

Cotswold District Local Plan

Sustainability Appraisal Adoption Statement

July 2018

Quality information

Prepared by

Nick Chisholm-Batten
Associate

Checked by

Steve Smith
Technical Director

Approved by

Steve Smith
Technical Director

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Prepared for:

Cotswold District Council

Prepared by:

AECOM Infrastructure & Environment UK Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

T: +44 117 901 7000
aecom.com

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1. Introduction

Background

- 1.1 Cotswold District Council has recently prepared a new Local Plan to replace the Cotswold District Local Plan 2001-2011. The new Local Plan, which covers the period to 2031, will be the key planning policy document for the district and will guide decisions on the use and development of land.
- 1.2 The Cotswold District Local Plan was submitted to the Government for examination by an appointed Planning Inspector on 7th July 2017. Examination hearings were held in October and November 2017, subsequent to which Cotswold District Council held a consultation on Main Modifications (to the submitted plan) for a six week period ending on 4th April 2018.
- 1.3 The Inspector published a report into the Plan's legal compliance and soundness on 7th June 2018. The Inspector concluded that the Plan is legally compliant and sound, subject to a series of modifications being made. The Local Plan, incorporating these modifications, is recommended for adoption at a Full Council meeting on 3rd August 2018.
- 1.4 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM (from 2015 onwards; with earlier SA having been led by the Council). SA is a mechanism for assessing and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to achieving sustainable development.

SA explained

- 1.5 SA assesses the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution towards sustainable development.
- 1.6 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law European Union Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. SA widens the scope of the assessment to also include social and economic issues.

This SA Adoption Statement

- 1.7 Regulation 16 of the SEA Regulations sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency.
- 1.8 In addition Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the final SA Report alongside the Adopted Local Plan.
- 1.9 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the Cotswold District Local Plan must explain:

- How environmental (and sustainability) considerations have been integrated into the Local Plan.
- How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and Environmental/SA Report have been taken into account.
- The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.10 In association with the above requirements, the SA Adoption Statement is structured as follows:

- **Chapter 2** of this SA Adoption Statement presents the narrative for plan making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above
- **Chapter 3** describes how consultation responses have been taken into account through the Local Plan/SA process
- **Chapter 4** presents the monitoring programme for the SA.

2. How the SA process has informed and influenced the development of the Local Plan

Overview of Local Plan development/SA since 2007

- 2.1 The SA process has informed and influenced the Local Plan throughout its development. Reflecting this, eight main SA documents have been prepared to accompany key points in plan development.
- 2.2 **Figures 2.1** and **2.2** below summarise the key documents which have been prepared for the Local Plan and accompanying SA process to date.

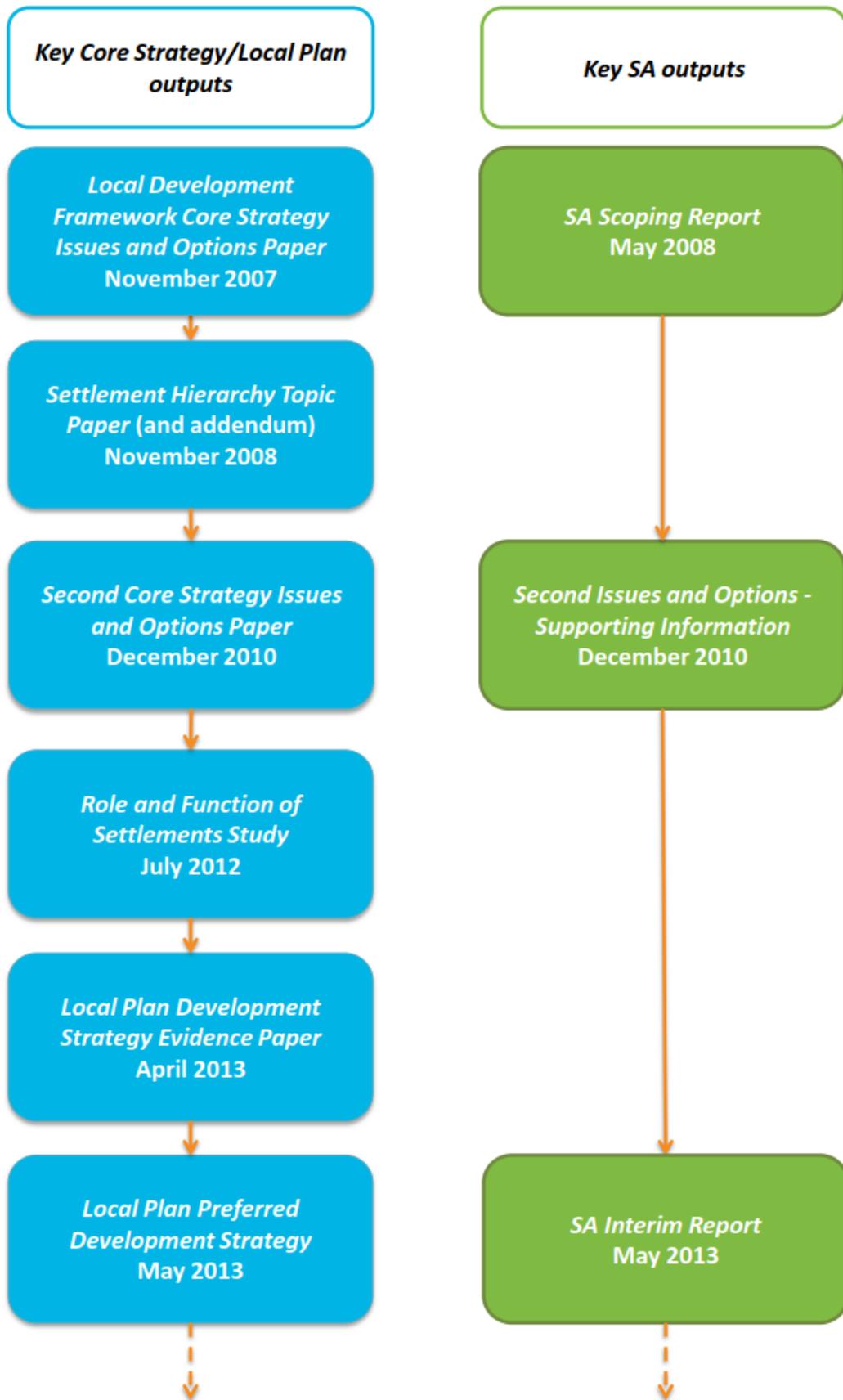


Figure 2.1: Key outputs of the Cotswold District Local Plan and accompanying SA process (to May 2013)

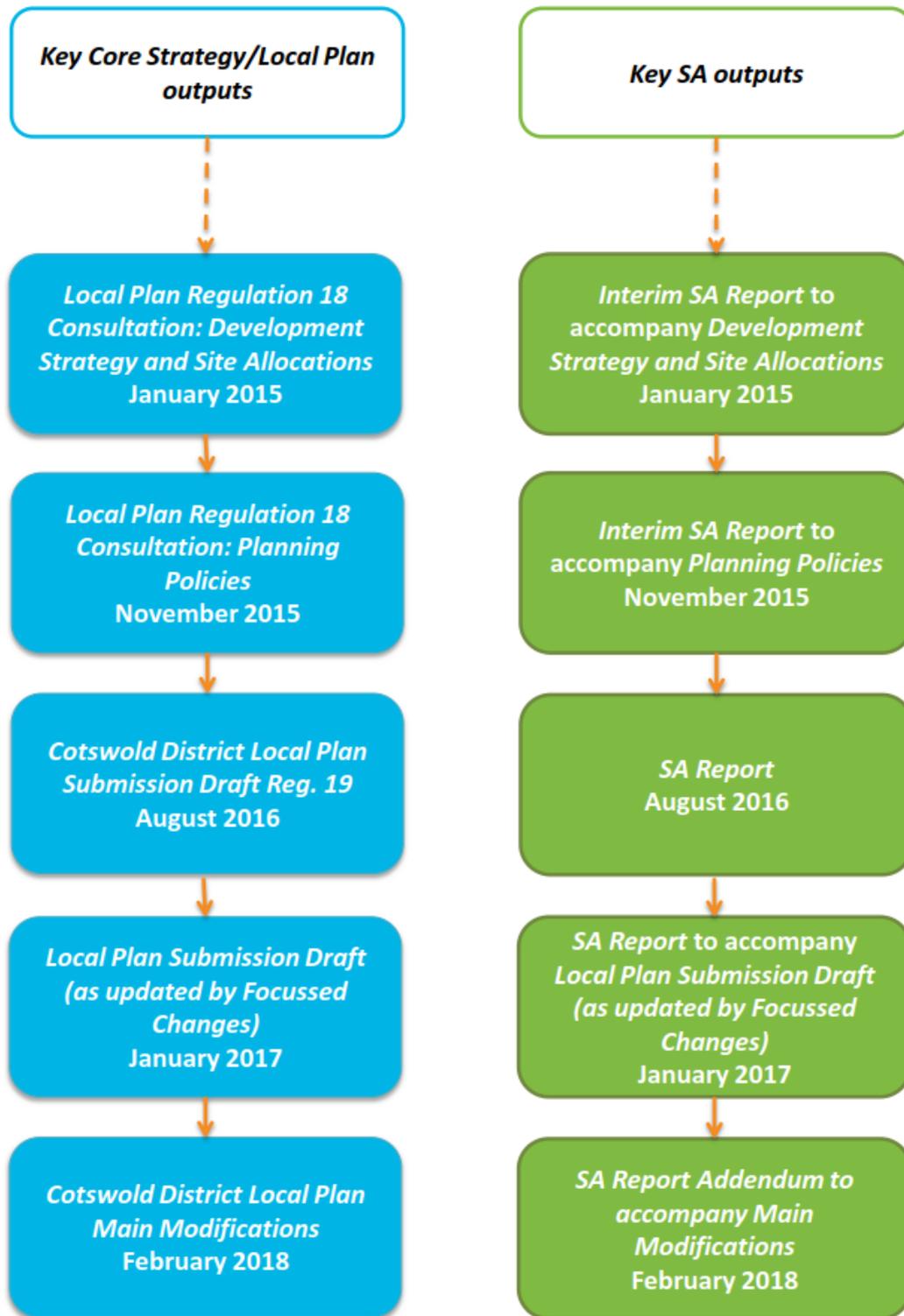


Figure 2.2: Key outputs of the Cotswold District Local Plan and accompanying SA process (May 2013 to February 2018)

Appraisal of reasonable alternatives for the Local Plan's spatial strategy

- 2.3 A key element of how the SA process has informed and influenced the development of the Local Plan is how the SA has informed the consideration of reasonable alternatives, including the preferred spatial strategy for the plan.
- 2.4 The following sections therefore describe how the SA process to date has informed the preferred development strategy for Cotswold District and potential locations for proposed development. Specifically, these sections explain how the Local Plan's development strategy has been developed in terms of housing numbers and distribution, including relating to:
- Consideration of options for the preferred development strategy for the Local Plan, including which settlements in the district are appropriate for Local Plan allocations;
 - Consideration of strategic options for potential development areas in each settlement;
 - Detailed consideration (SA) of site options for strategic scale development in the district, including combinations of potential locations;
 - Detailed consideration (SA) of site options for non-strategic scale development in the district; and
 - Detailed consideration (SA) of site options for gypsy and traveller accommodation.

Development of the preferred development strategy for the Local Plan, including choice of settlements

- 2.5 Earlier work on the (then) Core Strategy had established a series of nine provisional 'Spatial Strategy Options' for the development strategy for the district. These were as follows:
- SS1: Focus development in and around Cirencester;
 - SS2: Locate development in Cirencester, Market Towns, Small Towns and Larger Local Service Centres;
 - SS3: Spread development to any settlement;
 - SS4: Spread development across Cirencester, Market Towns, Small Towns and those Local Service Centres with a reasonable level of facilities;
 - SS5: Use public transport routes and transport corridors as the main guiding factor when locating development;
 - SS6: New settlements or expanded settlements, e.g. large brownfield sites;
 - SS7: Areas outside of the AONB to be prioritised;
 - SS8: Focus on settlements that welcome further development; or
 - SS9: Development across Cirencester, Market Towns, Small Towns and those Local Service Centres with a reasonable level of facilities including Employment.
- 2.6 These Spatial Strategy Options were considered by the Local Development Framework Steering Group in relation to which towns and villages in the district were most suited to development in terms of their existing facilities and services. The options were also appraised through the SA process.
- 2.7 Following this evaluation, the following Spatial Strategy Options were taken forward in the Second Issues and Options Paper, December 2010:

- SS2: Locate development in Cirencester, Market Towns, Small Towns and Larger Local Service Centres
 - SS3: Spread development to any settlement
 - SS9: Development across Cirencester, Market Towns, Small Towns and those Local Service Centres with a reasonable level of facilities including employment.
- 2.8 The full rationale for taking forward these Spatial Strategy Options over the others was presented in the *Second Issues and Options- Supporting Information* document (December 2010).
- 2.9 Once the broad spatial strategy for the district had been framed following consultation on the Second Issues and Options Paper, 31 settlements in the district were assessed for potential inclusion in the Preferred Development Strategy. These settlements were then considered through the Role and Function of Settlements Study (July 2012).
- 2.10 In order to explore how different settlements ranked in terms of their overall social and economic sustainability, scores were applied to the conclusions from the Role and Function of Settlements Study in respect of the following categories:
- Employment
 - Retailing
 - Community facilities
 - Sustainable travel
- 2.11 In addition, evidence related to flood risk, landscape, conservation areas, archaeological sites, public rights of way, wildlife sites and other environmental considerations was considered.
- 2.12 Likely capacities of the candidate settlements were also assessed, taking account of the Strategic Housing and Economic Land Availability Assessment (SHELAA). On this basis, it was decided that the development strategy would not take forward settlements where the SHELAA had demonstrated limited capacities (i.e. less than 40 housing units).
- 2.13 Following this process, 17 of the 31 settlements were taken forward for the Preferred Development Strategy. The full justification for including these 17 settlements in the Preferred Development Strategy is presented in the *Development Strategy Evidence Paper*.
- 2.14 Subsequent to the publication of the latest review of the SHELAA, Down Ampney was added to the settlements to take forward for the development strategy, giving a total of 18 settlements. The decision to include Down Ampney was taken by the Council in December 2013.
- 2.15 On the basis of the above process, the 18 settlements taken forward for the development strategy for the Local Plan were as follows:
- Andoversford
 - Bourton-on-the-Water
 - Cirencester
 - Fairford
 - Lechlade
 - Moreton-in-Marsh
 - Siddington
 - Blockley
 - Chipping Campden
 - Down Ampney
 - Kemble
 - Mickleton
 - Northleach
 - South Cerney

- Stow-on-the-Wold
- Tetbury
- Upper Rissington
- Willersey

Consideration of reasonable alternatives for potential development areas in the vicinity of the chosen settlements

- 2.16 To support the process of considering where site allocations in each of the 18 settlements might be appropriate, the SA team considered the existing environmental constraints within a series of broad areas surrounding each settlement. Loosely reflecting the various 'points of the compass', these broad areas were considered by the SA process to inform the analysis of potential locations for development within and in the vicinity of the 18 settlements.
- 2.17 The analysis evaluated the key environmental constraints present in each of the broad areas identified. These included biodiversity, flood risk, the historic environment, landscape quality, water and agricultural land quality.
- 2.18 Subsequent work on site allocations revealed that there were no realistic opportunities to deliver significant development at Siddington village over the remainder of the Plan period. Moreover, only a few dwellings had been built or committed since 2011. This led to the conclusion that Siddington should be deleted from the Development Strategy, thus reducing the number of named settlements from 18 to 17.

Appraisal of reasonable alternatives for strategic scale development

Strategic location in the context of Cotswold District

- 2.19 At the time of producing the Core Strategy, PPS12 (Local Spatial Planning) allowed for the identification of areas of strategic significance.¹ The Regional Spatial Strategy also presented a presumption that a concentration of growth on the periphery of 'Strategically Significant Cities and Towns' was the most sustainable solution to growth.
- 2.20 When considering locations for a 'strategic' scale of development, it was considered that Cirencester was the only location in the district with the capacity for such development. In this context, the principle of choosing Cirencester as the sole location in the district where strategic scale development would be appropriate was based on the following considerations, as set out in the Second Issues and Options Paper and Supporting Information (2010):
- Cirencester is the district's largest town by a significant margin and is home to almost a quarter of the district's population.
 - The town has an extensive range of services, facilities and employment opportunities, and dominates much of the southern half of the district. A third of all jobs in Cotswold District are located in Cirencester. Its service centre role extends beyond the district and county boundaries into neighbouring areas.
 - Meeting housing requirements in the district would lead to an over-development of the main service centres if a significant proportion of the housing allocation were not directed to Cirencester. Sharing this amount of housing more equally between Cirencester and the other smaller settlements would result in disproportionate growth in these smaller settlements.
 - Larger scale development is needed in the town to support the community and infrastructure projects included in the Cirencester Community Plan. These projects are of sufficient significance and scale to benefit large parts of the district.

¹ Paragraph 4.6 – "Core Strategies may allocate strategic sites for development. These should be those sites considered central to the achievement of the strategy. Progress on the Core Strategy should not be held up by the inclusion of non-strategic sites."

- Strategic scale development would support the regeneration of Cirencester town centre. Larger scale development would enable a proportion of developer contributions to be used as match funding, and additional housing would further enable services, facilities and cultural opportunities to survive due to increased use of town centre services.

Appraisal of potential locations in Cirencester for strategic scale sites

2.21 An appraisal of strategic scale site options was carried out through the SA process, and the findings presented and consulted on in the Sustainability Appraisal Interim Report, Local Plan (May 2013). The principal potential options were:

1. Land at Chesterton
2. Hare Bushes
3. Land east of Kingshill Lane
4. Land at Worm's Farm

2.22 Findings of the appraisal in relation to each site were presented in the SA Report submitted alongside the Local Plan.

Appraisal of 'combinations' of potential strategic locations in Cirencester (2014)

- 2.23 Following the receipt of consultation responses on *the Local Plan Preferred Development Strategy*, a further appraisal of potential 'combinations' of these site options was undertaken. Extending the appraisal previously carried out of the four alternative options for strategic sites in Cirencester, the appraisal comprised an assessment of different combinations of these sites.
- 2.24 The purpose of this appraisal was to provide additional sustainability context in relation to the four site options for delivering strategic scale allocations through considering the potential cumulative effects of taking forward potential combinations of the sites.
- 2.25 Eleven combinations of sites were considered through the appraisal. These combinations are presented in **Table 2.1** below.

Table 2.1: Combinations of potential locations for strategic scale allocations in Cirencester

Combination	Locations
Combination 1	Land at Chesterton (1) and Hare Bushes (2)
Combination 2	Land at Chesterton (1) and Land east of Kingshill Lane (3)
Combination 3	Land at Chesterton (1) and Land at Worm's Farm (4)
Combination 4	Land at Worm's Farm (4) and Hare Bushes (2)
Combination 5	Land at Worm's Farm (4) and Land east of Kingshill Lane (3)
Combination 6	Land east of Kingshill Lane (3) and Hare Bushes (2)
Combination 7	Land at Chesterton (1), Land at Worm's Farm (4), Land east of Kingshill Lane (3) and Hare Bushes (2)
Combination 8	Land at Chesterton (1), Land at Worm's Farm (4) and Land east of Kingshill Lane (3)
Combination 9	Land at Chesterton (1), Land at Worm's Farm (4) and Hare Bushes (2)
Combination 10	Land at Chesterton (1), Land east of Kingshill Lane (3) and Hare Bushes (2)
Combination 11	Land at Worm's Farm (4), Land east of Kingshill Lane (3) and Hare Bushes (2)

- 2.26 These combinations were appraised against the SA Framework of objectives and decision-making questions developed during scoping and subsequently refined.
- 2.27 Following the appraisal of alternative options for sites which could accommodate a strategic scale of development in Cirencester, it was concluded by Cotswold District Council that the Land South of Chesterton option would be the most appropriate for taking forward for the purposes of the Local Plan.

Appraisal of reasonable alternatives for sites of a non-strategic scale

- 2.28 In early 2014, facilitated engagement was undertaken with communities from the 18 settlements then identified for the Preferred Development Strategy. Working groups from each of those settlements examined potential non-strategic SHELAA sites (including reasonable alternatives where they existed) and submitted views on these, taking account of local issues, infrastructure requirements and other factors. Several additional sites were also put forward by communities where there were realistic chances of development.
- 2.29 Following this process, 123 potential sites of a non-strategic scale were considered in terms of their suitability for taking forward through the Local Plan. To support this process, an appraisal of each of these sites was undertaken through the SA process with the aim of informing the proposed allocations of sites of a non-strategic scale. To support plan making at this stage of development of the Local Plan, a number of possible mitigation measures were also recommended through the SA process. These were designed to limit potential significant effects that had the potential to arise as a result of the allocation of sites in the district.
- 2.30 Following the consideration of the 123 sites (informed by the SA process), it was decided to take forward 39 proposed housing and employment sites through Regulation 18 consultation on the *Development Strategy and Site Allocations* document (January 2015).
- 2.31 In this context, consultation undertaken on the *Development Strategy and Site Allocations* document presented 28 preferred sites for housing allocations, six preferred sites for employment allocations, three sites for mixed use development, one site for a hotel and one site for a car park.
- 2.32 Subsequent to the completion of consultation on the *Development Strategy and Site Allocations* document and subsequent *Planning Policies* document undertaken later in 2015, these sites were further refined to:
- 30 Preferred Sites for housing allocations;
 - 6 Preferred Sites for employment allocations; and
 - 5 Preferred Sites for mixed use (in addition to the strategic scale site at Cirencester)

Appraisal of reasonable alternatives for gypsy, traveller and travelling show people sites

- 2.33 As part of the development of the Local Plan, Cotswold District Council identified a range of potential sites for allocating gypsy, traveller and travelling show people pitches.
- 2.34 The potential sites for allocating pitches were considered in terms of their suitability for taking forward through the Local Plan. To support this process, an appraisal was undertaken for each of these sites through the SA process, with the aim of informing the proposed allocation of pitches. The appraisal of these sites was then revisited as part of the Main Modifications for the Local Plan (January 2018). This was in response to examination hearings and the latest available evidence, notably the Gypsy & Traveller Accommodation Assessment.

Development of planning policies for the Local Plan

Local Plan planning policies

- 2.35 At various stages of plan making, the SA process has appraised and informed emerging plan policies.
- 2.36 As highlighted above, the *Local Plan Regulation 18 Consultation: Planning Policies* document was released for consultation in November 2015. The *Planning Policies* document set out a series of proposed criteria by which planning applications and site allocations would be considered and determined in the district. These were developed to reflect the various evidence studies prepared to support the development of the Local Plan to date and also to reflect the findings of the appraisal of the preferred development strategy and reasonable alternatives through the SA process.
- 2.37 The *Planning Policies* consultation was accompanied by an Interim SA Report. This was designed to inform the consultation through presenting an appraisal of the proposed planning policies presented in the *Planning Policies* document.
- 2.38 In addition to presenting an appraisal of the draft planning policies for the Local Plan, the Interim SA Report presented a series of recommendations for consideration during the preparation of the Regulation 19 Submission Draft of the Local Plan.
- 2.39 The planning policies for the Local Plan were then updated for Regulation 19 consultation, and again appraised through the SA process and recommendations made. The findings of the appraisal and recommendations were presented in the SA Report accompanying Regulation 19 consultation (August 2016).
- 2.40 Following Regulation 19 consultation, a number of changes were made to the plan as 'Focussed Changes'. The updated plan policies were appraised and presented in the SA Report accompanying consultation on the Local Plan Submission Draft (as updated by Focussed Changes).
- 2.41 The SA Report Addendum (January 2018) then presented an appraisal of the Main Modifications undertaken to the Local Plan following examination.

3. Consultation responses and how they have been taken into account

- 3.1 Regulation 16 of the SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account.
- 3.2 As discussed in **Chapter 2** (and as visualised in **Figures 2.1** and **2.2**), at each stage of the Local Plan's development, an SA Report was published alongside the Local Plan for consultation.
- 3.3 Consultation included with:
- the three statutory bodies for SEA (the Environment Agency, Historic England and Natural England);
 - other stakeholders; and
 - the general public.

Responses received at Regulation 18 and 19 consultation and at the Focussed Changes stage

- 3.4 The responses received prior, and subsequent, to publication of the Local Plan were presented in the Local Plan Statement of Consultation². This included a description of the key consultation processes undertaken for the Local Plan; a summary of the main issues raised by responses; and how they had been addressed.
- 3.5 The Statement of Consultation can be accessed at the following location:
- <https://www.cotswold.gov.uk/media/1519929/SD009-Consultation-Statement-2017.pdf>

Responses received at the Main Modifications stage

- 3.6 Cotswold District Council has also prepared a summary of the representations made during the six week consultation on the Main Modifications undertaken in January 2018. At the Inspector's request, Cotswold District Council did not provide responses to these representations.
- 3.7 A summary of the representations made at Main Modifications stage can be accessed at the following link:
- <https://www.cotswold.gov.uk/media/1604668/ED083a-FINAL-SUMMARY-OF-MAIN-MODS-FOR-INSPECTOR-UPDATED-24052018.pdf>

² Cotswold District Council (June 2017) Cotswold District Local Plan: Statement of Consultation

4. Monitoring

Measures decided concerning monitoring

- 4.1 The SEA Regulations require that: "*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.*"
- 4.2 The Regulations also state that the SA Adoption Statement should set out "*...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*"
- 4.3 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan's objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA require data that is already being routinely collected at a local level by Cotswold District Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Plan.
- 4.4 **Table 4.1** therefore outlines a monitoring programme for measuring the Local Plan's implementation in relation to the areas where the SA has identified significant effects or where significant opportunities for an improvement in sustainability performance may arise. It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the Local Plan are achieved through the planning process.

Table 4.1: SA monitoring programme for the Cotswold District Local Plan

Area to be monitored	Indicator	Data source	Frequency of monitoring
Use of land	Percentage of development taking place on previously developed land	Cotswold District Council	Annual
Loss of the best and most versatile agricultural land	Number of hectares of land classified as Grade 1, 2 or 3a land sterilised by new development	Cotswold District Council	Annual
Effect of housing, employment and infrastructure provision on greenhouse gas emissions.	Carbon footprint of Cotswold District	Cotswold District Council	Annual
Effect on the delivery of renewable energy	Renewable energy installation capacity in MW	Cotswold District Council	Annual
Effects on landscape and townscape character	Percentage of new developments which are informed by detailed characterisation studies	Cotswold District Council	Annual
Sustainable waste management	Percentage of household waste recycled	Cotswold District Council	Annual
Employment in the traditional sectors of Cotswold District's economy	Number of people employed in agriculture and tourism	Cotswold District Council	Annual
Employment in emerging sectors of Cotswold District's economy	Number of people employed in emerging economic sectors	Cotswold District Council	Annual
Car use	Proportion of people travelling to work by public transport or walking and cycling	Cotswold District Council	Annual

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