides useful information which is not currently referred to in the local plan. Underpins a number of policy areas. |
| Climate change | <ul style="list-style-type: none"> • Climate change is likely to exacerbate health risks and inequalities associated with building overheating, indoor air pollution, flood damage, and water and biological contamination in the indoor environment. Disruptions to daily life related to climate change can mean lost work and school days and may harm trade, transportation, agriculture, energy production, and tourism. Severe weather events can delay planting and harvesting, cause power outages, cause travel disruption, and otherwise make it difficult for people to go about their daily business, all of which will have an effect on the economy. • Parts of the District are more susceptible to the impacts of climate change, most notably areas with higher flood risk. • The reasons for the district’s reducing carbon footprint are not understood and need to be investigated. |
| Historic environment | <ul style="list-style-type: none"> • Ensuring that heritage assets are managed and maintained appropriately • How to manage change which protects and enhances the historic environment for future generations, while meeting the needs of current occupiers and users, for example the move from retail uses. • Using the historic environment as an “inspiration” for the design of new developments. |

| Baseline information topic | Key sustainability issues |
|----------------------------|---|
| | <ul style="list-style-type: none"> • Relatively few non-ecclesiastical listed buildings are deemed to be at risk; however, it is still crucial that these are addressed (churches and scheduled monuments). • The need to consider the impacts of climate change on the historic environment. • Within the Council there is an increase in interest regarding how the historic environment can deliver on the climate change agenda. |
| Landscape | <ul style="list-style-type: none"> • Finding the right balance between the need for more renewable energy provision and the existing landscape character. • The threat of losing significant landscape features, for example the loss of trees from Ash Dieback and other tree diseases. • Change of landscape features as a result of climate change. • The changing face of agriculture, including changes to government support systems for agriculture, new crops, potential intensification, diversification, the transition from the Common Agricultural Policy (CAP) to the Environmental Land Management Scheme. • Increased traffic, noise and light pollution. • Increased pressure on Public Rights of Way and National Trails as a result of tourism • To ensure that development is designed and sensitively located to respect the Cotswold District's landscape and built heritage. • Making sure that the landscape is also valued for its multifunctional role including health and wellbeing as part of Green Infrastructure. |
| Soils and air quality | <ul style="list-style-type: none"> • Contamination and pollution - identifying all contaminated or polluted land. Remediating the situation where necessary, particularly where development is planned or where the contamination is hazardous. • Air quality - poor air quality is a risk to public health and has other environmental impacts. • Soils - The comparatively high level of development on green field sites needs to be addressed. • Information regarding the loss of grades 1, 2 and 3a agricultural land is not comprehensively available for the district at present. This needs to be addressed. |
| Minerals | <ul style="list-style-type: none"> • The district is a mineral resource area. Whilst minerals can only be worked where they are found, extraction can result in a range of environmental problems unless it is controlled and managed. Planning for mineral extraction is a "county matter". The after use of sites can be a matter for the district council. |
| Waste | <ul style="list-style-type: none"> • The management of all waste as high up the waste hierarchy as possible is a key sustainability issue related to resource depletion, environmental pollution and climate change. |
| Water quality | <ul style="list-style-type: none"> • Increase in population growth may require infrastructure upgrades to enable development, to accommodate higher flows and/or to prevent a WFD deterioration • The development of each site could have an impact, particularly in relation to biodiversity and water quality, and where Good Ecological Status (GES) has not been reached. - run-off from increased development may worsen water quality. |

| Baseline information topic | Key sustainability issues |
|----------------------------|---|
| Water resources | <ul style="list-style-type: none"> Thames Water's (and other companies) ability to maintain a continuous supply to customer demands especially during hot, dry weather. Increase in water demand adds pressure to existing supply infrastructures and upgrades will be required, combined with the uncertainty over the impact of climate change. |

B.2 IIA Framework

| IIA theme | IIA objective | Appraisal questions: Will the option / proposal help to... |
|----------------------------------|---|--|
| 1. 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. | <ul style="list-style-type: none"> enable and encourage younger people to live and work in the district? enable older people to live close to facilities, services and other people? tackle social and functional isolation by making provision for interaction such as safe and accessible spaces, parks, community hubs? provide essential community services and facilities including healthcare, Green Infrastructure and allotments? enable "lifetime homes"? increase physical activity, reduce obesity and improve mental health and wellbeing through the design and layout of schemes, provision of facilities for sport and recreation? improve access to the countryside for recreation? provide mixed use, mixed housing type and mixed tenure developments? enable access to further education / training opportunities? |
| 2. 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. | <ul style="list-style-type: none"> improve housing affordability? provide sufficient affordable housing for those who need it? be appropriately located having regard to facilities, services and environmental quality? reduce the number of second homes delivered on new developments? provide energy efficient homes? provide housing that is designed and constructed sustainably, using where feasible recycled or recovered materials? retrofit sustainable infrastructure, where possible? provide good garden / light standards? |

| IIA theme | IIA objective | Appraisal questions: Will the option / proposal help to... |
|--------------------------------|--|--|
| 3. 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. | <ul style="list-style-type: none"> • encourage the retention and / or growth of existing businesses? • provide accessible jobs? • provide live / work units and workspace for locally appropriate businesses? • provide sites for business and employment within communities? • encourage the use of local services and purchasing of local products? • ensure housing is delivered which can attract workers? • contribute to supporting the rural economy particularly though retaining or increasing the number of people employed in agriculture and tourism? • support the roll out of high-speed broadband? • contribute to a low carbon economy? • encourage larger businesses to locate in the district? • encourage a range of jobs and premises and in particular increase the number of people employed in emerging economic sectors? • support vitality and viability of existing town centres by helping them to be more flexible and responsive to change? |
| 3. Economy and Employment | Encourage and support the development of sustainable tourism. | <ul style="list-style-type: none"> • seek to avoid environmental damage e.g. erosion caused by increased visitor numbers? • support the visitor economy? |
| 4. Equalities | Advance equality for all. | <ul style="list-style-type: none"> • Promote access for all including those with and without shared protected characteristics? • Provide opportunities to foster good relations between groups? |
| 5. 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. | <ul style="list-style-type: none"> • reduce the need to travel? • encourage modal shift, particularly in respect of journeys to work, through walking, cycling and use of public transport? • promote sustainable and active travel for all residents including the needs of specific groups and the infrastructure required to support that? • prevent the exacerbation of air pollution in areas susceptible to poor air quality? |
| 6. Climate Change (mitigation) | Take an active role in achieving net zero carbon by 2050 if not before. | <ul style="list-style-type: none"> • encourage measures to reduce carbon emissions? • encourage / enable improvements to the energy efficiency of the district’s existing building stock? • increase energy efficiency and reduce greenhouse gas emissions? • increase the generation and use of renewable energy? |

| IIA theme | IIA objective | Appraisal questions: Will the option / proposal help to... |
|---|--|---|
| | | <ul style="list-style-type: none"> • address the negative impact of climate change, go beyond mitigation to achieve carbon neutral development? • minimise the need to travel by unsustainable means? • adjust to future needs through being flexible and adaptive to the effects of climate change (heat, drought, extreme weather)? • ensure that development takes place in accordance with the Strategic Flood Risk Assessment, Water Cycle Study and sequential test for flood risk, taking into account the likely effects of climate change? |
| 6. Climate Change (adaptation) | Ensure adaptability to climate change that, where feasible, goes beyond simple limitation of negative effects. | <ul style="list-style-type: none"> • reduce vulnerability to climate change impacts? • reduce flood risk, manage run-off sustainably and ensure the direct or indirect risk of flooding on site or downstream of the site is not increased by the development? • ensure that development takes place in accordance with the Strategic Flood Risk Assessment, Water Cycle Study and sequential test for flood risk, taking into account the likely effects of climate change? |
| 7. Historic Environment | Conserve and enhance the historic environment of the district. | <ul style="list-style-type: none"> • conserve and enhance the historic environment? • protect the historic settlement pattern and distinctive character of the towns and villages of the district? • ensure beneficial use and long-term management of heritage assets? • ensure that historic environment is used as a key driver and focus for inward investment regeneration and redevelopment, particularly within our historic market towns? • increase public awareness of the historic environment? |
| 7. Historic Environment | Deliver high quality and well-designed sustainable development that responds appropriately to its context. | <ul style="list-style-type: none"> • be sustainably and sympathetically designed having regard to its context? • respond appropriately to its context though being supported by a detailed characterisation study? |
| 8. Landscape | Conserve, restore and enhance the character of landscapes in the district. | <ul style="list-style-type: none"> • conserve, restore and enhance the landscape (character, appearance and quality) of the district, including landscape assets, trees, setting of settlements? • maintain the tranquillity of the district, including the protection and promotion of Dark Skies? • support the integrity of the Cotswolds National Landscape in line with the vision and objectives of the latest published management strategy? • safeguard the integrity of Special Landscape Areas across the district? |
| 9. Green Infrastructure and Natural Capital | Conserve and enhance green infrastructure assets and networks and exploit its multi-functional benefits. | <ul style="list-style-type: none"> • deliver the Council's GI Strategy? • maximise multiple benefits provided by GI? • link and enhance existing GI assets and networks? |

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

Appendix C Assessment of Broad Locations for Development

Table C1: Matrix to determine the relative sustainability merits of delivering growth in each ‘Broad Zone’

| Rating | Housing | Economy and employment | Transport and air quality | Climate change adaptation | Historic environment | Landscape | Green infrastructure and natural capital | Biodiversity | Land, soil and water resources |
|----------------|---|--|--|---|---|--|---|---|---|
| Major positive | The zone has capacity to accommodate a large amount of new housing (5,000 homes and above). This includes all extension levels and new settlements, including large village and town / city growth. | The zone contains, or is adjacent to, an established employment site, and is within proximity to a principal settlement. | Zone contains at least two of the following: rail stations and infrastructure, bus services, and / or national cycle network. Additionally, there is no overlap with an air quality management area. | Zone is not constrained by flood risk issues: there is no overlap with Flood Zone 2 or 3 and surface water flood risks are low. | The zone does not contain any nationally or locally designated heritage assets or areas. | The zone does not overlap with a Special Landscape Area and has a low landscape sensitivity. | The zone overlaps with all three of the following (according to Natural England’s Green Infrastructure Framework): green infrastructure assets that are thought to be publicly accessible, land with permissive access, and woodlands ²⁵ . | The zone overlaps with Network Enhancement Zone 1 and / or 2, and as such development has the potential to restore and improve ecological connectivity. | Growth within the zone has the potential to regenerate areas of underutilised or previously developed land (i.e., the zone is primarily brownfield land). |
| Minor positive | The zone has capacity to accommodate a level of new housing (below 5,000 homes). This includes small village growth, and all | The zone contains, or is adjacent to, an established employment site but is not within proximity to a | Zone contains at least two of the following: rail stations and infrastructure, bus services, and / or national cycle network. | Zone is not constrained by fluvial flood risk issues (i.e., there is no overlap with Flood Zone 2 or 3), but surface water | Designated heritage assets are limited to Grade II listed buildings. However, it is anticipated that growth would not impact the setting of Grade | The zone does not overlap with a Special Landscape Area and has a medium-low | The zone overlaps with one or two of the following (according to Natural England’s Green Infrastructure Framework): green infrastructure | The zone overlaps with Network Expansion Zones, and as such development has the potential to expand | There are isolated areas of brownfield land within the zone, and most of the land is classified as Grade 3 (or lower). |

²⁵ It is assumed that the presence of existing green infrastructure assets will be retained and enhanced if growth comes forward within the boundaries of a broad location, with a view to delivering on the aims and objectives within CDC’s wider Green Infrastructure Strategy.

| Rating | Housing | Economy and employment | Transport and air quality | Climate change adaptation | Historic environment | Landscape | Green infrastructure and natural capital | Biodiversity | Land, soil and water resources |
|-----------------------|-------------------------|---|--|---|---|--|---|---|---|
| | extension growth types. | principal settlement. | However, there is an overlap with an air quality management area. | flood risks are prevalent. | II listed buildings. | landscape sensitivity. | assets that are thought to be publicly accessible, land with permissive access, and woodlands. | habitat networks. | |
| Neutral to no effects | N/A | N/A | Zone only provides access to one of the following: rail stations and infrastructure, bus services, and / or national cycle network. Additionally, there is no overlap with an air quality management area. | There are isolated areas at risk of fluvial and surface water flooding in the zone. However, it is anticipated that growth could be accommodated outside of these risk areas or issues could be addressed via natural drainage solutions. | The zone does not contain any nationally designated heritage assets and areas but does contain locally designated heritage assets and / or areas. | N/A | Development in the zone would neither contribute to or impact upon green infrastructure and accessibility to it (i.e., as the zone does not overlap with assets on Natural England's GI Framework). | The zone does not overlap with, nor is it in proximity to, European, nationally and locally designated sites. | The zone comprises greenfield land but is not constrained by any of the following: Grades 1 or 2 land, a river / stream, NVZ, SPZ, drinking water safeguarding zones, and mineral safeguarding areas. |
| Minor negative | N/A | The zone does not contain, or is not adjacent to an established employment site, but is | Zone only provides access to one of the following: rail stations and infrastructure, bus services, | Zone is constrained by fluvial flood risk issues in several locations (i.e., there is overlap with Flood | The zone contains or is within the setting of up to two of the following: Grade I or II* listed buildings; | The zone overlaps with a Special Landscape Area or has a medium to | N/A | Growth within the zone has the potential to directly impact regionally or locally designated | Zone has constraints to growth given the presence of up to two of the following: Grades 1 or 2 land, a |

| Rating | Housing | Economy and employment | Transport and air quality | Climate change adaptation | Historic environment | Landscape | Green infrastructure and natural capital | Biodiversity | Land, soil and water resources |
|----------------|---------|--|---|---|---|---|--|--|--|
| | | within proximity to a principal settlement. | and / or national cycle network. Additionally, there is an overlap with an air quality management area. | Zone 2 or 3), but surface water flood risks are low. | scheduled monuments; conservation areas; registered parks and gardens; registered battlefields. | high landscape sensitivity. | | sites and / or priority habitats. | river/stream, NVZ, SPZ, drinking water safeguarding zones, and mineral safeguarding areas. |
| Major negative | N/A | The zone does not contain, or is not adjacent to an established employment site, nor is it well positioned to connect to a principal settlement. | Zone has no access to sustainable transportation opportunities. Additionally, there is an overlap with an air quality management area | Zone is constrained by fluvial flood risk issues in several locations (i.e., there is overlap with Flood Zone 2 or 3), and surface water flood risks are prevalent. | The zone contains or is within the setting of at least three of the following: Grade I or II* listed buildings; scheduled monuments; conservation areas; registered parks and gardens; registered battlefields. | The zone overlaps with a Special Landscape Area and has a medium to high landscape sensitivity. | N/A | Growth within the zone has the potential to directly impact European or nationally designated sites. | Zone has constraints to growth given the presence of at least three of the following: Grades 1 or 2 land, a river/stream, NVZ, SPZ, drinking water safeguarding zones, and mineral safeguarding areas. |

Table C2: Assessment findings for each 'Broad Zone'

| Broad Zone | Housing | Economy and employment | Transport and air quality | Climate change adaptation | Historic environment | Landscape | Green infrastructure and natural capital | Biodiversity | Land, soil, and water resources |
|------------|---------|------------------------|---------------------------|---------------------------|----------------------|-----------|--|--------------|---------------------------------|
| 1 | | | | | | | | | |
| 2 | | | | | | | | | |
| 3 | | | | | | | | | |
| 4 | | | | | | | | | |
| 5 | | | | | | | | | |
| 6 | | | | | | | | | |
| 7 | | | | | | | | | |
| 8 | | | | | | | | | |
| 9 | | | | | | | | | |
| 10a | | | | | | | | | |
| 10b | | | | | | | | | |
| 11 | | | | | | | | | |
| 12a | | | | | | | | | |
| 12b | | | | | | | | | |
| 12c | | | | | | | | | |
| 13 | | | | | | | | | |

| Broad Zone | Housing | Economy and employment | Transport and air quality | Climate change adaptation | Historic environment | Landscape | Green infrastructure and natural capital | Biodiversity | Land, soil, and water resources |
|------------|---------|------------------------|---------------------------|---------------------------|----------------------|-----------|--|--------------|---------------------------------|
| 14 | | | | | | | | | |
| 15 | | | | | | | | | |
| 16 | | | | | | | | | |
| 17 | | | | | | | | | |
| 18 | | | | | | | | | |
| 19 | | | | | | | | | |
| 20 | | | | | | | | | |
| 21a | | | | | | | | | |
| 21b | | | | | | | | | |
| 21c | | | | | | | | | |
| 21d | | | | | | | | | |
| 22 | | | | | | | | | |
| 23 | | | | | | | | | |

