

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

**Interim IIA Report to accompany
Issues and Options consultation**

February 2022

Quality information

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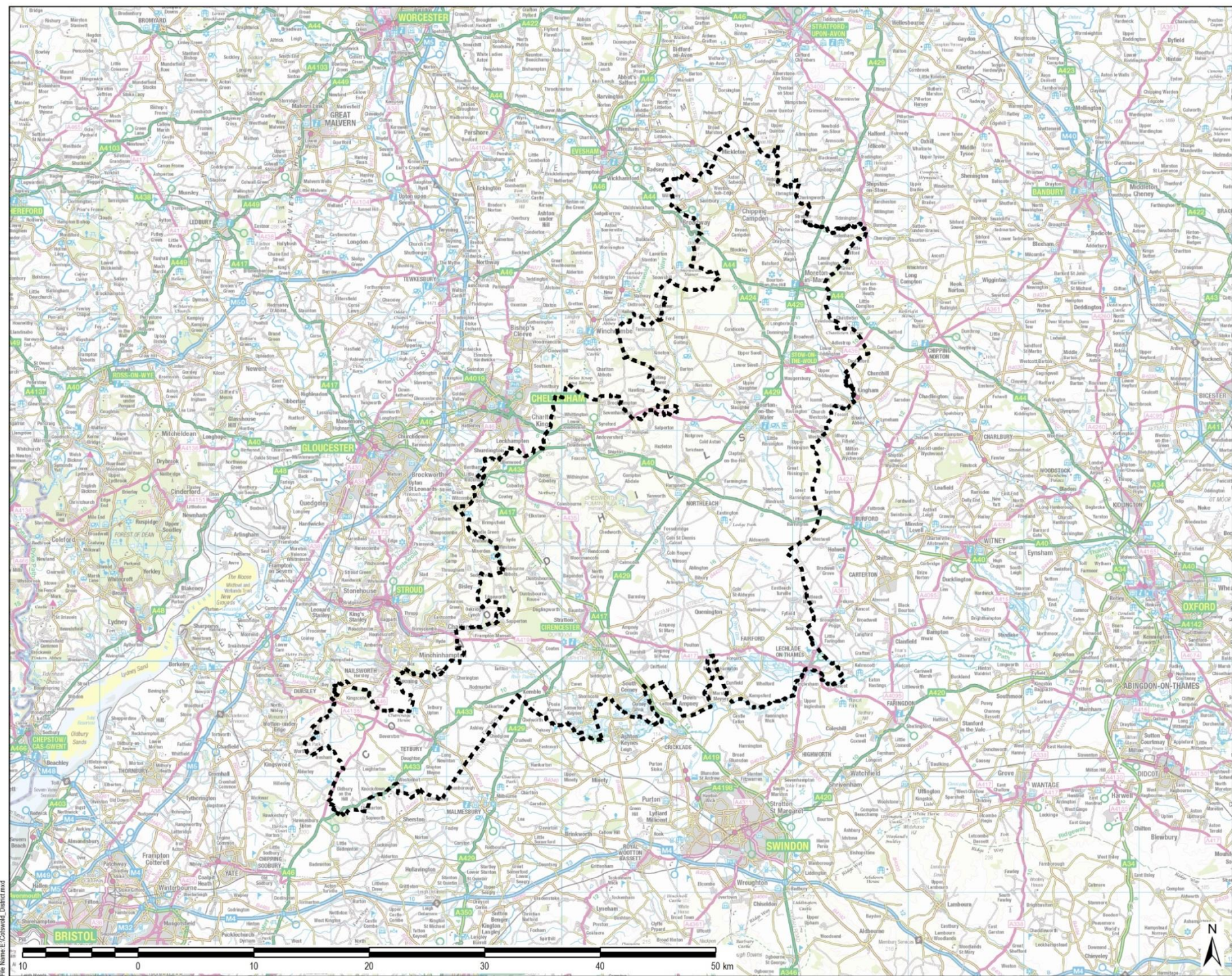
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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Integrated Impact Assessment (incorporating Strategic Environmental Assessment/Strategic Environmental Assessment, Health Impact Assessment and Equalities Impact Assessment) in support of the emerging Cotswold Local Plan Update.
- 1.2 Cotswold District Council (CDC) is currently undertaking a Local Plan Update (LPU) for Cotswold District. This will update the current Local Plan, which was adopted in August 2018. National policy requires local plans to be kept up to date and a review of the Local Plan has to be carried out within five years of adoption. Following an evaluation of the Local Plan in 2020, CDC concluded that a partial update is required to take account of new corporate objectives and other material considerations such as the National Planning Policy Framework 2020.
- 1.3 The LPU, which will cover the existing Local Plan period to 2031, will comprise a targeted update focussing on specific issues. The update to the Local Plan focuses only on issues that need modification within the plan period (to 2031); it does not invite consultation and examination on matters beyond the plan period.
- 1.4 The updated Local Plan will continue to be the key planning policy document for the District and will guide decisions on the use and development of land. It is currently anticipated that the LPU will be submitted the Secretary of State and then undergo an independent Examination in Public in 2023.
- 1.5 Key information relating to the LPU is presented in **Table 1.1** below.

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

Name of Responsible Authority	Cotswold District Council
Title of Plan	Cotswold Local Plan Update
Subject	Development plan
Purpose	<p>The updated Local Plan will guide future development and land use within Cotswold District over the period up to 2031.</p> <p>Updating the Cotswold Local Plan adopted in August 2018, the LPU will, alongside Neighbourhood Plans, comprise the development plan for the District and will be the primary basis against which planning applications are assessed.</p>
Timescale	To 2031
Area covered by the plan	<p>Cotswold District in Gloucestershire</p> <p>(Figure 1.1 above)</p>
Summary of content	The updated Local Plan will set out the vision, strategy and policies to manage growth and development in Cotswold District in the period to 2031.
Plan contact point	<p>Joanne Corbett, Senior Planning Policy Officer, Cotswold District Council</p> <p>Email address: joanne.corbett@cotswold.gov.uk</p>

Current stage of plan-making

- 1.6 This Interim SA Report accompanies the current consultation on the Issues and Options document for the LPU.¹
- 1.7 At the current stage of plan-making CDC is not consulting on a full draft plan. Rather, the Council is consulting on an initial 'Issues and Options' document. The aim of the Issues and Options consultation is to gain stakeholders' views on the approach LPU policies can take on various key planning issues for the District. The document is an initial stage in developing the LPU and has been prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012).
- 1.8 The current Issues and Options consultation precedes the publication of the pre-submission version of the LPU for Regulation 19 consultation later in 2022. Drawing on consultation responses received at the current stage of plan-making and new evidence base studies undertaken to inform the LPU, this document will set out the proposed policies for the LPU.

IIA explained

- 1.9 Integrated Impact Assessment (IIA) fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and discharges the duties for Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).
- 1.10 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 LPU seeks to maximise the developing plan's contribution to sustainable development and the quality of life of residents.
- 1.11 The approach is to fully integrate these components and issues to provide a single assessment process to inform the development of the LPU. A description of each of the various components and their purpose is provided below.

Sustainability Appraisal (SA)

- 1.12 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.
- 1.13 The National Planning Policy Guidance (NPPG) states that the role of SA is "*...to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.*"²
- 1.14 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.

¹ Cotswold District Council (February 2022) *Cotswold District Local Plan 2011 – 2031 (2021 Update): Regulation 18 Issues and Options Consultation*

² National Planning Practice Guidance. Paragraph: 001 Reference ID: 11-001-20190722

Equalities Impact Assessment (EqIA)

- 1.15 As a public sector organisation, Cotswold District Council has a duty under the Equality Act 2010³ 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 a protected characteristics⁴ and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.
- 1.16 The Equality Act 2010 legally protects people from discrimination both in the workplace and in wider society. It replaces previous anti-discrimination laws which include the Sex Discrimination Act 1975, Race Relations Act 1976 and the Disability Discrimination Act 1995. The Act ensures that individuals with certain 'protected characteristics' are not indirectly or directly discriminated against. The protected characteristics include:
- **Age:** this refers to persons defined by either a particular age or a range of ages.
 - **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.
 - **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity.
 - **Marriage and civil partnership:** marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples.
 - **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth.
 - **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins.
 - **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief.
 - **Gender:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives.
 - **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
 - **Socio-economic status:** a person's socio-economic status referring to combined economic and sociological measure of a person's work experience and economic and social position in relation to others, based on income, education, and occupation.

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

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

Health Impact Assessment (HIA)

- 1.17 There are numerous links between planning and health highlighted throughout the NPPF. Paragraph 92 of the NPPF states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities and the NPPG states that Local Planning Authorities should ensure that health and wellbeing, and health infrastructure are considered in Local Plans and in planning decision-making.⁵
- 1.18 The 2020 Health Equity in England Report⁶ identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined for the poorest 10%. These inequalities have been exacerbated by the COVID-19 pandemic.
- 1.19 In response to these issues, a Health Impact Assessment (HIA) is being integrated within the IIA process. HIA is a tool used to identify and assess the potential impacts of a plan. It identifies positive impacts and minimises the negative impacts of a plan, with a view to informing decision making.

Habitats Regulations Assessment

- 1.20 A Habitats Regulations Assessment (HRA) is being undertaken in parallel to the IIA. The primary aim of HRA is to ensure the protection of sites that host habitats and species of European importance. This process is set out in Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') and the Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations').⁷
- 1.21 Given distinct legislative requirements and processes, the findings of the HRA will be reported on separately from the IIA. The HRA will however closely inform and engage with the IIA process throughout the development of the LPU.

Integrated Impact Assessment

- 1.22 As previously explained, the IIA seeks to fulfil the requirement for SA and addresses the duty to undertake an EqlA and HIA. The approach is to fully integrate these to provide a single assessment process to inform the development of the LPU. This will be achieved through a fully integrated appraisal framework, discussed in more detail in Chapter 2.
- 1.23 The following figure highlights the stages of the IIA.

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

⁶ The Health Foundation (2020) Health Equity in England: The Marmot Review 10 Years On

⁷ The requirement for HRA is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010.

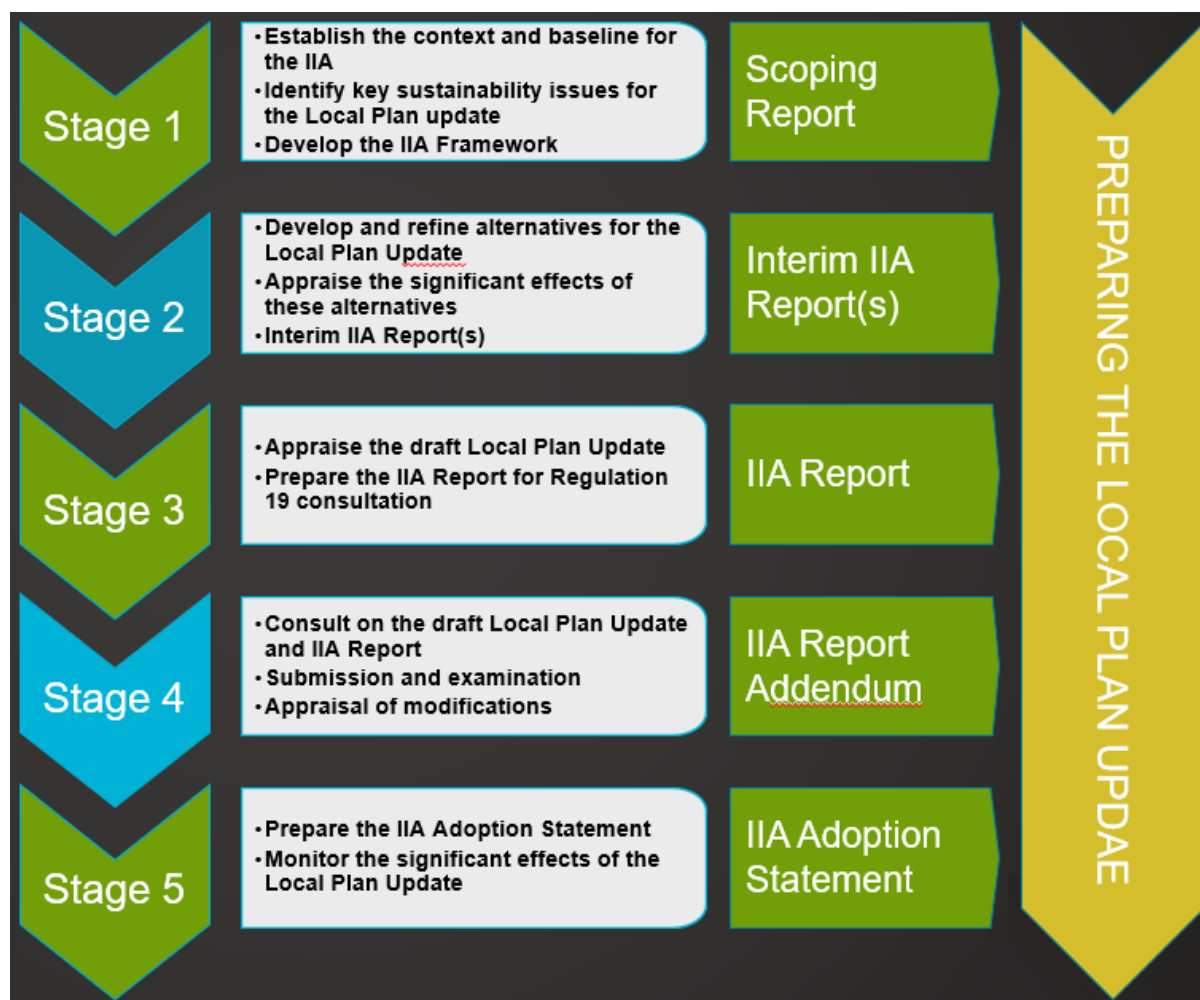


Figure 1.2: Stages of the IIA process

This Interim IIA Report

- 1.24 This Interim IIA Report comprises part of Stage 2 in the figure above. At the current stage of plan-making, CDC is not consulting on a full draft plan. Rather, the Council is consulting on an initial 'Issues and Options' document.
- 1.25 This Interim IIA Report has therefore been produced voluntarily with the intention of informing this early stage of preparation of the LPU. Specifically, this report presents an appraisal of a series of high-level approaches and alternatives which are currently being evaluated as part of plan development. This is for the benefit of those who might wish to make representations through the consultation and for the benefit of the plan-makers tasked with selecting preferred approaches for the LPU.
- 1.26 Subsequent stages of the IIA process will consider more detailed LPU options, including through an assessment of alternatives associated with housing numbers and spatial strategies. The findings of these assessments will be presented in an IIA Report accompanying Regulation 19 consultation on the pre-submission version of the LPU.
- 1.27 The next steps for the LPU's development and accompanying IIA process are discussed in more detail in **Chapter 13**.

2. Scope of the appraisal

What is the scope of the appraisal?

- 2.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁸ These authorities were consulted on the scope of the LPU IIA in late 2020.
- 2.2 The baseline information (including baseline data and context review) initially included in the IIA Scoping Report has been updated in the period since and provides the basis for the IIA process.

IIA Framework

- 2.3 Drawing on the review of the sustainability context and baseline, the Scoping Report identified a range of sustainability issues that should be a particular focus of IIA, ensuring it remains targeted on the most important issues. These issues were then translated into an IIA ‘framework’ of objectives and appraisal questions.⁹
- 2.4 The IIA Framework provides a way in which the sustainability effects of the LPU and alternatives can be identified and subsequently analysed based on a structured and consistent approach.
- 2.5 The IIA Framework and the appraisal findings in this Interim IIA Report have been presented under eleven IIA themes, reflecting the range of information being considered through the IIA process. These are:
 - Healthy and Vital Communities.
 - Housing.
 - Economy and Employment.
 - Equalities.
 - Transport and Air Quality.
 - Climate Change.
 - Historic Environment.
 - Landscape.
 - Green Infrastructure and Natural Capital.
 - Biodiversity.
 - Land, Soil and Water Resources.
- 2.6 The IIA Framework is presented in **Table 2.1** below.

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

Table 2.1: Cotswold Local Plan Update IIA Framework

IIA theme	IIA Objective	Appraisal questions: Will the option/proposal help to...
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	<p>Achieve sustainable economic growth and opportunities for employment, including support for the rural economy.</p> <p>Support the resilience and vitality of town centres during transformation from the “traditional” retail-dominated high street to a more flexible and responsive model.</p>	<ul style="list-style-type: none"> – 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?
	<p>Encourage and support the development of sustainable tourism.</p>	<ul style="list-style-type: none"> – seek to avoid environmental damage e.g. erosion caused by increased visitor numbers? – support the visitor economy?
3. Equalities	<p>Advance equality for all.</p>	<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?
4. Transport and Air Quality	<p>Reduce the need to travel by private car, reduce traffic congestion and air pollution through improving travel choice by active encouragement of modal shift and facilitation of more sustainable forms of transport.</p>	<ul style="list-style-type: none"> – 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?

IIA theme	IIA Objective	Appraisal questions: Will the option/proposal help to...
5. Climate Change	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? - 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?
	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?
6. 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?
	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?
7. 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 Area of Outstanding Natural Beauty?

IIA theme	IIA Objective	Appraisal questions: Will the option/proposal help to...
8. 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?
	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"> o identify the most beneficial locations for tree planting? o assess how development projects can best contribute to natural capital locally? o identify blue/green infrastructure opportunities?
9. 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?
10. 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?
	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?
	Encourage the prudent use of natural resources.	<ul style="list-style-type: none"> - avoid sterilisation of identified mineral resource areas?
	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?

3. Options considered as reasonable alternatives at the current stage

Reasonable alternatives

3.1 A key element of the IIA process is the appraisal of 'reasonable alternatives' for the LPU. The SEA Regulations¹⁰ are not prescriptive as to what constitutes a reasonable alternative, stating only that the IIA Report should present an appraisal of the "*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*".

Key policy themes

3.2 The aim of the current Issues and Options consultation is to gain stakeholders' views on the approach LPU policies can take on various key planning issues. In response to this, the consultation sets out a number of potential approaches for a range of different topics associated with the LPU. These include the following topics:

- Responding to the Climate Crisis.
- Accessibility of New Housing Development.
- Biodiversity.
- Design.
- Economy and Employment.
- Green Infrastructure.
- Health, Social and Cultural Wellbeing.
- Historic Environment.
- Housing Affordability.
- Housing Need, Requirement, Land Supply and Delivery.
- Infrastructure.
- Landscape.
- Natural Capital and Ecosystem Services.
- Neighbourhood Development Plans.
- Retail and Town Centres.
- Sustainable Tourism.
- Sustainable Transport and Air Quality.
- Water Quality, Water Resources and Flooding.

3.3 For each of these topics, a Topic Paper has been prepared, designed to inform the consultation. These can be accessed on the Issues and Option consultation webpage at:

<https://issuesandoptions.commonplace.is/>

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

Options appraised through the IIA

- 3.4 With a view to informing the consultation on the Issues and Options, the IIA process has appraised a number of alternative policy approaches that can be taken through the LPU.
- 3.5 This has focused on the elements of the topics above where realistic choices can be made and which have the potential to have significant effects. This enables the relative sustainability merits of the different approaches that can be taken to important planning policy considerations to be explored.
- 3.6 In this context, options have been considered for the following issues:
- Biodiversity.
 - Zero carbon development.
 - Carbon storage calculations.
 - Accessibility.
 - Renewable energy provision outside of the AONB.
 - Renewable energy provision inside of the AONB.
 - Economy and employment.
 - Second homes and holiday homes.
 - Tourism.
- 3.7 Further details on these options are presented in **Chapters 4 to 12**.

Approach to the appraisal

- 3.8 The options considered as 'reasonable alternatives' have been appraised against the IIA Framework (**Table 2.1**).
- 3.9 In undertaking the appraisal, the proposed options were reviewed to determine the likelihood of positive or negative effects under each IIA theme. Where a causal link between the options and IIA themes was established, impacts were identified on the basis of professional judgment with reference to the evidence base. The appraisal was undertaken with reference to the criteria in Schedule 1 of the SEA Regulations.
- 3.10 The following chapters therefore:
- Discuss the key themes considered through this stage of the IIA process;
 - Provide detail on the options considered as reasonable alternatives for each theme; and
 - Present the appraisal findings relating to each set of options developed for each theme.

4. Options relating to biodiversity

- 4.1 At present, Biodiversity Net Gain is required by local and national planning policy. In this respect the Environment Act, which received Royal Assent in November 2021, requires all development schemes in England to deliver a mandatory 10% biodiversity net gain to be maintained for a period of at least 30 years.
- 4.2 An alternative approach would be to explore the possibility of extending the 10% provision through introducing a requirement through the LPU that at least a 20% figure for biodiversity net gain on development sites is delivered.
- 4.3 To explore this issue further, the IIA has considered two options, as follows:
- **Option BNG1:** Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).
 - **Option BNG2:** Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.
- 4.4 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.
- 4.5 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the less favourable ranking. **Figure 4.1** subsequently presents a visual summary of the findings.

Table 4.1: Appraisal of options relating to biodiversity net gain

Option BNG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).

Option BNG2: Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		BNG 1	BNG 2
Healthy and Vital Communities	<p>Attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm.</p> <p>'Green' neighbourhoods are also more desirable places to live; this is reflected by access to green space being found to markedly increase property values.¹¹</p> <p>In this respect Option BNG2 has the potential to deliver additional benefits for health and wellbeing, the quality of neighbourhoods and for community vitality.</p> <p>Biodiversity is of intrinsic value to people through supporting healthy lifestyles, however development often makes a significant contribution to land use change and to the loss of natural habitats that reduces biodiversity.¹² The 25 Year Environment Plan recognises this, acknowledging that there is unequal access to</p>	2	1

¹¹ The Office for National Statistics (2019) estimates that green and blue space add £2,813 to the price of the average house in Great Britain, and this is likely to increase in light of COVID-19 and the increased value placed on accessible green space. ONS (2019) Urban green spaces raise nearby house prices by an average of £2,500 [online] available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/urbangreenspacesraisenearbyhousepricesbyanaverageof2500/2019-10-14>

¹² RSPB (2016) State of Nature UK Report [online] available at <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/state-of-nature/state-of-nature-uk-report-2016.pdf>

nature and green spaces, and therefore sets out commitments to better connect people with the environment to improve health and wellbeing.¹³ It is therefore considered that delivering at least a 20% net gain (Option BNG2) provides an increased opportunity to facilitate the wider social and wellbeing benefits that healthy ecosystems offer.

A 20% net gain requirement may also encourage developers to take a strategic approach to protecting, restoring and creating quality habitat that contributes towards a network of multifunctional green infrastructure. This can have significant wellbeing benefits, including providing open space, leisure and recreational opportunities which in turn support healthy and active lifestyles. Numerous mental and physical health benefits can be anticipated as a result; with the potential for significant positive effects in the long-term.

Housing	<p>The delivery of additional levels of net gain through Option BNG2 has the potential to lead to improved residential environments.</p> <p>From a development viability perspective, Option BNG1 seeks a requirement for biodiversity net gain which is in line with minimum requirements and is therefore not expected to have adverse impacts on housing development and infrastructure delivery. Under Option BNG2, there is potential for this stricter requirement to affect the viability of new developments, potentially reducing the overall rate of housing and employment delivery. The implications of net gain on the viability of development is likely to be disproportionate for certain development types, for example public service infrastructure and redevelopment of post-industrial developed land.¹⁴ Risks are uncertain.</p> <p>While further evidence is required to understand the scale of the risk involved, it is noted that elsewhere Lichfield District Council requires a net gain of 20% on new development, and experience there to date suggests that developers are able to meet this requirement and often achieve much greater levels of biodiversity net gain.</p>	=	=
Economy and Employment	<p>Attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm. 'Green' neighbourhoods are also more desirable places to live, with access to green space found to markedly increase property values. Wider benefits to the economy are similarly high, with biodiversity being a significant contributor to the economy. In this respect Cotswold District's various habitats and wildlife, whether found in urban or rural greenspaces, bring substantial economic value through tourism and leisure, and indirectly supporting food production and agriculture.¹⁵</p>	2	1
Equalities	<p>Increased 'greening' of developments facilitated by Option BNG2 will support the quality of the built environment and neighbourhoods as places to live and work, and support community vitality. It will also support physical and mental health and wellbeing. This will support the needs of all groups, including those groups with protected characteristics.</p>	2	1
Transport and Air Quality	<p>Whilst with regards to Option BNG2, the increased provision of green infrastructure that will be utilised in developments to facilitate a 20% net gain in biodiversity has the potential to enhance and</p>	2	1

¹³ Department for Environment, Food and Rural Affairs (2019) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

¹⁴ Department for Environment, Food and Rural Affairs (2019) Net gain: Summary of responses and government responses [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf

¹⁵ Ecological Expertise, Evolved (Building Biodiversity Net Gain into Housing https://assets.website-files.com/5e5fb414845bab39bfd2015f/5e6809ce13930fcb39f12bce_EPR-Report-NetGain-v01-compressed.pdf)

improve the quality of walking and cycling networks, the relative merits of each option in this regard are likely to be negligible.

With respect to air quality, whilst Option BNG1 will provide benefits, Option BNG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG). In this respect the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution, including particulate matter, sulphur dioxide, nitrogen dioxide and ozone. BNG can also deliver air quality benefits at the microscale. For example, the introduction of green walls and roofs trap pollutants which in turn deliver cleaner air.

As such, an increased requirement for net gain through Option BNG2 has additional potential to lead to positive effects in relation to air quality.

Climate Change	As highlighted by the NPPF, well planned green infrastructure can help an area adapt to, and manage the risks of climate change (including flood risk). In addition, green infrastructure provision can support climate change mitigation through enhancing natural features which act as carbon sequesters. In this respect, Option BNG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG).	2	1
Historic Environment	Delivering net gains in biodiversity can have beneficial impacts in terms of the built environment, and by extension, the setting of the historic environment. With regards to Option BNG2, the increased provision of green infrastructure that will be utilised in developments to facilitate a 20% net gain in biodiversity has the potential to enhance and improve the quality of the public realm. In this respect enhancements to the built and natural environment supported by BNG has the potential to support the setting of the historic environment and contribute to historic landscape character. While positive effects in this respect may be delivered through Option BNG1, these are likely to be less significant than the benefits under Option BNG2. It should be noted though that habitat restoration and new habitat creation may have negative impacts (direct and indirect) on the significance of heritage assets including their settings. For example, heathland restoration can have impacts on archaeology. In addition, localised ecologies, which reflect historic character, should be considered for protection where possible. Care needs to be taken with the location, species and sizes of any new planting to avoid negative impacts, e.g. to archaeological sites or the setting of a listed building, or to minimise these and maximise opportunities for enhancement. Planting and other types of habitat restoration and re-creation will need to be informed by appropriate research and historic environment/landscape character assessments. In this respect a 20% net gain target may in some cases be inappropriate for some areas with significant historic environment value. For this reason, appropriate methods for biodiversity net gain should therefore be devised with input from historic environment specialists from the outset.	2	1
Landscape	Delivering net gains in biodiversity has the potential to help conserve and enhance landscape character, including its special qualities and sense of place. For example, enhanced habitats (trees, hedgerows, grass, shrubs, etc.) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. They can also play a role in contributing towards local distinctiveness and a sense of place. While positive effects in this respect may be delivered through	2	1

Option BNG1, these are likely to be less significant than the benefits under Option BNG2.

However, it is recognised that BNG needs to be appropriately designed to reinforce the special qualities of a landscape. The design of BNG will therefore need to be sensitive to the surrounding landscape, and exercises in habitat restoration and creation should be carefully selected to complement existing character and setting.

<p>Green Infrastructure and Natural Capital</p>	<p>Biodiversity 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 support flood risk management through the provision of permeable surfaces and the introduction of sustainable drainage systems (SuDS). Option BNG2 is therefore likely to perform most positively in this respect. given its increased net gain requirement. Through delivering an enhanced range of natural capital assets, the approach will help increase the range of ecosystem services provided by new development areas.</p>	<p>2 1</p>
<p>Biodiversity</p>	<p>BNG approaches include habitat creation and avoided habitat loss, notably through steering development towards the least environmentally damaging areas and design practice. Through introducing a 20% net gain requirement, Option BNG2 would therefore contribute most positively towards the 25 Year Environment Plan's¹⁶ commitment to protecting and restoring nature. In many cases a 10% uplift in biodiversity where the previous baseline is zero (for example often seen on brownfield sites) provides limited benefit. In this respect the Chartered Institute of Ecology and Environmental Management (CIEEM) argue that 10% may be within the margin of error for the valuation of habitats, and it may be too low to deliver real benefits; at most it might achieve no net loss.¹⁷ CIEEM also highlight the importance of a minimum mandatory requirement, to ensure that the Lawton principles (more, bigger, better and joined up) approach is applied, and suggest that 20% is set as this minimum requirement.¹⁸ A requirement for 10% net gain (Option BNG1) would therefore lead to greater uncertainty over whether BNG would, in practice, be achieved at the site rather than the landscape scale. 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. A requirement to demonstrate 20% net gain (Option BNG2) will likely provide greater certainty in terms of ensuring existing habitat is retained where possible and habitats and ecological connections enhanced. The obligation to deliver an increased level of net gain in biodiversity is also more likely to ensure that mitigation and compensation measures are adequately considered in relation to development, which may in some cases result in the need for offsite compensation. A stronger approach to BNG will also help to fund opportunities to work towards rebuilding the wider natural environment through the</p>	<p>2 1</p>

¹⁶ Department for Environment, Food and Rural Affairs (2019) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

¹⁷ CIEEM (2019) Defra Biodiversity Net-Gain Consultation Response Document [online] available at: <https://cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf>

¹⁸ Ibid.

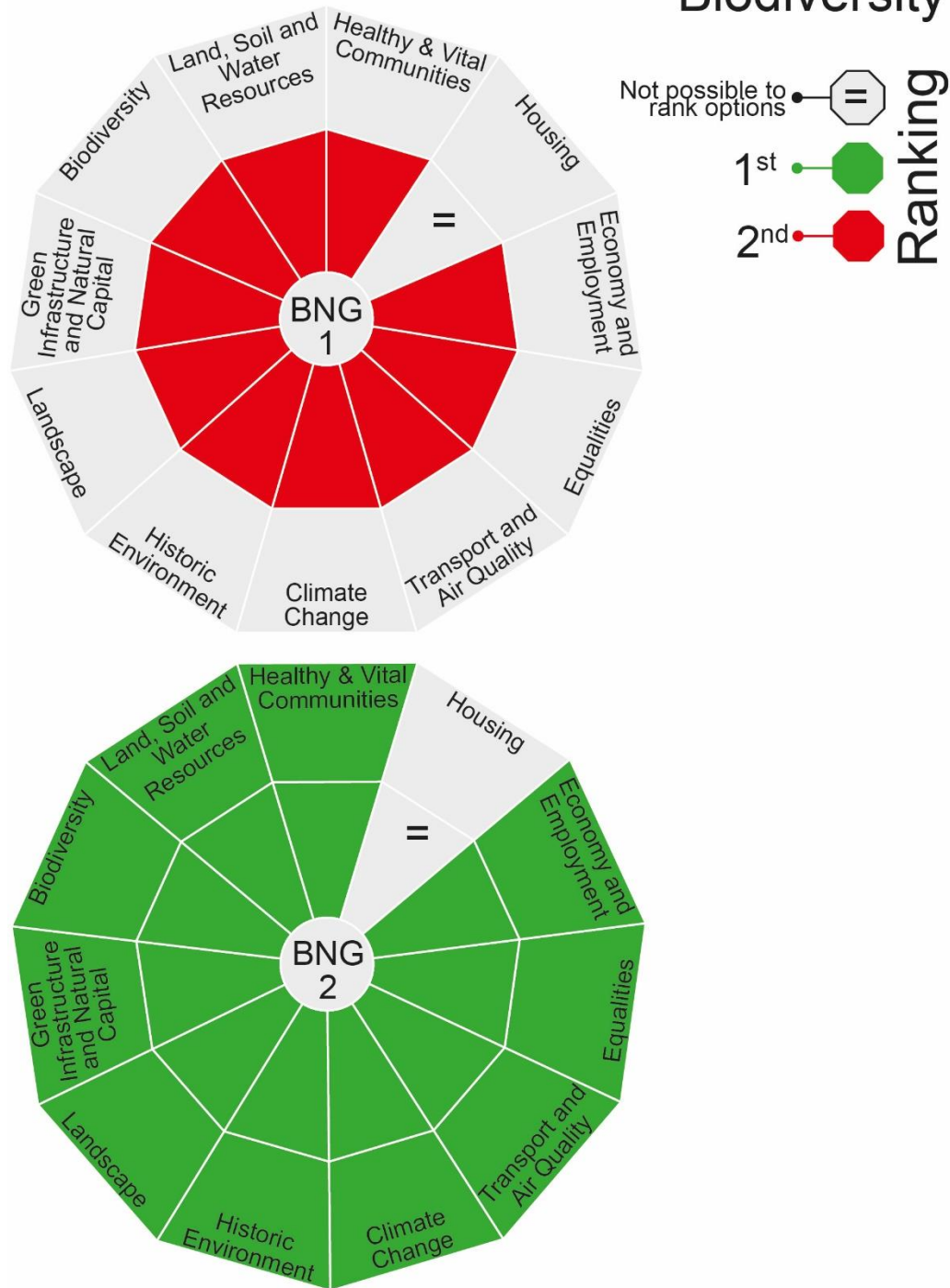
development of Nature Recovery Networks in Cotswold District, Gloucestershire and regionally.

It is noted though that the requirement to secure a minimum 20% net gain could be difficult to achieve on major development sites where the site is more ecologically sensitive, or where the loss of higher value habitats is unavoidable. This would be likely to significantly increase the demand for habitat banks and biodiversity offsetting, and may lead to disproportionate implications for the viability of particular development types.

Overall though, Option BNG2 is considered to be the best performing in terms of improving and enhancing the District's biodiversity resource.

Land, Soil and Water Resources	<p>Biodiversity 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 support flood risk management through the provision of permeable surfaces and the introduction of sustainable drainage systems (SuDS).</p> <p>Option BNG2 is therefore likely to perform most positively with regards soil and water resources in this respect given its increased net gain requirement.</p>	2	1
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Options Relating to Biodiversity



Option BNG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).

Option BNG2: Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

Figure 4.1: Summary of appraisal, options relating to biodiversity

5. Options relating to zero carbon development

- 5.1 The Cotswold Design Code is the principal Local Plan policy and source of advice on how to achieve good design in the Cotswolds, especially in terms of architectural styles and green infrastructure. Since its adoption in Aug 2018 the Code has been used to good effect and it continues to provide a firm basis upon which to determine planning applications.
- 5.2 CDC have identified that there may be a need to update the Council’s Design policy and code. In this respect there is the potential for the LPU to implement updates to the Design Code to move more quickly towards a zero carbon development requirement than currently.
- 5.3 In this respect the IIA has considered three options, as follows:
- **Option ZC1:** Continue to apply the provisions of the Cotswold Design Code as regards to zero carbon development.
 - **Option ZC2:** Update the Cotswold Design Code to introduce a new building standards policy that requires new buildings to be zero carbon, in terms of the construction and lifetime use within the plan period.
 - **Option ZC3:** Update the Cotswold Design Code which aligns the approach to zero carbon development to government policy which promote a slower and longer transition towards such development.
- 5.4 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.
- 5.5 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with ‘1’ the most favourable ranking and ‘3’ the least favourable ranking. **Figure 5.1** subsequently presents a visual summary of the findings.

Table 5.1: Appraisal of options regarding zero carbon development

Option ZC1: Continue to apply the provisions of the Cotswold Design Code as regards to zero carbon development.

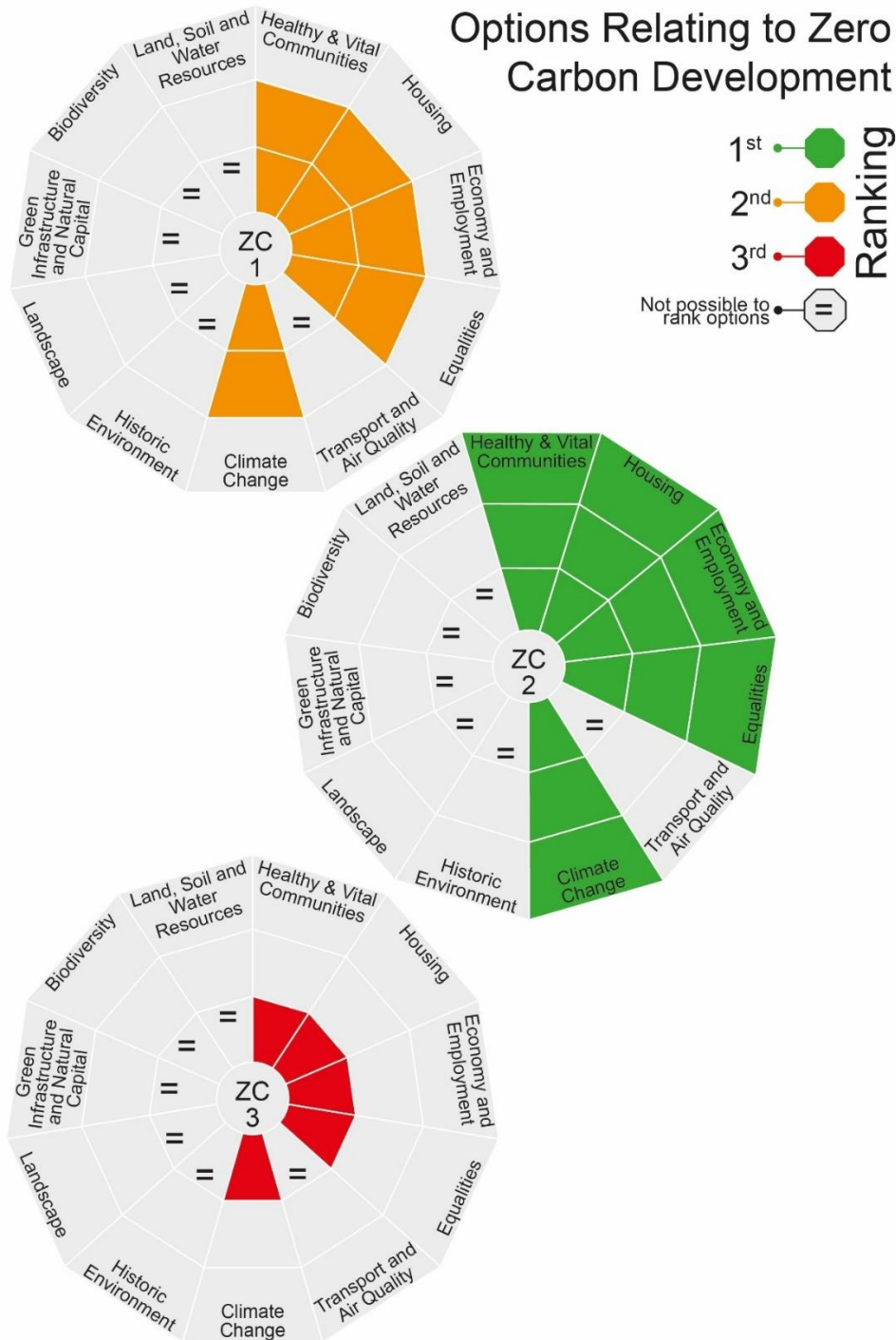
Option ZC2: Update the Cotswold Design Code to introduce a new building standards policy that requires new buildings to be zero carbon, in terms of the construction and lifetime use within the plan period

Option ZC3: Update the Cotswold Design Code which aligns the approach to zero carbon development to government policy which promote a slower and longer transition towards such development.

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		ZC1	ZC2	ZC3
Healthy and Vital Communities	<p>Option ZC2 will bring forward the timeframe for the requirement for development to be zero carbon. This has the potential to bring a range of benefits for the quality of life and health and wellbeing of residents through the delivery of higher quality, healthier and energy efficient housing. This will help tackle issues such as fuel poverty, and support a reduction in health inequalities.</p> <p>In this respect, Option ZC3 (which takes forward the Future Homes Standard and will deliver net zero housing by 2050), and to a lesser extent Option ZC1 (which continues the current District-wide approach), will do less to deliver shorter and medium-term benefits relating to these issues.</p>	2	1	3

Housing	<p>From a development viability perspective, Option ZC2, through bringing forward a date for the delivery of zero carbon development, may affect the delivery of housing. However, this should be seen in the context of other requirements, including affordable housing need, accessibility standards, BNG and other elements, and the need to consider the viability 'balance', of ensuring that the cumulative impact of policy does not put future development at risk. In this respect, this issue will need to be seen in the context of the wider policy provisions of the LPU. However, bringing the forward of a net zero requirement through Option ZC2 will support the delivery of higher quality, healthier and energy efficient housing.</p>	2	1	3
Economy and Employment	<p>Bringing forward a net zero requirement through Option ZC2 has the potential to support the green economy through encouraging the use of energy efficient design and building techniques, as well as encouraging innovate approaches relating to elements such as district heating, renewable energy provision and environmentally sustainable development.</p>	2	1	3
Equalities	<p>Option ZC2 will bring forward the timeframe for the requirement for development to be zero carbon. This has the potential to bring a range of benefits for the quality of life and health and wellbeing of residents through the delivery of higher quality, healthier and energy efficient housing. This will help tackle issues such as fuel poverty, and support a reduction in health inequalities. This has the potential to have particular benefits for equalities groups with protected characteristics.</p> <p>In this respect, Option ZC3 (which takes forward the Future Homes Standard and will deliver net zero housing by 2050), and to a more limited extent Option ZC1 (which continues the current District-wide approach), will do less to deliver shorter and medium-term benefits relating to these issues.</p>	2	1	3
Transport and Air Quality	<p>Given the options focus on the timeframes for introducing zero carbon development within new development, and not on wider elements such as accessibility, green infrastructure provision or other elements directly related to the IIA theme, the options are unlikely to perform significantly differently on transport and air quality issues. It is recognised though that the delivery of infrastructure associated with zero carbon development may support the use of sustainable modes of transport however.</p>	=	=	=
Climate Change	<p>With regards to climate change mitigation, the bringing forward of the timeframe for the requirement for development to be zero carbon will support a limitation of greenhouse gas emissions from housing, employment and other uses. In this respect Option ZC2 will do more to deliver benefits in a shorter time period than Options ZC1 and ZC3.</p> <p>In terms of adaptation to the effects of climate change, given the options focus on limiting greenhouse gas emissions rather than adaptation, it is not possible to immediately differentiate between the options. This will instead depend on elements such as the location, design and layout of new development, and the integration of green infrastructure provision and sustainable drainage systems within new development areas.</p>	2	1	3

Historic Environment	The impact of the options in relation to this IIA theme depends on the location, design and layout of new development in the context of the significance of local assets of historic environment interest, and the extent to which proposals supports the rejuvenation of heritage assets. Given the options focus on the timeframes for introducing a requirement for zero carbon development, it is not possible to differentiate between the options in this regard.	=	=	=
Landscape	The impact of the options in relation to the Landscape IIA theme depends on aspects such as location, design and layout of development and the integration of green infrastructure provision. Given the options focus on the timeframes for introducing a requirement for zero carbon development, it is not possible to differentiate between the options in this regard.	=	=	=
Green Infrastructure and Natural Capital	It is not possible to differentiate between the options in relation to this IIA theme given the options focus on the timeframes for zero carbon development, rather than on the 'greening' of development (although it is recognised that infrastructure associated with zero carbon development may support enhanced green infrastructure provision).	=	=	=
Biodiversity	The impact of the options on habitats, species and ecological networks depends on the location, design and layout of development and the integration of green infrastructure provision. It is therefore not possible to differentiate between the options given they focus on the timeframes for introducing a requirement for zero carbon development (although it is recognised that infrastructure associated with zero carbon development may support enhanced green infrastructure provision).	=	=	=
Land, Soil and Water Resources	It is not possible to differentiate between the options in relation to this IIA theme. This is given the sustainability performance of the options depends on elements such as the extent of the loss of productive agricultural land, the integration of measures which support water quality, and impacts on minerals resources. It is therefore not possible to differentiate between the options given they focus on the timeframes for introducing a requirement for zero carbon development.	=	=	=



Option ZC1: Continue to apply the provisions of the Cotswold Design Code as regards to zero carbon development.

Option ZC2: Update the Cotswold Design Code to introduce a new building standards policy that requires new buildings to be zero carbon, in terms of the construction and lifetime use within the plan period.

Option ZC3: Update the Cotswold Design Code which aligns the approach to zero carbon development to government policy which promote a slower and longer transition towards such development.

Figure 5.1: Summary of appraisal, options regarding zero carbon development

6. Options relating to carbon storage calculations

- 6.1 There is a need to prevent the loss of carbon storage in the natural environment through new development. As such, it may be appropriate to consider the introduction of a policy which seeks to ensure the extent to which a new development affects the existing carbon storage of habitats on site is robustly evaluated.
- 6.2 In response to this, the IIA has considered the following options:
- **Option CS1:** Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development.
 - **Option CS2:** Do not utilise a Carbon Storage Calculation to compare the carbon storage capacity of habitats on the site before and after development (business as usual).
- 6.3 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.
- 6.4 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the less favourable ranking. **Figure 6.1** subsequently presents a visual summary of the findings.

Table 6.1: Appraisal of options regarding the application of a Carbon Storage Calculation

Option CS1: Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development

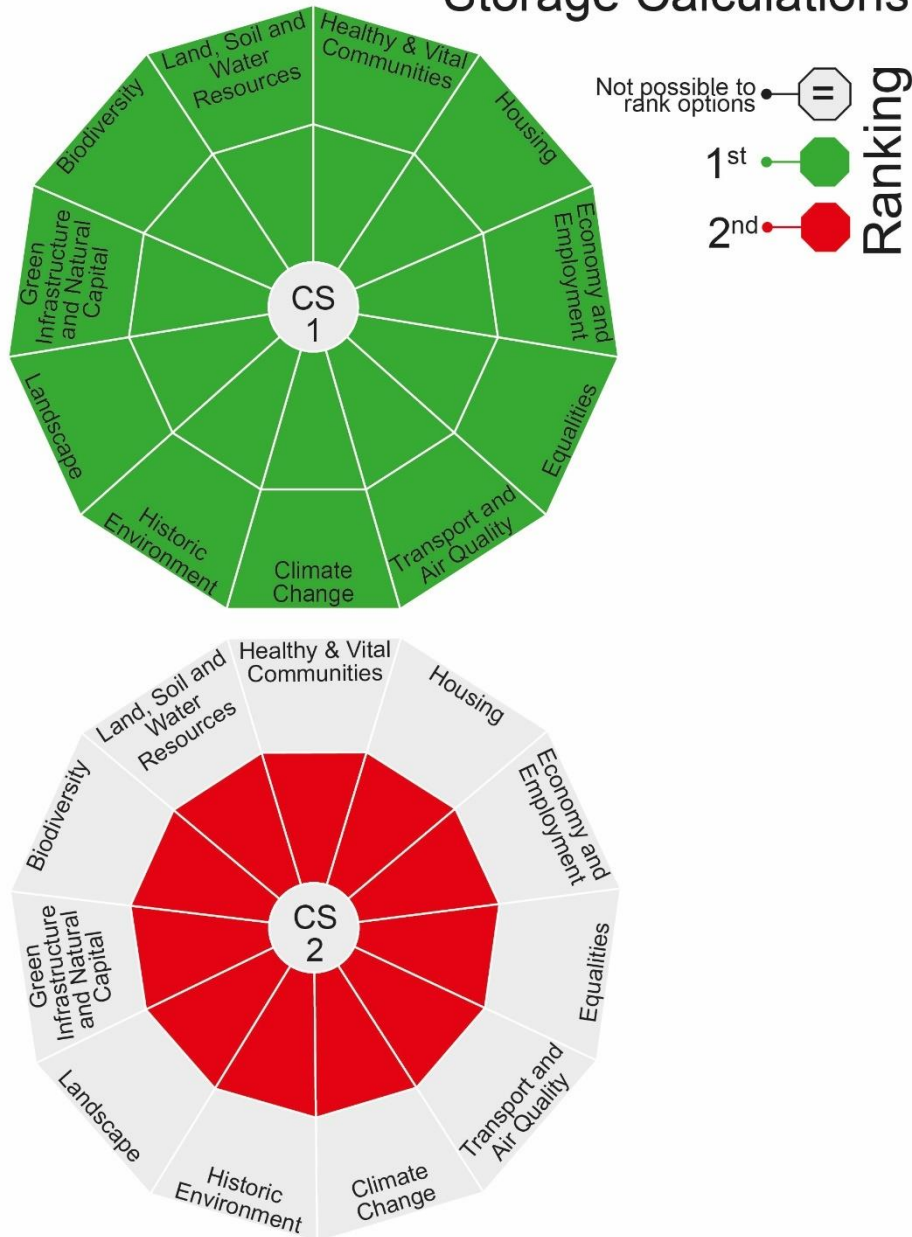
Option CS2: Do not utilise a Carbon Storage Calculation to compare the carbon storage capacity of habitats on the site before and after development (business as usual)

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		CS1	CS2
Healthy and Vital Communities	Option CS1, through introducing the use of a Carbon Storage Calculation, has more potential than the business as usual option (CS2) to deliver development areas with increased planting, use of trees and other green infrastructure provision. This will help deliver higher quality built environments. This will support the liveability of neighbourhoods and promote physical and mental health and wellbeing.	1	2
Housing	Option CS1, through introducing the use of a Carbon Storage Calculation, has the potential to deliver development areas with increased planting, use of trees and other green infrastructure provision. This will help deliver higher quality residential environments. Whilst the approach may have some impacts on the viability of new development, the option will do more than the business as usual option (Option CS2) to support the quality of housing in the District.	1	2
Economy and Employment	There is unlikely to be a significant difference between the options. However, Option CS1, through supporting the quality of neighbourhoods, may promote community and economic vitality and support the visitor economy.	1	2
Equalities	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will support the quality of the built environment and neighbourhoods as places to live and work, and	1	2

support community vitality. This will support the needs of all groups, including those groups with protected characteristics.

Transport and Air Quality	Improvements in the quality of neighbourhoods facilitated by increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator. This has the potential to encourage the use of active modes of travel (including walking and cycling). In addition to benefitting air quality through modal shift, the option will also have positive effects on air quality though facilitating increased absorption and dissipation of nitrogen dioxide, particulate matter and other pollutants from transport.	1	2
Climate Change	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will have positive effects on climate change mitigation by safeguarding and enhancing carbon sequestrators (e.g. trees and hedgerows) within the townscape and landscape. With regards to climate change adaptation, green infrastructure provision will help also positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and reducing surface water run-off. In addition, increased planting and green infrastructure provision and associated improvements to the built environment will encourage lower carbon modes of travel, in particular walking and cycling.	1	2
Historic Environment	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will help improve the setting of the historic environment through facilitating the delivery of a high quality built environment and public realm.	1	2
Landscape	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will help support landscape, townscape and villagescape character through supporting the delivery of a high quality public realm.	1	2
Green Infrastructure and Natural Capital	Option CS1, through facilitating the use of a Carbon Storage Calculator, is likely to deliver development areas with an increased level of planting, trees and other green infrastructure provision. Through delivering an enhanced range of natural capital assets, the approach will help increase the range of ecosystem services provided by new development areas, including associated with a wider range of provisioning, regulating, supporting and cultural services.	1	2
Biodiversity	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will support habitats, species and ecological networks. In this respect Option CS1 has more potential than the business as usual approach proposed by Option CS2 to support biodiversity in the District.	1	2
Land, Soil and Water Resources	Option CS1, through facilitating the use of a Carbon Storage Calculator, is likely to deliver development areas with an increased level of planting, trees and other green infrastructure provision. This will do more than Option CS2 to support soil and water quality through helping to support the capacity of the built environment to manage surface water run-off, and regulate soil and water quality.	1	2

Options Relating to Carbon Storage Calculations



Option CS1: Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development.

Option CS2: Do not utilise a Carbon Storage Calculation to compare the carbon storage capacity of habitats on the site before and after development (business as usual).

Figure 6.1: Summary of appraisal, options relating to carbon storage calculations

7. Options relating to the accessibility of new housing development

- 7.1 The existing Local Plan policies support many of the principles of sustainable transport provision. However, in light of the declaration of a climate emergency, and increasing challenges in delivering modal shift from the private car, there may be a need to consider additional Local Plan provisions relating to accessibility and sustainable transport use. A more stringent application of accessibility standards may however have unforeseen knock-on effects.
- 7.2 In this respect the IIA has explored the implications of bringing forward additional transport accessibility standards for new housing development through considering the following three options:
- **Option TR1:** Continue with the current policy provisions of the Local Plan with regards to transport and accessibility (business-as-usual).
 - **Option TR2:** Introduce minimum accessibility requirements for new residential development sites.
 - **Option TR3:** Introduce modal share and vehicle generation targets for new residential development sites.
- 7.3 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.
- 7.4 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking. **Figure 7.1** subsequently presents a visual summary of the findings.

Table 7.1: Appraisal of options regarding the accessibility of new development

Option TR1: Continue with the current policy provisions of the Local Plan with regards to transport and accessibility (business-as-usual).

Option TR2: Introduce minimum accessibility requirements for new residential development sites.

Option TR3: Introduce modal share and vehicle generation targets for new residential development sites.

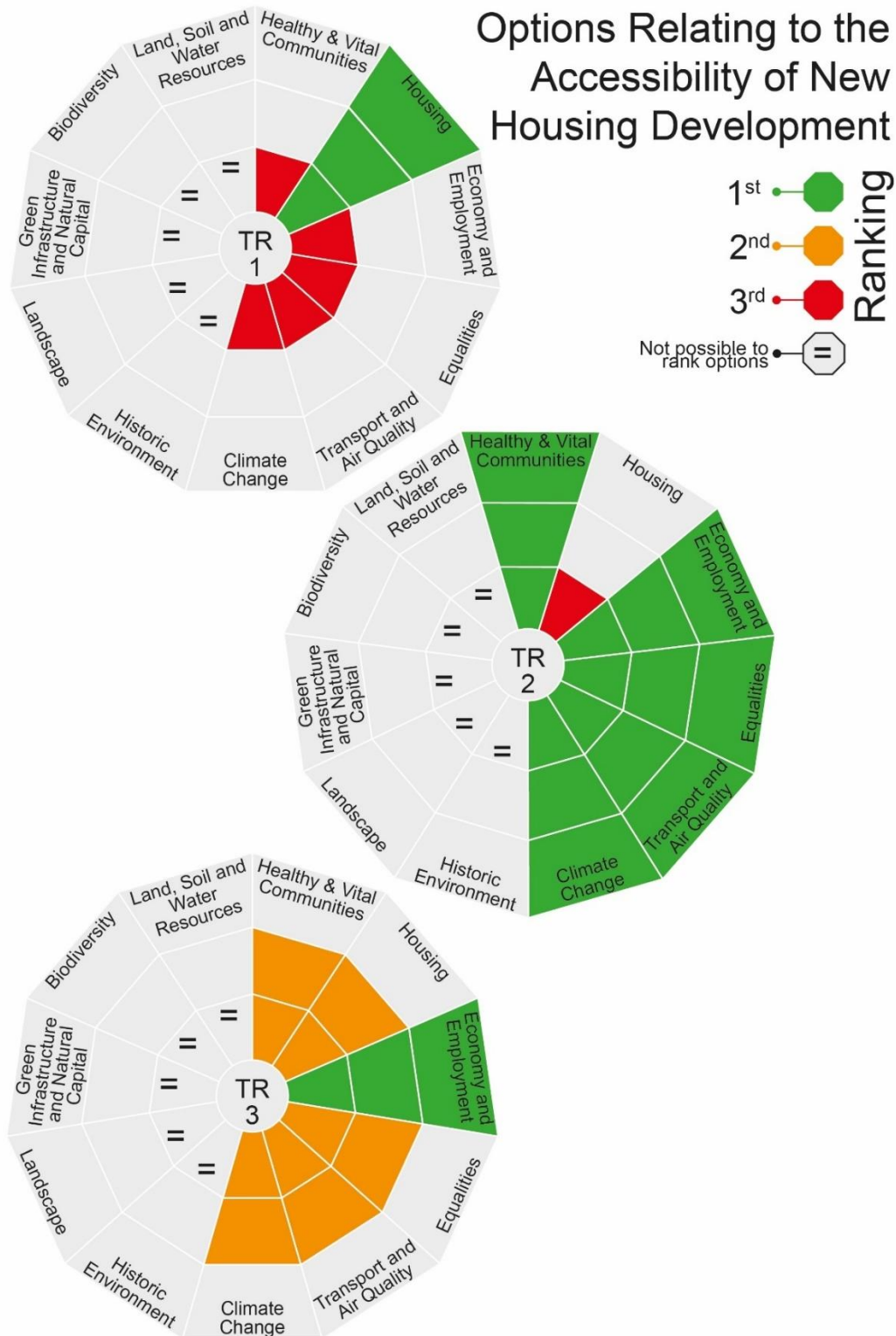
IIA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		TR1	TR2	TR3
Healthy and Vital Communities	Accessibility to services and facilities is a key contributor to the quality of life of residents. Well located development can also support community vitality through supporting existing amenities and an expansion of community offer. In this respect Option TR2 has the potential to deliver additional benefits for accessibility through introducing minimum accessibility requirements. Option TR3, through introducing modal share and vehicle generation targets, will also do more than the current Local Plan approach to support accessibility via sustainable modes of travel. However, given the option does not seek to directly ensure that development is in an accessible location it is less likely to be effective with regards to delivering growth which reduces the need to travel to key amenities. It does however provide opportunities for enhancing accessibility from the currently less accessible locations in the District.	3	1	2
Housing	Options TR2 and TR3 have the potential to support the delivery of housing which is in accessible locations. However, given housing availability and affordability issues are often most	1	3	2

significant in the less accessible rural areas of the District, the options may do less to deliver housing in these locations with significant need. As such, there would need to be a recognition that an approach which directs housing to more accessible locations does not overlook the significant housing needs which exist in the less accessible parts of the District.

Economy and Employment	<p>Service centres, which have the largest concentration of facilities and amenities and public transport networks, tend to be the most accessible locations in the District. In this respect, Option TR2, through directing growth to these more accessible locations, has the potential to reinforce the economic vitality of service centres through supporting existing amenities and facilitating an expansion of community offer in these locations. The option therefore has the potential to deliver additional benefits for economic vitality and the viability of economic activities in existing centres.</p> <p>Option TR3, through introducing modal share and vehicle generation targets will help support sustainable modes of travel. However, the option does not seek to ensure that development is in an accessible location at the outset. As such it is less likely than Option TR2 to be as effective with regards to accessibility to economic opportunities. It does however provide opportunities for enhancing accessibility to economic opportunities from the currently less accessible locations in the District.</p>	3	1=	1=
Equalities	<p>Accessibility to services and facilities is a key contributor to social inclusion. In this respect Option TR2, through delivering growth in more accessible locations, will support the needs of all groups, including those with protected characteristics. Option TR3, through introducing modal share and vehicle generation targets for new development, will also help ensure that amenities are accessible by those without access to a private car.</p> <p>As discussed under the Housing IIA theme, the approach put forward by Option TR2 may however do less to support the housing needs of groups with protected characteristics in less accessible rural areas of the District.</p>	3	1	2
Transport and Air Quality	<p>With regards to air quality, Option TR2 has the most potential to deliver growth in locations accessible to services, facilities and opportunities via sustainable modes of transport including active travel modes and public transport. It also has the potential to deliver growth in locations in closer proximity to key amenities. This will help reduce the need to travel. In this respect, Option TR2 will do the most to support a limitation of emissions from transport, and to benefit air quality.</p> <p>Option TR3 will also support the use of sustainable modes of transport; however, it will do less to deliver growth in locations which will reduce the need to travel than Option TR2.</p>	3	1	2
Climate Change	<p>With regards to climate change mitigation, Options TR2 and TR3 will help reduce emissions from transport through encouraging the use of sustainable modes of transport to and from new development areas. Option TR2, through delivering growth in more accessible locations with a wider range of services and facilities, will further help limit emissions through reducing the need to travel to key amenities.</p>	3	1	2
Historic Environment	<p>The impact of the options in relation to this IIA theme depends on the location, design and layout of new development in the context of the significance of local assets of historic environment interest, and the extent to which proposals supports the</p>	=	=	=

rejuvenation of heritage assets. It is therefore not possible to differentiate between the options in this regard.

Landscape	The impact of the options in relation to the Landscape IIA theme depends on aspects such as location, design and layout of development and the integration of green infrastructure provision. As such, it is not possible to differentiate between the options in this regard.	=	=	=
Green Infrastructure and Natural Capital	It is not possible to differentiate between the options in relation to this IIA theme. This is given effects depend on the integration of green infrastructure provision within new development areas and the extent to which they support increased flows of ecosystem services.	=	=	=
Biodiversity	The impact of the options on habitats, species and ecological networks depends on the location, design and layout of development and the integration of green infrastructure provision. It is therefore not possible to differentiate between the options.	=	=	=
Land, Soil and Water Resources	It is not possible to differentiate between the options in relation to this IIA theme. This is given the sustainability performance of the options depends on elements such as the extent of the loss of productive agricultural land, the integration of measures which support water quality, and impacts on minerals resources.	=	=	=



Option TR1: Continue with the current policy provisions of the Local Plan with regards to transport and accessibility (business-as-usual).

Option TR2: Introduce minimum accessibility requirements for new residential development sites.

Option TR3: Introduce modal share and vehicle generation targets for new residential development sites.

Figure 7.1: Summary of appraisal, options relating to the accessibility of new housing development

8. Options relating to renewable energy provision outside of the AONB

- 8.1 The Local Plan is supportive in principle to the delivery of renewable energy provision in the District. In this respect existing policy allows consideration of renewable energy developments if the degree of harm is deemed acceptable in proportion to the importance of that landscape.
- 8.2 A number of the areas potentially suitable for renewable energy provision outside of the AONB however have the potential to be sterilised by development, including housing and employment provision. In this respect there may be scope for the Local Plan update to safeguard areas suitable for wind energy development.
- 8.3 On this basis the IIA has considered the following two options:
- **Option WE1:** Outside of the AONB, safeguard areas identified as suitable locations for the delivery of renewable energy.
 - **Option WE2:** Outside of the AONB, do not seek to safeguard suitable areas outside for renewable energy (business-as-usual).
- 8.4 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.
- 8.5 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the less favourable ranking. **Figure 8.1** subsequently presents a visual summary of the findings.

Table 8.1: Appraisal of options relating to renewable energy outside of the AONB

Option WE1: Outside of the AONB, safeguard areas identified as suitable locations for the delivery of renewable energy.

Option WE2: Outside of the AONB, do not seek to safeguard suitable areas outside for renewable energy (business-as-usual).

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		WE1	WE2
Healthy and Vital Communities	Option WE1 has the potential to support increased provision of renewable energy by improving certainty for applicants and therefore their willingness to make applications, with associated benefits for communities. In this respect financial contributions from developers and investments in community projects will support the development of social capital; it is recognised that projects supported by community funds originating from wind energy for example have been wide ranging, and brought numerous benefits for local communities where they have been engaged. Through safeguarding areas for renewable energy, Option WE1 may reduce the availability of land for housing, employment and associated infrastructure. The effects are however unlikely to be significant given the wider availability of the land in the District for other uses compared with suitable areas for renewable energy.	1	2
Housing	Through safeguarding areas for renewable energy, Option WE1 may reduce the availability of land for housing delivery. The effects are however unlikely to be significant given the wider availability of the land in the District for housing compared with suitable areas for renewable energy.	2	1

Economy and Employment	Both options are expected to lead to positive effects in relation to jobs and the local economy due to the investment and employment opportunities that are likely to arise from renewable energy development. However, Option WE1 has the potential to support increased provision of renewable energy by improving certainty for applicants and therefore their willingness to make applications, with associated benefits for employment and economic opportunities from renewable energy provision.	1	2
Equalities	Option WE1 has the potential to support increased provision of renewable energy by improving certainty for applicants and therefore their willingness to make applications, with associated benefits for communities. In this respect financial contributions from developers and investments in community projects will support the development of social capital; it is recognised that projects supported by community funds originating from wind energy for example have been wide ranging, and brought numerous benefits for local communities where they have been engaged. As such, Option WE1 may offer increased opportunities for groups with protected characteristics than Option WE2.	1	2
Transport and Air Quality	It is not possible to differentiate between the options in relation to this IIA theme given impacts would depend on location and scale of renewable energy provision.	=	=
Climate Change	Option WE1 has the potential to support increased provision of renewable energy by improving certainty for applicants and therefore their willingness to make applications. This will do more to support climate change mitigation than the business as usual option of WE2. In terms of climate change adaptation, it is not possible to differentiate between the options.	1	2
Historic Environment	Under both options, consideration will be given to the impacts of renewable energy on the historic environment, in line with NPPG (para 019), and Historic England's guidance. ¹⁹ Depending on their scale, design and prominence, a renewable energy facility within the setting of a heritage asset may cause substantial harm to the significance of the asset, as well as from direct negative impacts from the construction of renewable energy provision such as wind turbines and associated infrastructure. As such, while the Local Plan policy framework provides a level of protection to heritage assets, a 'suitable area' approach envisaged by Option WE1 development locations may not suitably mitigate against potential adverse effects. However, the identification of suitable areas is only the start of the development process, and it is considered that heritage constraints will later be considered at the planning application stage. In addition, key heritage assets would be considered through the establishment of suitable areas. In light of the above, it is not considered possible to distinguish between the options in terms of potential effects on the historic environment.	=	=
Landscape	Under both options, consideration will be given to the impacts of renewable energy on landscape character. The Local Plan approach currently requires that proposals will not have unacceptable landscape impacts (notably in and within the setting of AONBs). This is further supplemented by the provisions of the NPPG (para 022 and 023) and Natural England guidance. ²⁰ In terms of Option WE1, whilst the approach would not provide the specific location of renewable energy allocations, such an approach	=	=

¹⁹ Historic England (2020) Wind Energy [online] available at:

<https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/wind-energy/>

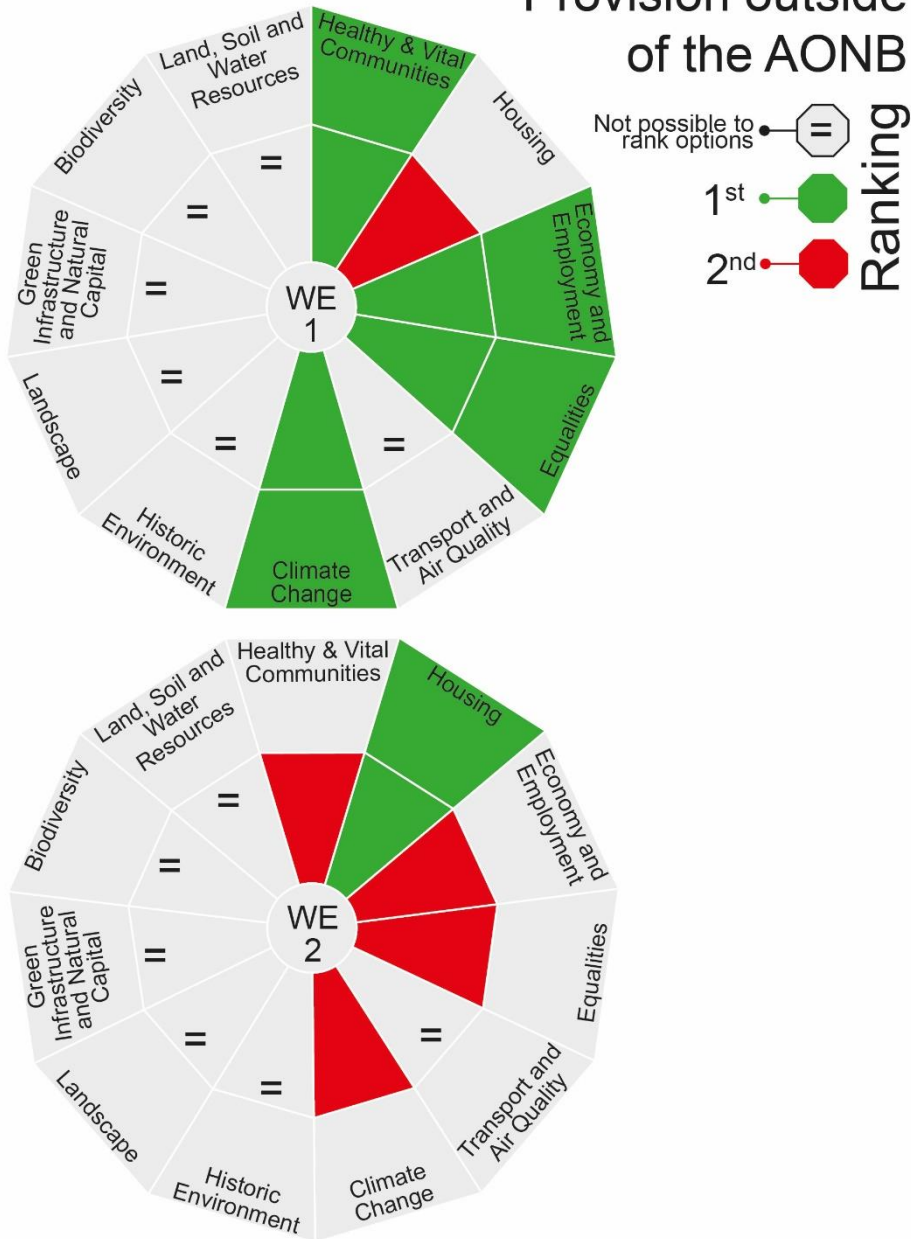
²⁰ Natural England (date unknown) Assessing On-Shore Wind Energy Development [online] available at: <http://publications.naturalengland.org.uk/file/97013>

would be informed by a detailed landscape characterisation. The identification of suitable areas is also only the start of the development process, and that landscape will be considered in detail at the later planning application stage.

In light of the above, it is not considered possible to distinguish between the options in terms of potential effects on landscape character.

Green Infrastructure and Natural Capital	It is not possible to differentiate between the options in relation to this IIA theme given impacts would depend on location and scale of renewable energy provision and the incorporation of green infrastructure and environmental net gains alongside such provision.	=	=
Biodiversity	<p>Under both options, the construction of renewable energy provision has the potential to result in habitat and species disturbance and loss. For example, wind turbine operation and maintenance may disturb sensitive species, and there is a risk of bird and bat collision with moving blades and any additional overhead wires. Geological impacts can include loss of geological exposures, damage or obscuring of geomorphological features, disruption to geomorphological processes and a range of impacts on soils. As such, effects from each option on features and areas of biodiversity and geodiversity interest largely depend on the detailed location, scale and nature of development and the incorporation of avoidance, mitigation and enhancement measures.</p> <p>The 'suitable areas' approach put forward through Option WE1 would be likely to exclude from consideration for renewable energy key internationally, nationally and locally designated biodiversity sites, and also key habitats. In addition, local planning policy provisions provide a level of protection to biodiversity, and the identification of suitable areas is only the beginning of the development process; impacts on biodiversity will be considered in more detail later at the planning application stage.</p> <p>As such it is not possible to differentiate between the options with regards to biodiversity.</p>	=	=
Land, Soil and Water Resources	It is not possible to differentiate between the options in relation to this IIA theme. It is possible that renewable energy development could result in the loss of high-quality agricultural land (until the site is restored to its previous use at the end of its lifecycle); however, it is not possible to differentiate between the options in this respect.	=	=

Options Relating to Renewable Energy Provision outside of the AONB



Option WE1: Outside of the AONB, safeguard areas identified as suitable locations for the delivery of renewable energy.

Option WE2: Outside of the AONB, do not seek to safeguard suitable areas outside for renewable energy (business-as-usual).

Figure 8.1: Summary of appraisal, options relating to renewable energy provision outside of the AONB

9. Options relating to renewable energy within the AONB

- 9.1 The Cotswolds AONB (covering 80% of the District) is a significant constraint to renewable energy development, in particular wind energy provision. However, some of the most suitable sites in the District are, from a technical viability perspective, within the more exposed locations within the AONB.
- 9.2 Within the AONB, there is a presumption against major development other than in 'exceptional circumstances' and where it can be demonstrated that the development is in the public interest.
- 9.3 Whilst significant renewable energy provision would not normally be considered appropriate for the AONB, an alternative argument is that the climate emergency constitutes an exceptional circumstance which should, to an extent, override landscape considerations.
- 9.4 As such, the IIA has explored options which consider the implications of allowing renewable energy provision, particularly wind energy provision, within the AONB.
- 9.5 In this respect, the following two options have been considered through the IIA:
- **Option AB1:** Continue with the current restrictive approach to the provision of renewable energy within the AONB.
 - **Option AB2:** Facilitate the identification of broad areas within the AONB where renewable energy might be appropriate, and looked on favourably through the planning process.
- 9.6 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.
- 9.7 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the less favourable ranking. **Figure 9.1** subsequently presents a visual summary of the findings.

Table 9.1: Appraisal of options relating to renewable energy within the AONB

Option AB1: Continue with the current restrictive approach to the provision of renewable energy within the AONB.

Option AB2: Facilitate the identification of broad areas within the AONB where renewable energy might be appropriate, and looked on favourably through the planning process.

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		AB1	AB2
Healthy and Vital Communities	<p>Option AB1, through precluding the delivery of renewable energy in the parts of the District within the AONB, has the potential to limit benefits from renewable energy for local communities in these areas. This includes associated with additional employment opportunities and wider benefits for local vitality from investment linked with renewable energy development.</p> <p>The option will also limit potential financial contributions from developers and investments in community facilities and projects. It may also preclude any potential benefits associated with community ownership, such as more significant funds for community facilities and amenities, a reduction in energy costs, increased energy autonomy and security, and increased engagement of local people more widely around the subjects of energy security, energy poverty and climate change.</p>	2	1

However, with regards to Option AB2, installation and maintenance of a renewable energy facility over its lifetime can potentially adversely impact residents through noise and traffic. Furthermore, operational noise from wind turbines could be a concern for some, particularly in rural locations where there is little background noise. Whilst it is noted that modern turbines are designed to produce very little noise, given its rurality, potential effects may have particular impacts in this regard within the AONB.

Housing	The options are unlikely to have different effects in relation to housing delivery in the District or the quality of housing.	=	=
Economy and Employment	<p>Option AB2 has the potential to support increased provision of renewable energy within the AONB by improving certainty for applicants and therefore their willingness to make applications, with associated benefits for employment and economic opportunities from renewable energy provision. This will lead to positive effects in relation to jobs and the local economy due to the investment and employment opportunities that are likely to arise from renewable energy development.</p> <p>The tourism sector is an important contributor to the local economy for the parts of the District within the Cotswolds AONB. In this respect, through enabling renewable energy provision within these areas, Option AB2 may lead to additional visual impacts from wind energy and other provision on landscape character, with potential indirect negative effects for the visitor economy. It should be noted though that significant consideration would continue to be given to the impacts of renewable energy on landscape character through this option (as discussed under the 'Landscape' IIA theme below). For this reason, renewable energy provision delivered under this option would be unlikely to be delivered in such a way that would significantly impact on the tourism interest of these areas.</p>	2	1
Equalities	<p>Option AB1, through precluding the delivery of wind energy in the parts of the District within the AONB, has the potential to limit benefits from renewable energy for local communities in these areas. This includes associated with additional employment opportunities and wider benefits for the local economy from investment linked with renewable energy development.</p> <p>The option will also limit potential financial contributions from developers and investments in community facilities and projects. It may also preclude any potential benefits associated with community ownership, such as more significant funds for community facilities and amenities, a reduction in energy costs, increased energy autonomy and security, and increased engagement of local people more widely around the subjects of energy security, energy poverty and climate change.</p> <p>In light of these factors, Option AB2 may offer increased opportunities delivering benefits for groups with protected characteristics than Option AB1.</p>	2	1
Transport and Air Quality	It is not possible to differentiate between the options in relation to this IIA theme given impacts would depend on location and scale of renewable energy provision.	=	=
Climate Change	Option AB2 has the potential to support increased provision of renewables by more readily enabling renewable energy within the parts of the District within the Cotswolds AONB. This will improve certainty for applicants and therefore their willingness to make applications. This has the potential to have a significant impact on the District's renewable energy resource given many parts of the AONB are the most suitable areas of the District in terms of technological viability for wind energy provision.	2	1

In terms of climate change adaptation, it is not possible to differentiate between the options.

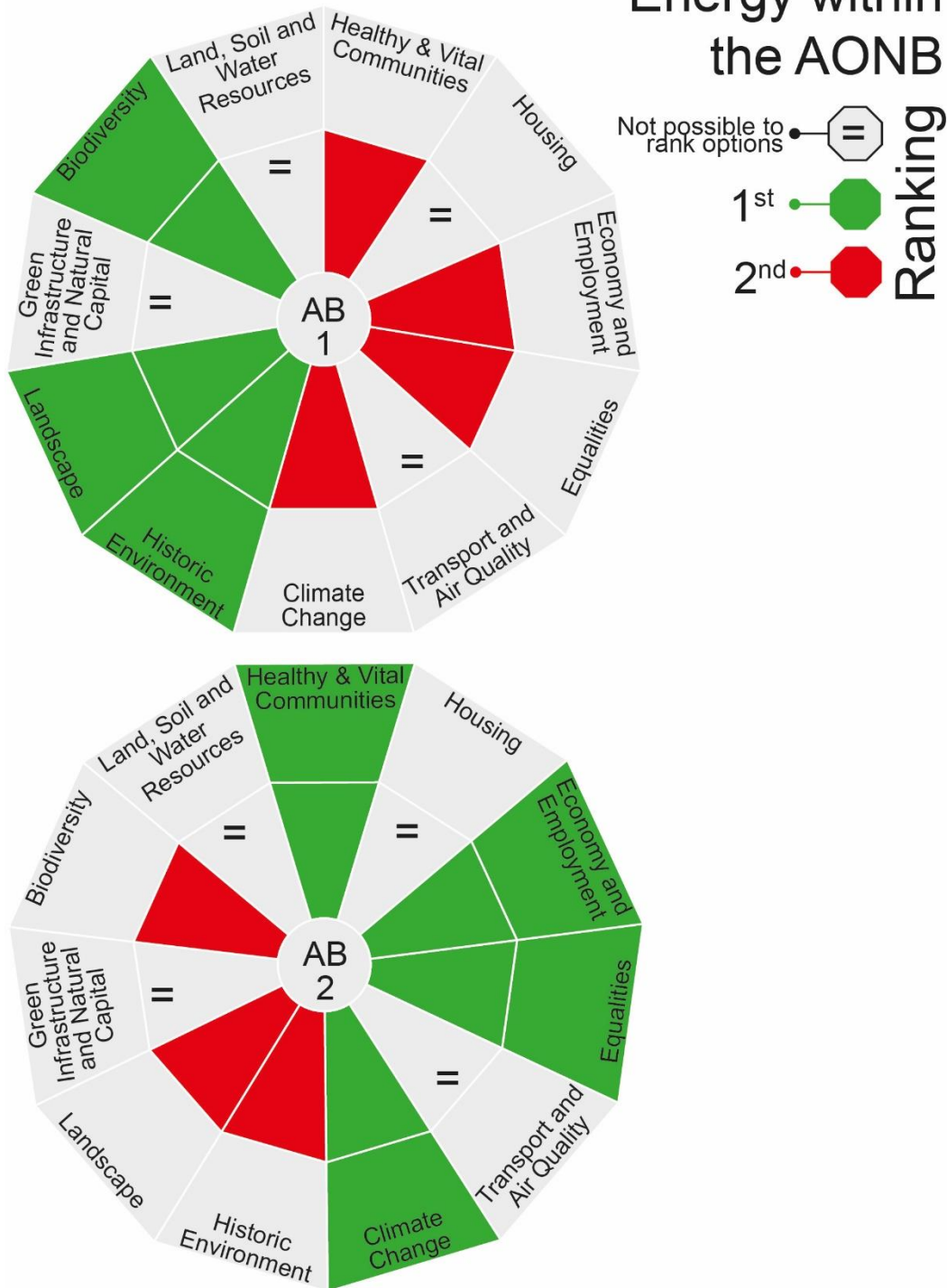
Historic Environment	<p>The special qualities of the Cotswolds AONB are underpinned by the historic environment of the area, including with regards to the historic character of the landscape, townscapes and villagescapes of the AONB. As such, through enabling renewable energy provision within the AONB, Option AB2 has the potential to have impacts on the significance of heritage assets and their settings and on the historic character of the parts of the District within and in the vicinity of the AONB.</p> <p>Under both options, consideration will be given to the impacts of renewable energy provision on the historic environment, in line with NPPG (para 019), and Historic England’s guidance.²¹</p> <p>Depending on their scale, design and prominence, a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset, as well as from direct negative impacts from the construction of wind turbines and associated infrastructure. As such, while the Local Plan policy framework provides a level of protection to heritage assets, a ‘broad area’ approach envisaged by Option AB2 may not suitably mitigate against potential adverse effects. However, the identification of suitable areas is only the start of the development process, and it is considered that heritage constraints will later be considered at the planning application stage. In addition, key heritage assets would be considered through the establishment of suitable areas.</p> <p>As such, whilst enabling renewable energy provision within the AONB through Option AB2 has the potential to lead to additional effects on the fabric and setting of the historic environment and historic character in the vicinity of the AONB, historic environment considerations would continue to be central to decision making through a broad areas approach to renewable energy.</p>	1	2
Landscape	<p>Option AB2 will enable renewable energy provision to come forward within the Cotswolds AONB. As such the approach has the potential to lead to impacts from renewable energy provision on the landscape character and special qualities of the AONB.</p> <p>Under both options, consideration will be given to the impacts of renewable energy on landscape character. The Local Plan approach currently requires that proposals will not have unacceptable landscape impacts (notably in and within the setting of AONBs). This is further supplemented by the provisions of the NPPG (para 022 and 023) and Natural England guidance.²²</p> <p>In terms of Option AB2, whilst the approach would not provide the specific location of renewable energy allocations, such an approach would be informed by a detailed landscape characterisation. It is also acknowledged that the identification of broad areas would only be the start of the development process, and that landscape will be considered in detail at the later planning application stage.</p> <p>As such, whilst enabling renewable energy provision within the Cotswolds AONB through Option AB2 has the potential to lead to additional effects on the special qualities of the AONB, landscape character considerations (including associated with the AONBs) would continue to be central to decision making through a broad areas approach to renewable energy.</p>	1	2
Green Infrastructure	<p>It is not possible to differentiate between the options in relation to this IIA theme given impacts would depend on location and scale of</p>	=	=

²¹ Historic England (2020) Wind Energy [online] available at: <https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/wind-energy/>

²² Natural England (date unknown) Assessing On-Shore Wind Energy Development [online] available at: <http://publications.naturalengland.org.uk/file/97013>

and Natural Capital	renewable energy provision and the incorporation of green infrastructure and environmental net gains alongside such provision.		
Biodiversity	<p>The parts of the District within the Cotswolds AONB are rich in biodiversity, with numerous nationally and locally designated nature conservation sites and a significant number of important habitats which form important components of regional and sub-regional ecological networks.</p> <p>Under both options, the construction of renewable energy provision has the potential to result in habitat disturbance and loss. Wind turbine operation and maintenance may disturb sensitive species, and there is a risk of bird and bat collision with moving blades and any additional overhead wires. Geological impacts can include loss of geological exposures, damage or obscuring of geomorphological features, disruption to geomorphological processes and a range of impacts on soils. As such, effects from each option on features and areas of biodiversity and geodiversity interest largely depend on the detailed location, scale and nature of development and the incorporation of avoidance, mitigation and enhancement measures. The 'broad areas' approach put forward through Option AB2 would be likely to exclude from consideration for renewable energy key internationally, nationally and locally designated biodiversity sites, and also key habitats. In addition, local planning policy provisions provide a level of protection to biodiversity, and the identification of broad areas is only the beginning of the development process; impacts on biodiversity will be considered in more detail later at the planning application stage.</p> <p>As such, whilst Option AB1 has the potential to limit impacts on habitats and species within the Cotswolds AONB, biodiversity considerations would continue to be central to decision making through a broad areas approach to renewable energy in the AONB.</p>	1	2
Land, Soil and Water Resources	It is not possible to differentiate between the options in relation to this IIA theme. It is possible that renewable energy development could result in the loss of high-quality agricultural land (until the site is restored to its previous use at the end of its lifecycle). It is not however possible to differentiate between the options in this respect given loss of high quality agricultural land may take place elsewhere if renewable energy provision takes place outside of the AONB.	=	=

Options Relating to Renewable Energy within the AONB



Option AB1: Continue with the current restrictive approach to the provision of renewable energy within the AONB.

Option AB2: Facilitate the identification of broad areas within the AONB where renewable energy might be appropriate, and looked on favourably through the planning process.

Figure 9.1: Summary of appraisal, options relating to renewable energy provision within the AONB

10. Options relating to economy and employment

10.1 The adopted Local Plan presents six policies relating to economy and employment, as follows:

- Employment Development (Policy EC1)
- Safeguarding Employment Sites (Policy EC2)
- Proposals for all types of Employment-Generating Uses (Policy EC3)
- Special Policy Areas (Policy EC4)
- Rural Diversification (Policy EC5)
- Conversion of Rural Buildings (Policy EC6)

10.2 The review of the adopted Local Plan has concluded these policies remain broadly sound. However, it was viewed that some amendments and additions would be required to ensure they remain technically compliant with legislative changes and the provisions of the 2021 NPPF. In addition, the Local Plan team would like to further consider elements relating to factors such the loss of employment land to housing, the under-delivery of employment land in mixed-use development, the need for flexible workspace, the need to support the expansion of the green economy and the need to continue to support economic diversification in the District.

10.3 On this basis two options have been considered to explore these possibilities further, as follows:

- **Option E1:** Revise the extant policies and supporting text solely to ensure they are technically compliant with legislative changes and the revised NPPF.
- **Option E2:** Revise extant policies from a technical viewpoint (as per Option E1) and amend existing or introduce new policy to:
 - ensure that the employment element of mixed-use schemes is developed alongside the housing element;
 - introduce a presumption in favour of viable employment development that demonstrably is part of the “green” economy;
 - identify areas considered to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses;
 - explore the feasibility of using Article 4 Directions to control the ability of Class E development to change to Class C3 (dwelling houses) in specific parts of the District, including safeguarded employment sites that may feature a significant proportion of Class E uses;
 - support homeworking and running a business from home; and
 - for larger development sites, require that the proposal is accompanied by an Employment and Skills Plan that shows how the development will materially contribute to helping the local economy be more self-sufficient and sustainable.

10.4 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.

10.5 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with ‘1’ the most favourable ranking and ‘2’ the less favourable ranking. **Figure 10.1** subsequently presents a visual summary of the findings.

Table 10.1: Appraisal of options relating to economy and employment

Option E1: Revise the extant policies and supporting text solely to ensure they are technically compliant with legislative changes and the revised NPPF.

Option E2: Revise extant policies from a technical viewpoint (as per Option E1) and amend existing or introduce new policy

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		E1	E2
Healthy and Vital Communities	<p>Option E1 will continue to support the economic vitality of the District through updating the existing Local Plan policies to reflect recent legislative changes and updates to the NPPF. Option E2 goes further through actively seeking to address some of the key challenges and opportunities relating to economic vitality in the District, including 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. Through supporting economic and employment opportunities, the option therefore has the potential to do more to promote social inclusion and improve the quality of life of residents.</p> <p>Option E2 will also support the vitality of new communities through seeking to ensure that the employment element of mixed-use schemes is developed at the same time as the housing element. This will support mixed use and diverse communities, and enhance accessibility to economic opportunities. This will also be supported by the option's focus on flexible workspace and working from home. The option will also help reduce the need to travel to economic opportunities, and support healthier modes of travel including walking and cycling.</p>	2	1
Housing	<p>Currently it is common in the District for employment uses to be lost on mixed use development due to a change of use to residential. In this respect Option E2 may limit the level of housing delivered through this means by doing more to ensure that a change of use is not facilitated. However, in the overall scheme of housing delivery in the District, this is unlikely to have significant effects on the delivery of affordable homes or housing of a range of types and tenures.</p>	=	=
Economy and Employment	<p>Given the Local Plan policies' ongoing effectiveness, Option E1 will continue to support the economic vitality of the District through updating the existing Local Plan policies to better reflect recent legislative changes and updates to the NPPF.</p> <p>Option E2 however has the potential to do more to support economic and employment opportunities through actively seeking to address some of the key challenges and opportunities relating to economic vitality in the District. This includes relating to the loss of employment land to housing, the under-delivery of employment land in mixed-use development, the need for flexible workspace and the need to support the expansion of the green economy and economic diversification. In this respect the option will enable policy provisions to be put in place which more proactively respond to some of the key economic trends which have arisen since the Local Plan was adopted.</p>	2	1
Equalities	<p>Option E1 will continue to support the economic vitality of the District through updating the existing Local Plan policies to reflect recent legislative changes and updates to the NPPF. Option E2 goes further through actively seeking address some of the key challenges and opportunities relating to economic vitality in the District, including loss of employment land to housing, the under-delivery of</p>	2	1

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. Through supporting economic and employment opportunities, the option therefore has the potential to do more to promote social inclusion and improve the quality of life of residents, including those with protected characteristics.

Option E2 will also support the vitality of new communities through seeking to ensure that the employment element of mixed-use schemes is developed at the same time as the housing element. This will support mixed use and diverse communities, and enhance accessibility to economic opportunities. This will also be supported by the option's focus on flexible workspace and working from home. In this respect the option will bring a range of benefits for groups with protected characteristics through supporting the accessibility of economic and employment opportunities.

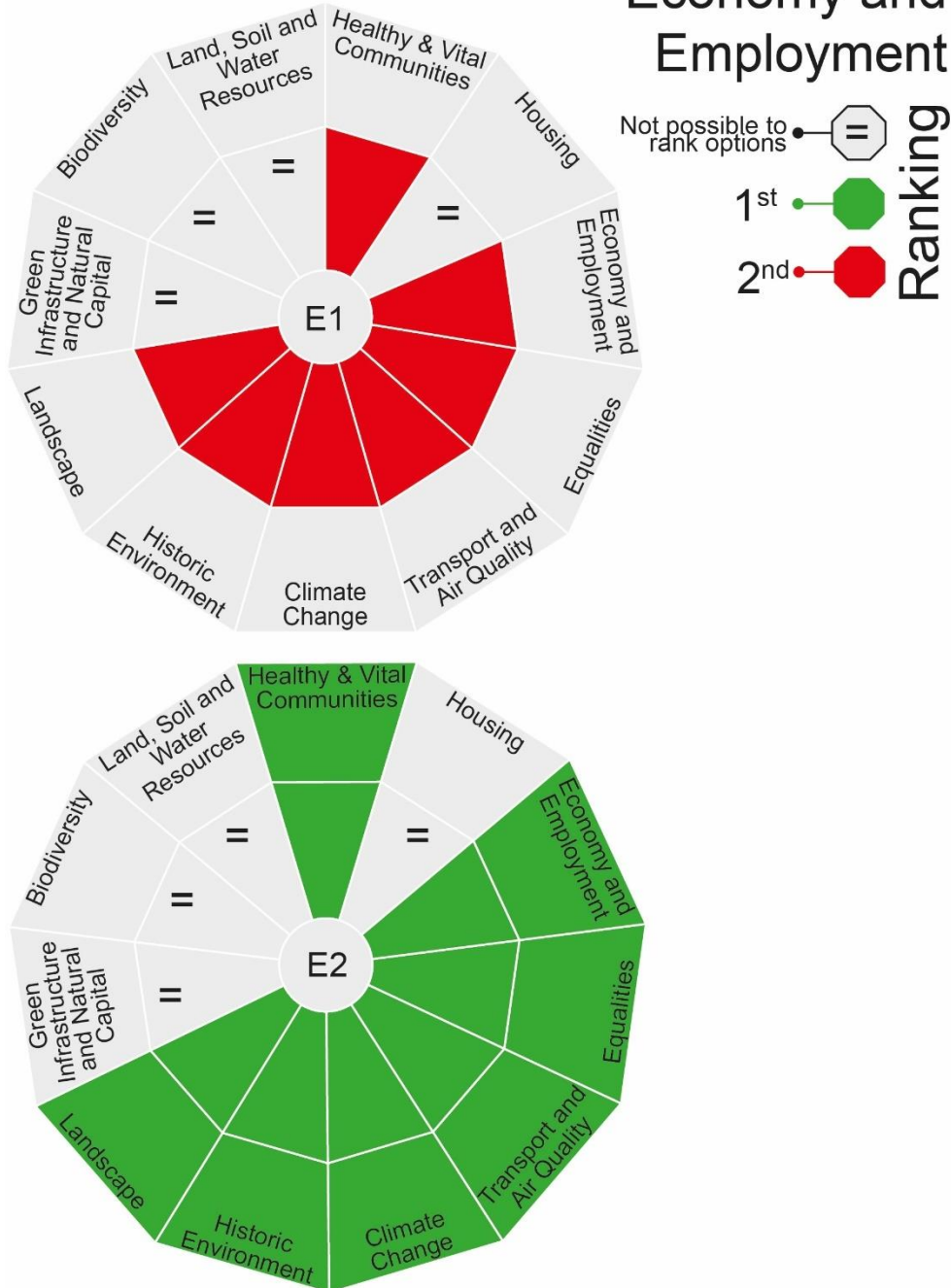
Transport and Air Quality	Through doing more to facilitate communities which remain mixed use, Option E2 has the potential to help reduce the need for residents to travel for economic and employment opportunities. This will be supported by the option's focus on home and flexible working. The option therefore has additional potential to encourage the use of active travel modes and help limit traffic flows, with benefits for air quality.	2	1
Climate Change	Option E2, through doing more to support the continued mixed-use nature of communities, has the potential to help reduce the need for residents to travel to economic and employment opportunities by private car. This will be supported by the option's focus on home and flexible working. The option therefore has the potential to help limit traffic flows and promote sustainable modes of travel; this will help limit greenhouse gas emissions from transport. Option E2 seeks to provide additional support for the diversification of the economy and the green economy. In this respect the option has the potential to support economic activities which support a transition to a low carbon and adaptative economy.	2	1
Historic Environment	The impact of the options in relation to this IIA theme largely depends on the location, design and layout of development in the context of the significance of local assets of historic environment interest, and the extent to which proposals supports the rejuvenation of heritage assets. However, Option E2 may help better manage the location of employment uses which have the potential to have a negative effect on the fabric and setting of the historic environment, or provide additional opportunities for support the rejuvenation of heritage assets.	2	1
Landscape	The impact of the options in relation to the Landscape IIA theme depends on aspects such as location, design and layout of development and the integration of green infrastructure provision. However, the Option E2 may help better manage the location of employment uses which have the potential to have impacts on landscape, townscape or villagescape character.	2	1
Green Infrastructure and Natural Capital	It is not possible to differentiate between the options in relation to this IIA theme given impacts would depend on the incorporation of green infrastructure and environmental net gains alongside development.	=	=
Biodiversity	The impact of the options on habitats, species and ecological networks depends on the location, design and layout of development and the integration of green infrastructure provision. It is therefore not possible to differentiate between the options.	=	=

Land, Soil and Water Resources

It is not possible to differentiate between the options in relation to this IIA theme. This is given the sustainability performance of the options depends on elements such as the extent of the loss of productive agricultural land, the integration of measures which support water quality, and impacts on minerals resources. It is therefore not possible to differentiate between the options.

= =

Options Relating to Economy and Employment



Option E1: Revise the extant policies and supporting text solely to ensure they are technically compliant with legislative changes and the revised NPPF.

Option E2: Revise extant policies from a technical viewpoint (as per Option E1) and amend existing or introduce new policy

Figure 10.1: Summary of appraisal, options relating to economy and employment

11. Options relating to second homes

- 11.1 Within the District, there is a perception that second home ownership, buy to let and holiday lets have removed housing from the market that could otherwise be made available to those who want to own a home. This has limited housing stock availability, with heightened demand for second homes, buy to lets and holiday lets having increased overall demand within a reduced pool of housing, contributing to an inflation of house prices.
- 11.2 House prices beyond the reach of local wages and rents inflated by holiday lets have long been features of the market, but the COVID-19 pandemic has contributed to a shortage of homes for rent, in particular affordable homes.
- 11.3 To consider this issue in more detail, and provide further sustainability context for the purposes of the LPU, the IIA has appraised two options, as follows:
- **Option H1:** Introduce a policy through the LPU which seeks to restrain second home ownership and holiday rentals through introducing restrictions on the use of housing in new developments; and
 - **Option H2:** Do not introduce restrictions on the use of housing in new developments through the LPU.
- 11.4 The following table presents appraisal findings in relation to the two options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.
- 11.5 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the less favourable ranking. **Figure 11.1** subsequently presents a visual summary of the findings.

Table 11.1: Appraisal of options relating to second homes

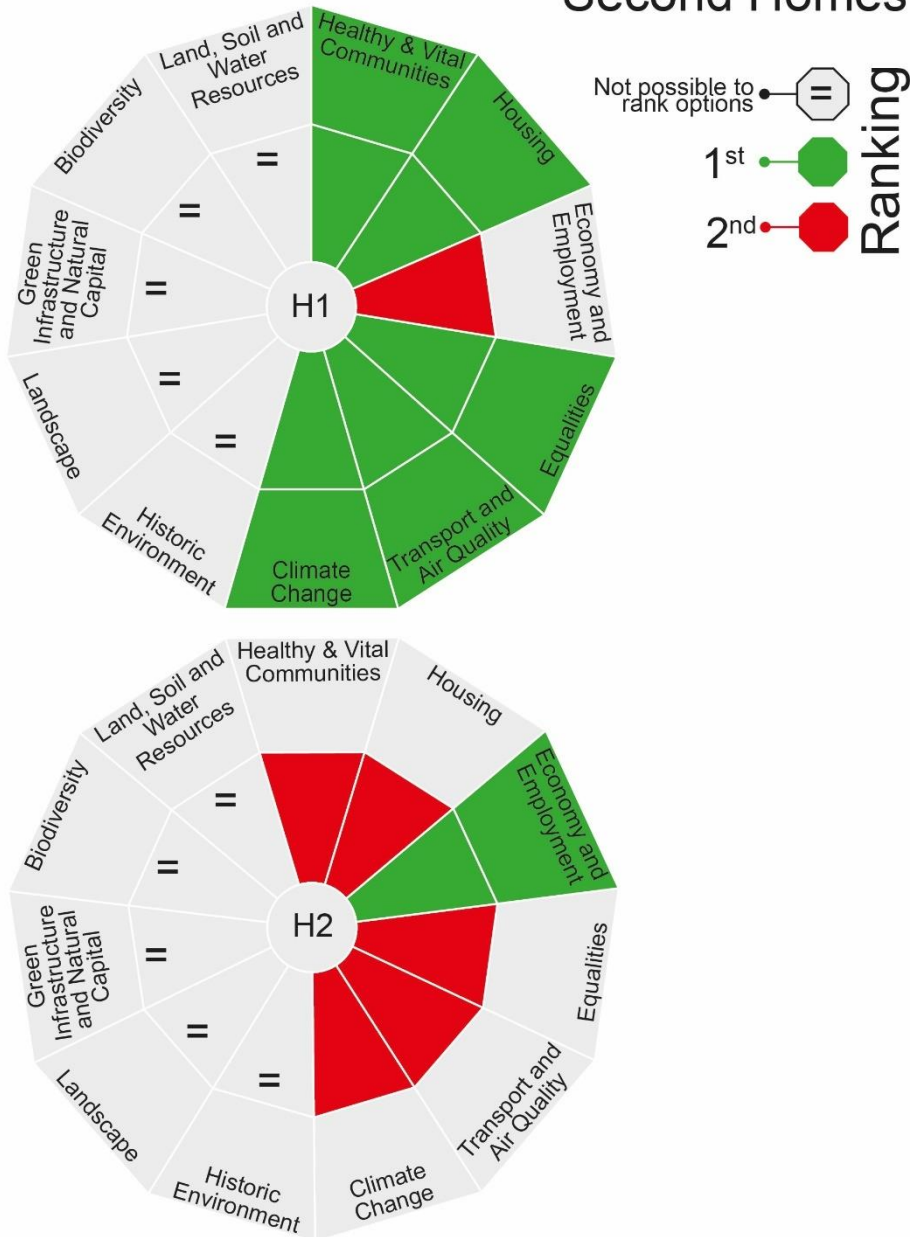
Option H1: Introduce a policy through the LPU which seeks to restrain second home ownership and holiday rentals through introducing restrictions on the use of housing in new developments
Option H2: Do not introduce restrictions on the use of housing in new developments through the LPU.

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		H1	H2
Healthy and Vital Communities	A policy restricting the use of new homes as second homes or holiday lets through Option H1 has the potential to increase opportunities for local people to secure a place on the housing ladder or buy their next home. This is given that such an approach has the potential to increase the availability of housing for those looking to purchase a home for living in. Option H1, through increasing communities' year-round population, has additional potential to support the viability of local services and amenities, including community provision such as shops, recreational, health and education provision. It also has the potential to support the viability of year-round public transport provision. This will support accessibility to services, facilities and amenities for local people, with benefits for social inclusion and community vitality.	1	2
Housing	A policy restricting the use of new homes as second homes or holiday lets through Option H1 has the potential to increase opportunities for local people to secure a place on the housing ladder or buy their next home. This is given that such an approach has the potential to increase the availability of housing for those looking to purchase a home for living in.	1	2

Economy and Employment	<p>Through restricting the availability of self-catering holiday accommodation, Option H1 has the potential to have implications for the vitality of the visitor economy in some locations of the District. This includes through i) the potential for affecting the viability of economic activities dependent on tourism ii) and increasing rental costs for holidaymakers. However, this may be balanced against increased vitality of retail outlets and other services as a result of a bigger year-round population utilising local services.</p> <p>It should be noted that no explicit evidence on the potential effects on the visitor economy is available to inform the appraisal.</p>	2	1
Equalities	<p>A policy restricting the use of new homes as second homes or holiday lets through Option H1 has the potential to increase opportunities for groups with protected characteristics to secure a place on the housing ladder or buy their next home. This is given such an approach has the potential to increase the availability of housing for those looking to purchase homes for living in.</p> <p>Option H1, through increasing the year-round population, has increased potential to support the viability of local services and amenities, including community provision such as shops and recreation and health and education provision. It also has the potential to support the viability of year-round public transport provision. This will support accessibility to services, facilities and amenities for local people from groups with protected characteristics, with benefits for social inclusion and community vitality.</p>	1	2
Transport and Air Quality	<p>Congestion levels in some locations in the District are significantly affected by visitor traffic. In this context Option H2 is likely to contribute to congestion issues during peak times of the year, including the summer period. Due to the relatively small proportion of the total housing stock that will be affected by the options, effects are likely to be limited.</p> <p>Whilst Option H1 has the potential to increase year-round traffic flows, it also has the potential to support the viability of year-round public transport networks and local amenities. This will support accessibility by sustainable modes of transport for those living in communities particularly affected by second home and holiday home ownership.</p>	1	2
Climate Change	<p>In terms of adaptation to the effects of climate change, an increase in the District's year-round (rather than seasonal) population through Option H1 has the potential to increase resilience to extreme weather events in some locations. This includes through increasing the year-round availability of 'human capital', which will help improve the maintenance of existing properties (and neighbourhoods) and enabling a more effective response to extreme weather events when they occur.</p> <p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the District. Whilst greenhouse gas emissions are likely to increase during peak holiday periods under Option H2, Option H1 has the potential to increase the carbon footprint of the District during the rest of the year. Overall, it is uncertain at this level of detail which of the options is likely to do most to limit greenhouse gas emissions over an annual period, although the difference is unlikely to be significant.</p>	1	2
Historic Environment	<p>A policy which seeks to restrain second home ownership in the District is unlikely to have any large-scale implications for the significance of historic environment assets. In this respect a policy which seeks to restrain second home ownership in the District is unlikely to have any significant implications with appropriate policies in place to encourage design and layout which reinforces the significance of the historic environment.</p>	=	=

Landscape	A policy which seeks to restrain second home ownership in the District is unlikely to have any significant implications for landscape, villagescape or townscape character. In this respect a policy which seeks to restrain second home ownership is unlikely to have any significant implications for the design of new development with appropriate policies in place.	=	=
Green Infrastructure and Natural Capital	It is not possible to differentiate between the options in relation to this IIA theme; a policy which seeks to restrain second home ownership is unlikely to have any significant implications for green infrastructure delivery.	=	=
Biodiversity	The impact of the options on habitats, species and ecological networks depends on the location, design and layout of development and the integration of green infrastructure provision. It is unlikely that the use of housing will significantly affect the extent to which the protection and enhancement of biodiversity assets is achieved.	=	=
Land, Soil and Water Resources	It is not possible to differentiate between the options in relation to this IIA theme. This is given the sustainability performance of new development depends on elements such as the extent of the loss of productive agricultural land, the integration of measures which support water quality, and impacts on minerals resources. The use of housing is unlikely to significantly affect these elements.	=	=

Options Relating to Second Homes



Option H1: Introduce a policy through the LPU which seeks to restrain second home ownership and holiday rentals through introducing restrictions on the use of housing in new developments; and

Option H2: Do not introduce restrictions on the use of housing in new developments through the LPU.

Figure 11.1: Summary of appraisal, options relating to second homes

12. Options relating to tourism

12.1 Tourism continues to be a vital part of the District’s economy. However, with increased visitor numbers, the sector can create adverse effects in parts of the District, including with regards to traffic flows, air and noise quality impacts, townscape and landscape impacts and increased emissions of greenhouse gas emissions from transport. As such, there is a strong recognition of the need to limit impacts from the tourism sector and enhance its sustainability.

12.2 In this respect three options have been considered through the IIA, as follows:

- **Option T1:** Continue with the current Local Plan policy approach to tourism provision in the District.
- **Option T2:** Restrict certain types of tourism activity, with a view to managing the adverse effects of tourism in the District.
- **Option T3:** Commit to the implementation of a Green Tourism Strategy.

12.3 The following table presents appraisal findings in relation to the three options introduced above. These are organised by the eleven IIA themes and use the IIA Framework set out above.

12.4 For each IIA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with ‘1’ the most favourable ranking and ‘3’ the least favourable ranking. **Figure 12.1** subsequently presents a visual summary of the findings.

Table 12.1: Appraisal of options regarding tourism

Option T1: Continue with the current Local Plan policy approach to tourism provision in the District.

Option T2: Restrict certain types of tourism activity, with a view to managing the adverse effects of tourism in the District.

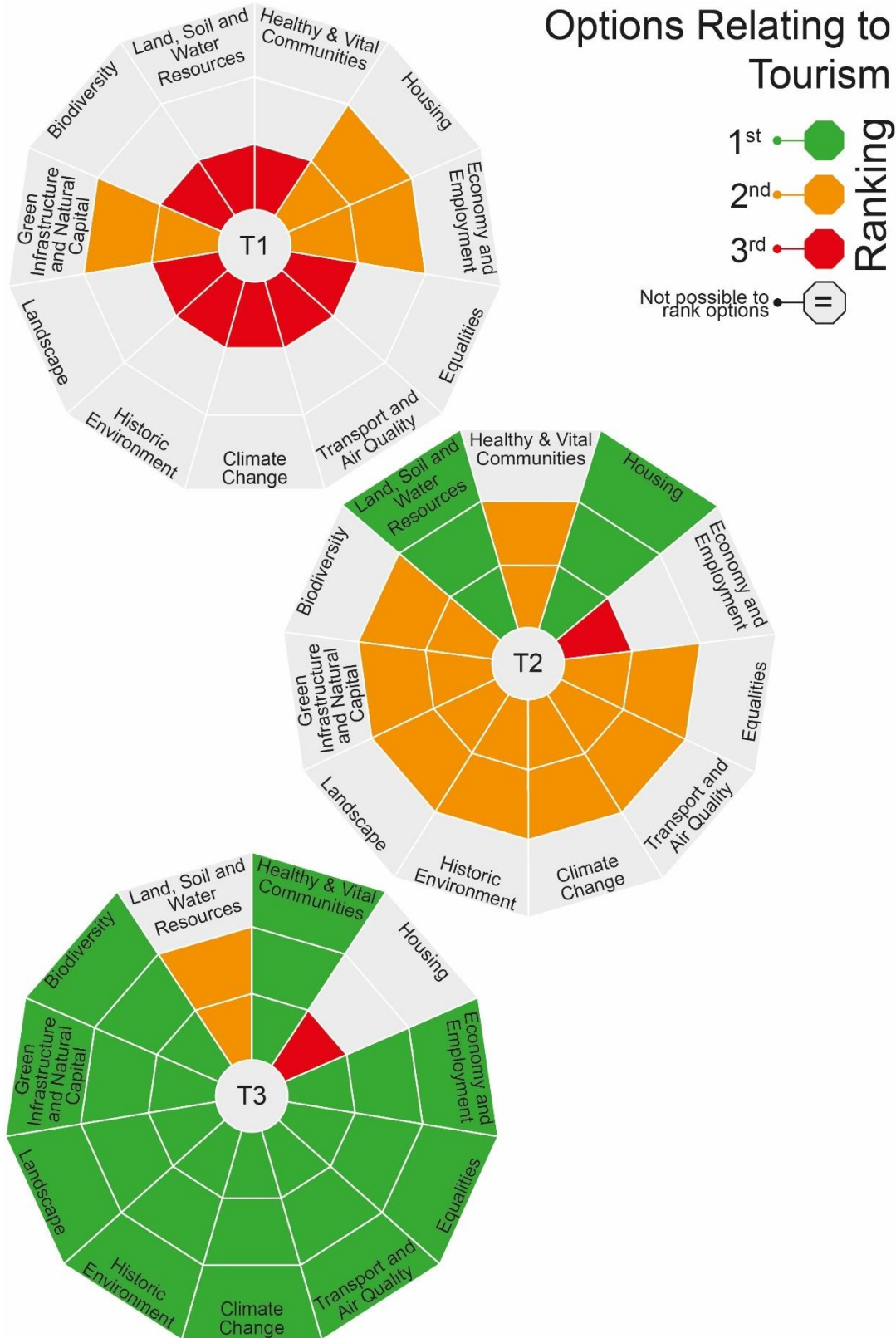
Option T3: Commit to the implementation of a Green Tourism Strategy.

IIA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		T1	T2	T3
Healthy and Vital Communities	A restriction of tourism activity through Option T2 has the potential to reduce the impact of the visitor economy on some communities from issues such as traffic and congestion, impacts on the quality of the public realm, and noise and air quality issues. However, the option has the potential to limit 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. In this respect the implementation of a Green Tourism Strategy through Option T3 offers the opportunity to better balance the benefits of the visitor economy for the District with the effective management of its sometimes adverse effects.	3	2	1
Housing	The implementation of a Green Tourism Strategy through Option T3, through encouraging year-round tourism and a greater spread of tourism offer across the District, has the potential to have implications for the availability of housing. This includes through increased use of the housing stock for holiday lets throughout the year through focusing on the tourism sector. Option T2, through restricting tourism provision, may increase the availability of housing.	2	1	3

Economy and Employment	Option T2, through a restriction of tourism activity, has the potential to limit the economic benefits of the visitor economy in the District. This has the potential to impact on employment opportunities and have a disproportionate effect on the settlements with a strong economic base in tourism. Through taking a different approach to managing visitors, Option T3 has the potential to do more to limit the adverse impacts of tourism and increase the resilience of the sector, whilst helping to preserve and enhance the factors which make the District an appealing destination for visitors.	2	3	1
Equalities	A restriction of tourism activity through Option T2 has the potential to reduce the impact of the visitor economy on those from groups with protected characteristics from issues such as traffic and congestion, impacts on the quality of the public realm, and noise and air quality issues. These are issues which disproportionately affect many groups with protected characteristics. However, the option has the potential to limit 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. In this respect the implementation of a Green Tourism Strategy through Option T3 offers the opportunity to better balance the benefits of the visitor economy with the effective management of the potential adverse effects of tourism in the District.	3	2	1
Transport and Air Quality	Option T2 has the potential to reduce the impacts of traffic and congestion associated with elevated visitor numbers through a restriction in tourism activity. However, a Green Tourism Strategy implemented through Option T3 has the potential to proactively manage the identified issues associated with the visitor economy with regards to traffic and transport, and help deliver longer term sustainable solutions to these issues.	3	2	1
Climate Change	Whilst Option T2 has the potential to reduce emissions from the visitor economy through a restriction of tourism activities, Option T3 is likely to do more to encourage longer term sustainable solutions to increasing visitor numbers. This will help limit per capita emissions from an expanding tourism economy. In terms of adaptation to the effects of climate change, it is not possible to differentiate between the options.	3	2	1
Historic Environment	Both Options T2 and T3 have the potential to limit adverse impacts on the historic environment from tourism. However, Option T3, through the implementation of Green Tourism Strategy, offers the opportunity to offer sustainable solutions to the adverse effects of tourism in the District's rich historic environment. A proactive approach offered by the option also offers additional opportunities for the rejuvenation of heritage assets and for facilitating the increased enjoyment and understanding of the District's historic environment.	3	2	1
Landscape	Both Options T2 and T3 have the potential to limit adverse impacts on landscape, villagescape and townscape character from tourism. However, Option T3, through the implementation of Green Tourism Strategy, offers the opportunity to offer sustainable solutions to the adverse effects of tourism in the District's character. A proactive approach offered by the option also offers additional opportunities for facilitating the increased enjoyment and understanding of the District's character and distinctiveness.	3	2	1

Green Infrastructure and Natural Capital	Through the implementation of a Green Tourism Strategy, Option T3 has additional potential to help deliver opportunities for enhancements to green infrastructure provision and ecosystem services through the design of tourism provision.	2	2	1
Biodiversity	Both Options T2 and T3 have the potential to limit adverse impacts on biodiversity from tourism. A Green Tourism Strategy approach may however offer additional potential to deliver benefits for habitats and species through helping to manage the impacts of tourism on biodiversity and offering additional opportunities for an enhanced understanding and awareness of the District's rich biodiversity resource.	3	2	1
Land, Soil and Water Resources	The sustainability performance of the options depends on elements such as the extent of the loss of productive agricultural land, the integration of measures which support water quality, and impacts on minerals resources. A restriction of tourism through Option T2 may however limit the loss of agricultural land for purposes of tourism infrastructure and limit pressures on water resources. The delivery of a Green Tourism Strategy through Option T3 also offers increased potential for impacts on land, soil and water resources from tourism to be more effectively managed.	3	1	2

Options Relating to Tourism



Option T1: Continue with the current Local Plan policy approach to tourism provision in the District.

Option T2: Restrict certain types of tourism activity, with a view to managing the adverse effects of tourism in the District.

Option T3: Commit to the implementation of a Green Tourism Strategy.

Figure 12.1: Summary of appraisal, options relating to tourism

13. Next steps

- 13.1 This Interim IIA Report accompanies the current consultation on the Issues and Options document for the LPU.²³
- 13.2 Following the receipt of consultation responses, the draft LPU will be prepared by CDC and released for Regulation 19 consultation. Development of the draft LPU will be informed by the findings of this Interim IIA Report, representations made through the current consultation and the outcomes of further evidence base studies prepared to inform the LPU. It will also be informed by the undertaking of further IIA work, including potentially relating to options relating to housing delivery and spatial strategy options.
- 13.3 To support Regulation 19 consultation on the draft LPU, an IIA Report will be prepared. The IIA Report, which will be presented for consultation alongside the draft LPU, will present the information required by the SEA Regulations.
- 13.4 In line with the SEA Regulations, the IIA Report will answer the three questions:
- What has plan-making / IIA involved up to this point?
 - Including with regards to the consideration of ‘reasonable alternatives’
 - What are the appraisal findings at this current stage?
 - i.e. in relation to the updated policies currently proposed for the LPU, as presented in the draft LPU document
 - What are the next steps for plan making?
- 13.5 These questions are derived from Schedule 2 of the SEA Regulations, which set out ‘the information to be provided within the [environmental] report’.
- 13.6 It is currently anticipated that Regulation 19 consultation on the draft LPU and accompanying IIA Report will take place at the end of 2022.
- 13.7 Once the period for representations on the Regulation 19 version of the LPU document / IIA Report has finished, the main issues raised will be identified and summarised by CDC, which will then consider whether, in light of representations received, the plan can still be deemed ‘sound’. If this is the case, the LPU will be submitted to the Secretary of State for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the IIA Report alongside it.
- 13.8 At Examination, the Inspector will consider representations (alongside the IIA Report) before then reporting back. If the Inspector identifies the need for modifications to the LPU, these will be prepared (and undergo IIA) and will then be subject to consultation (with an IIA Report Addendum published alongside).
- 13.9 Once found to be ‘sound’, the LPU will be formally adopted by CDC. At the time of adoption, a IIA ‘Statement’ must be published that sets out (amongst other elements) “the measures decided concerning monitoring the Plan”.

²³ Cotswold District Council (January 2022) *Cotswold District Local Plan 2011 – 2031 (2021 Update): Regulation 18 Issues and Options Consultation*

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