

**Joanna Corbett**  
Cotswold District Council  
by email

Dear Jo,

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### Our reference

11703

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### Date

21 December 2023

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### Address

12th Floor, Beacon Tower  
Colston Street  
Bristol BS1 4XE  
Tel: 0117 389 0700

### Suitability of Jan 2022 HRA Scope for Local Plan Update

This letter is intended as a cover letter to the Habitats Regulations Assessment (HRA) Scoping Report (January 2022), for the Regulation 18 Consultation of the Cotswold Local Plan in 2024.

The Scoping Report sets out the key issues that would be assessed in the HRA of the Cotswold Local Plan and how that assessment would be carried out. The HRA Scoping Report has been previously published for consultation alongside the Local Plan Partial Update, as part of the Regulation 18 consultation in February and March 2022. However, since then, Cotswold District Council has decided to look at a development strategy from 2026 to 2041 in addition to the partial update of the plan's policies.

This letter considers the extent to which the methodology in the HRA Scoping Report remains appropriate for the current round of consultation, and whether there are any changes since January 2022 that will need to be taken into consideration in the HRA of the Local Plan Update.

### Changes to the Local Plan

The revised policies and development strategy for the Local Plan are still emerging; however the extension of the Plan period to 2041 means that it will plan for development (e.g. housing, employment and leisure), beyond the 2031 end point of the adopted Plan. At the time of writing, this includes c.7,400 dwellings. In comparison, the Scoping Report states that the Local Plan would "allocate more sites for housing, though these will be generally small in scale".

Emerging revisions to policy that have been identified since the Scoping Report was prepared include new policies relating to sustainable development and climate change mitigation/adaptation, small scale housing development (dwelling extensions/alterations, community-led housing, and homelessness housing), and a small number of policies for specific topics such as dark skies. There are also expected to be some revisions to the policy and supporting text for 'Biodiversity and Geodiversity: Designated Sites' that identify European sites that could be affected by development and provide some additional detail on impact pathways (e.g. recreational pressure, functionally linked habitats).

Despite the change in scale of development expected with the emerging Local Plan, the HRA methodology and key issues identified in the Scoping Report remain valid.

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### Work undertaken since Scoping Report

Work on various studies and mitigation strategies relating to recreation pressure have been progressed since the Scoping Report was prepared. These include:

- **Severn Estuary SAC, SPA & Ramsar site:** 2022 visitor survey work led by Stroud District Council, identifies a Zone of Influence (ZOI) for recreation pressure at the SAC, SPA & Ramsar site of 10.4km, which is a wider area than the 7.7km referenced in the Scoping Report (from the 2016 visitor survey). This brings more of Cotswold District within the ZOI.
- **Cotswold Beechwoods SAC:** Stroud District Council published its Recreation Mitigation Strategy for the SAC in May 2022; and Cotswold District Council will align with this, for example with developer contributions for SANG within the 15.4km ZOI. This is the same ZOI used in the Scoping Report.
- **Rodborough Common SAC:** Stroud District Council published its Recreation Mitigation Strategy for the SAC in May 2022; and Cotswold District Council will align with this. The strategy applies to residential development within 3km of the SAC, which is a smaller area than the 3.8km ZOI used in the Scoping Report.
- **North Meadow and Clattinger Farm SAC:** Cotswold District Council published an Interim Recreation Mitigation Strategy in May 2023. The interim strategy recognises that it will need to be updated as further analysis has been undertaken to assess visitor pressure impacts, and uses two ZOIs: 4.2km for local year round users (developer contributions required for management and monitoring measures at the SAC and off-site 'SANGs') and 4.2-9.4km for seasonal summer visitors (developer contributions for management and monitoring, although SANGs may be required for larger developments). The Scoping Report used a ZOI of 8km.

The HRA of the Local Plan will therefore need to reflect these revised ZOIs and the evidence and consultation underpinning the strategies. The overall approach set out in the Scoping Report remains valid, however.

### Next steps

Following the next Regulation 18 consultation on the Local Plan and once the Local Plan policies and site allocations are available, HRA Screening and Appropriate Assessment will be undertaken of the Local Plan.

Yours sincerely



Katherine Sydney  
Associate Planner  
katherine.sydney@landuse.co.uk