AECOM

Strategic Environmental Assessment (SEA) for the Stow on the Wold & The Swells Neighbourhood Plan

Environmental Report Update

June 2023

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Quality information

Prepared by	Checked by	Verified by	Approved by
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Revision History

Revision	Revision date	Details	Name	Position
V1	20 June 2023	First draft for QB review	EC	ONeill Homer (planning consultant on behalf of the QB).
V2	20 June 2023	Final draft for submission	CB	Principal Environmental Planner

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Non-Technical Summary (NTS)

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Stow on the Wold & The Swells Neighbourhood Plan (SSNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the SSNP is a legal requirement[1]. This is a Non-Technical Summary (NTS) of the SEA Environmental Report Update.

The SSNP is being prepared by the Parish Council in the context of the adopted Cotswold District Local Plan and emerging Local Plan Partial Update. Once 'made' the SSNP will have material weight when deciding on planning applications, alongside the Local Plan.

This Environmental Report Update accompanies the submission version of the SSNP, is the latest document to be produced as part of the SEA process. It has been updated to reflect the minor changes made to the SSNP following consultation on the Regulation 14 'pre-submission' version of the Plan undertaken in February 2023 and seeks to respond to the consultation responses relevant to the SEA.

Structure of the Environmental Report/ this NTS

SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). In creating a structured approach, SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
   - i.e., in relation to exploring and appraising 'reasonable alternatives' (as prescribed by the SEA Regulations[2]).
2. What are the SEA findings at this stage?
   - i.e., in relation to the draft plan that is being consulted on.
3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

[1] Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or, b) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The SSNP was subject to screening in 2019 where Cotswold District Council determined SEA is required.

[2] The SEA Regulations are not prescriptive as to what constitutes reasonable alternatives but identifies that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes, and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*" considering the plan objectives and geographical scope.

What is the Plan seeking to achieve?

The SSNP has established the following vision for the neighbourhood area in 2031:

> "*The unique townscape and environment of Stow and Swell parishes and the AONB have been conserved and enhanced. The community now has a better supply of market and affordable housing of a variety of types to meet its needs, which has led to a higher proportion of young people living in the town. Preventing new homes being used for second homes has also made a difference.*
>
> *The town's economy has diversified with new small businesses and home workers, although its tourism appeal remains vital. The Market Square is now less dominated by parking with its public realm being significantly improved. Its public car parks are well used and have encouraged visitors to walk to the Market Square. The town has also benefited from its new community hub building, which has complemented its longstanding community facilities.*
>
> *The Swells have retained their special rural Cotswolds character. Little has changed but Lower Swell has benefited from improved car parking arrangements for local residents*."

The following four key objectives of the Neighbourhood Plan have been identified to support this vision:

4. To ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced.
5. To ensure that the community has an adequate supply of affordable housing to meet its needs.
6. To secure and develop the town's economy.
7. To ensure that the community has appropriate infrastructure in terms of health services, community facilities, traffic and parking, public transport, and its green infrastructure.

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The SEA framework is presented below.

SEA theme	SEA objective
Biodiversity	• Protect and enhance all biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.
Climate change	• Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding. • Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area.
Landscape	• Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area.

SEA theme	SEA objective
Historic environment	• Protect and enhance the significance of the historic environment, heritage assets (both designated and non-designated) and their settings.
Land, soil, and water resources	• Ensure the efficient and effective use of land. • Use and manage water resources in a sustainable manner.
Health and wellbeing	• Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Population and communities	• Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. • Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types, and tenures.
Transportation	• Promote sustainable transport use and reduce the need to travel

Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, **Part 1** of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or alternative sites/ growth options.

Specifically, **Part 1** of the report -

1. Explains the process of establishing the reasonable alternatives.
2. Presents the outcomes of assessing the reasonable alternatives.
3. Explains reasons for establishing the preferred option, in light of the assessment.

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- SSNP vision and objectives, particularly the housing objective to ensure that the community has an adequate supply of affordable housing to meet its needs.
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders, as demonstrated through the recent Regulation 14 consultation; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Establishing the reasonable alternatives

The Environmental Report (Chapter 5) explains how reasonable alternatives were established after the process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

This work identified the following four options:

- **Option 1**: Allocate one or more small sites from the choices of Sites 1, 2, 3, and 4. This option could potentially deliver a proportion of affordable housing needs within the neighbourhood area (except at Site 1) and would rely on unmet needs being met outside of the neighbourhood area.
- **Option 2**: Allocate one or more medium sites from the choices of Sites 5, 8, and 11. This option could deliver a proportion of affordable housing needs at individual sites or could cumulatively deliver against most of the identified affordable housing needs. There will likely be unmet affordable housing needs that would need to be met outside of the neighbourhood area (though likely to a lesser extent than Option 1).
- **Option 3**: Allocate the strategic site at northeast Stow to deliver 100 market homes, 70 affordable homes, a new carpark, and a new community centre. This option would likely meet and deliver affordable housing needs within the neighbourhood area.
- **Option 4**: Allocate the strategic site at Oddington Road to deliver circa 70 affordable new homes and 76 market homes, and a new community centre. This option would likely meet and deliver affordable housing needs within the neighbourhood area.

Assessing the reasonable alternatives

The main report (Chapter 6) assesses these options and presents detailed findings for the SEA themes. For each of the options, the assessment examines the likely significant effects on the baseline, drawing on the sustainability themes and objectives established through scoping. Green is used to indicate significant positive effects, whilst red is used to indicate significant negative effects. Where appropriate, uncertainty will also be noted (in grey).

Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. Numbers are used to highlight the option or options that are preferred from an SEA perspective, with 1 performing the best.

The following conclusions are reached in the assessment of these options:

SEA theme	Rank and likely significant effects			
	Option 1: Sites 1, 2, 3, & 4	Option 2: Sites 5, 8, & 11	Option 3: Sites 6 & 7	Option 4: Sites 9 & 10
Biodiversity	2	1	1	1
Climate change	=	=	=	=
Landscape	1	2	3	3
Historic environment	=	=	=	=
Land, soil, and water resources	1	1	2	2
Health and wellbeing	2	2	1	1
Population and communities	4	3	1	2
Transportation	1	3	2	2

Developing the preferred approach

The Parish Council's reasons for developing the preferred approach are:

> *"Following community consultation and development of the evidence base, including the SEA, the Steering Group identify the preferred option for development at the land northeast of Stow (Option 2), as this option will best meet the vision and objectives to plot a course to a different, more sustainable future and deliver against plan aims for a new community hub and additional carparking. The scheme would secure both market and affordable housing for which there is a need in Stow to shift its demographic profile, economic base and self-sustainability.*
>
> *Such benefits have not been identified as viable through Option 1, and a community preference for Option 2 over Option 3 has been identified."*

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the Submission version of the SSNP. Assessment findings are presented as a series of narratives under the 'SEA framework' topic headings. The following conclusions are reached:

Conclusions

Overall, the appraisal has served to highlight a range of potential effects in implementing the SSNP. **Significant negative effects** are predicted in relation to the land, soil, and water resources theme, which reflects the permanent loss of greenfield and agricultural land at the proposed site allocation.

Significant positive effects are predicted in relation to the population and communities theme, which reflects the significant delivery of new housing targeted at meeting locally identified needs alongside a new community hub building and improved parking provisions which seek to improve the town centre experience. These efforts, alongside measures to connect development and improve active travel, are also considered likely to lead to minor long-term positive effects in relation to the health and wellbeing SEA theme.

With limited biodiversity constraints in the neighbourhood area and policy measures which seek a 20% biodiversity net gain in new development (higher than the national standard), minor positive effects are also predicted in relation to the biodiversity SEA theme.

The landscape and heritage setting reflect key constraints for development in Stow and the Swells and whilst the SSNP seeks a high-quality, landscape-led approach to development, residual minor landscape impacts are predicted, and uncertainty is noted in relation to historic environment impacts. Recommendations have been made which seek to reduce this uncertainty (see below).

Both minor negative and minor positive effects are concluded in relation to climate change. The SSNP places great emphasis on high-quality design and efficiency standards in development, adopted a 'zero carbon ready' approach. However, the lack of direct rail connectivity reduces the potential to improve per capita emissions in the short to medium term and may conflict with the district carbon neutral goals and declared climate emergency to some degree.

The potential for both positive and negative effects in relation to transport are identified. The relatively large-scale site allocation site is likely to impact upon traffic and congestion locally (the extent to which remains uncertain), but wider measures to improve car parking, the town centre public realm, and active travel networks are likely to be more beneficial.

Recommendations

The following recommendations have been made:

- The large-scale development proposed ultimately has the potential to impact upon the historic environment and the SSNP seeks to mitigate these impacts with a strong focus on high-quality design that is landscape-led and integrates with the historic AONB setting. Whilst this is likely to reduce the significance of effects (supported by wider local and national planning policy) the residual effects **remain uncertain** at this stage. To reduce uncertainty, the SSNP should consult with the Battlefields Trust and could seek to strengthen the mitigation provided by Policy SSNP7 by acknowledging the identified heritage constraints as key design considerations, and by directing development to the northern extent of the site where heritage sensitivities are reduced. Directing development to the northern extent of the site will also reduce the potential for impacts in relation to water quality, given that waterbodies intersect the southern extent of the site.
- The site allocation policy provisions could be enhanced with extended requirements for design features that also improve water efficiency (alongside energy efficiency).

Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

Following consultation, responses received have been considered and the SSNP and SEA Environmental Report have been updated and finalised for submission.

Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the plan will then be subject to a referendum, organised by Cotswold District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for Cotswold, covering the defined neighbourhood area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Cotswold District Council as part of the process of preparing its Annual Monitoring Report (AMR). Predicted significant effects in implementing the SSNP relate to the loss of greenfield and likely high-quality agricultural land, this loss will be recorded by Cotswold District Council and is not expected to increase or change over the plan period. No additional monitoring is therefore proposed.

1. Introduction

Background

1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Stow on the Wold & The Swells Neighbourhood Plan (SSNP).

1.2 The SSNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012 and in the context of the adopted Cotswold District Local Plan and emerging Local Plan Partial Update. Once 'made' the SSNP will have material weight when deciding on planning applications, alongside the Local Plan.

1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the SSNP is a legal requirement.[3]

SEA explained

1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.

1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that *"identifies, describes and evaluates"* the likely significant effects of implementing "*the plan, and reasonable alternatives*".[4] The report must then be considered, alongside consultation responses, when finalising the plan.

1.6 More specifically, the Report must answer the following three questions:

4. What has plan-making/ SEA involved up to this point?
   - including in relation to 'reasonable alternatives'.
5. What are the SEA findings at this stage?
   - i.e., in relation to the draft plan.
6. What happens next?

[3] Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: a) an environmental report; or, b) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The SSNP was subject to screening in 2019 where Cotswold District Council determined SEA is required.

[4] Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

This Environmental Report

1.7 This report is the Environmental Report for the SSNP. It accompanies the submission version of the Neighbourhood Plan. The Environmental Report has been updated to reflect changes made to the SSNP following Regulation 14 consultation (undertaken in February 2023) and seeks to respond to the consultation responses relevant to the SEA.

1.8 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.[5] Each question is answered within a discrete 'part' of the report. However, before answering Q1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

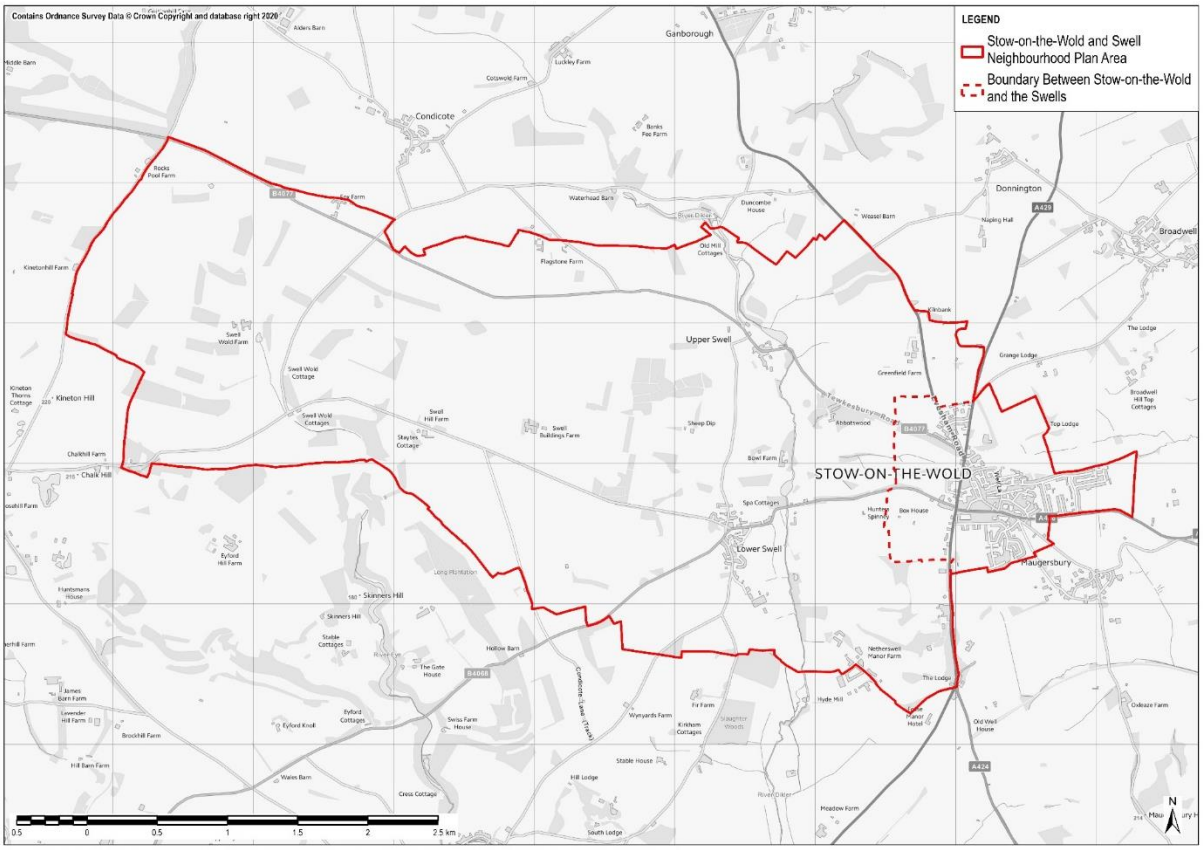
[5] See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Introduction

2.1 This section considers the strategic planning policy context provided by the adopted Cotswold District Local Plan and the emerging Local Plan Partial Review, before then presenting the vision and objectives of the SSNP. **Figure 2.1** below presents the neighbourhood area.

Figure 2.1: Stow on the Wold & The Swells neighbourhood area



Strategic planning policy context

2.2 The adopted Cotswold District Local Plan identifies Stow on the Wold as a Principal Settlement forming part of the Mid Cotswolds sub-area.

2.3 Policy S13 is specific to the town and encourages improvements to community and tourism facilities, particularly supporting the development of a town museum and the provision of a new community facility. The Local Plan further seeks to enhance the town centre, particularly by addressing car parking and congestion problems in the town. Policy SA2 specifically seeks improvements at Unicorn junction (A436/ B4068) in Stow.

2.4 The Local Plan does not propose any housing or employment sites for development within the neighbourhood area. Beyond the Principal Settlements, the rest of Cotswold District is essentially considered to comprise open countryside containing rural settlements which are largely not considered to be sustainable locations for further development, though Policy DS3 does

allow for small-scale development within these areas based on certain criteria being met.

2.5 The emerging Local Plan Partial Review is at early stages of development, with consultation on 'issues and options' concluding most recently back in March 2022. At this stage, there are no specific proposals in relation to the neighbourhood area in terms of a housing needs figure or development locations.

SSNP vision and objectives

2.6 The SSNP has established the following vision for the neighbourhood area in 2031:

"*The unique townscape and environment of Stow and Swell parishes and the AONB have been conserved and enhanced. The community now has a better supply of market and affordable housing of a variety of types to meet its needs, which has led to a higher proportion of young people living in the town. Preventing new homes being used for second homes has also made a difference.*

The town's economy has diversified with new small businesses and home workers, although its tourism appeal remains vital. The Market Square is now less dominated by parking with its public realm being significantly improved. Its public car parks are well used and have encouraged visitors to walk to the Market Square. The town has also benefited from its new community hub building, which has complemented its longstanding community facilities.

The Swells have retained their special rural Cotswolds character. Little has changed but Lower Swell has benefited from improved car parking arrangements for local residents."

2.7 The following four key objectives of the Neighbourhood Plan have been identified to support this vision:

1. To ensure that the unique townscape and environment of the town and the surrounding parish is conserved and enhanced.
2. To ensure that the community has an adequate supply of affordable housing to meet its needs.
3. To secure and develop the town's economy.
4. To ensure that the community has appropriate infrastructure in terms of health services, community facilities, traffic and parking, public transport, and its green infrastructure.

3. What is the scope of the SEA?

Introduction

3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives.

Consultation

3.2 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.[6] As such, these authorities were consulted between December 2020 and January 2021. Responses were received from Historic England and Natural England, neither of whom had any specific comments to make. No response was received from the Environment Agency.

The SEA framework

3.3 The SEA scope is summarised in a list of themes and objectives, known as the SEA framework. **Table 3.1** presents the SEA framework as consulted upon in early 2021.

[6] These consultation bodies were selected *"by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes"* (SEA Directive, Article 6(3)).

Table 3.1: SEA framework

SEA theme	SEA objective
Biodiversity	• Protect and enhance all biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.
Climate change	• Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding. • Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area.
Landscape	• Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan area.
Historic environment	• Protect and enhance the significance of the historic environment, heritage assets (both designated and non-designated) and their settings.
Land, soil, and water resources	• Ensure the efficient and effective use of land. • Use and manage water resources in a sustainable manner.
Health and wellbeing	• Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Population and communities	• Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. • Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types, and tenures.
Transportation	• Promote sustainable transport use and reduce the need to travel

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

4.1 Whilst work on the SSNP has been underway for some time, the aim here is not to provide a comprehensive explanation of all the work carried out to date, but rather to explain work undertaken to develop and appraise reasonable alternatives at this, submission stage. This section has been updated following Regulation 14 consultation, specifically to address concerns raised through consultation in relation to the SEA.

4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites. Land is currently being identified to meet locally identified housing needs, particularly affordable housing needs, and a range of considerations for the SSNP and SEA have been raised in consultation in relation to the preferred allocation site at the Land northeast of Stow.

Why focus on development sites?

4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- SSNP vision and objectives, particularly the housing objective to ensure that the community has an adequate supply of affordable housing to meet its needs.
- Housing growth is known to be a matter of key interest amongst residents and other stakeholders, as demonstrated through the recent Regulation 14 consultation: and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

4.4 Wider thematic policy, including policies relating to housing tenures and principal ownership are explored in Part 2 (What are the SEA findings at this stage) of the Environmental Report, as part of the proposed policy framework.

Structure of this part of the report

4.5 This part of the report is structured as follows:

- **Chapter 5** - explains the process of establishing reasonable alternatives.
- **Chapter 6** - presents the outcomes of appraising reasonable alternatives; and
- **Chapter 7** - explains reasons for selecting the preferred option, considering the appraisal.

5. Establishing reasonable alternatives

Introduction

5.1 The aim here is to explain the process that led to the establishment of alternative sites and thereby present "*an outline of the reasons for selecting the alternatives dealt with*".[7]

5.2 Specifically, there is a need to explain the strategic parameters that have a bearing on the establishment of options (in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the SSNP). These parameters are then drawn together in order to arrive at 'reasonable alternatives'.

Strategic parameters

5.3 The adopted Local Plan provides the main strategic framework for the development of the SSNP at this stage, recognising that the emerging Partial Review is still in early stages of development. The Local Plan does not identify any strategic development needs within the neighbourhood area that require meeting over the plan period. Despite this, it does recognise a series of measures that will be supported in Stow, including:

- The development of a museum
- The development of a new community facility
- The relocation of car parking from the town centre
- Improvement to Unicorn junction (A436/ B4068)
- Small-scale retail/ service development within the town centre

5.4 In developing the SSNP, a Housing Needs Assessment (HNA) has also been produced (2022), which identifies that whilst the town has an above average number of affordable homes in its current stock, this still falls short of meeting local affordable housing needs. The HNA estimates a minimum of 37 affordable homes are required over the plan period to 2031.

[7] Schedule 2(8) of the SEA Regulations

Site options

5.5 A total of eleven potential development sites have been identified through the plan-making process, ten of which are in Stow (but outside of the development boundary) and one is within The Swells; see **Figure 5.1**. The eleven sites were investigated through supporting site assessments[8], which provided a view as to whether the sites were potentially suitable as allocations in the SSNP. This work found the following two sites as 'unsuitable for allocation':

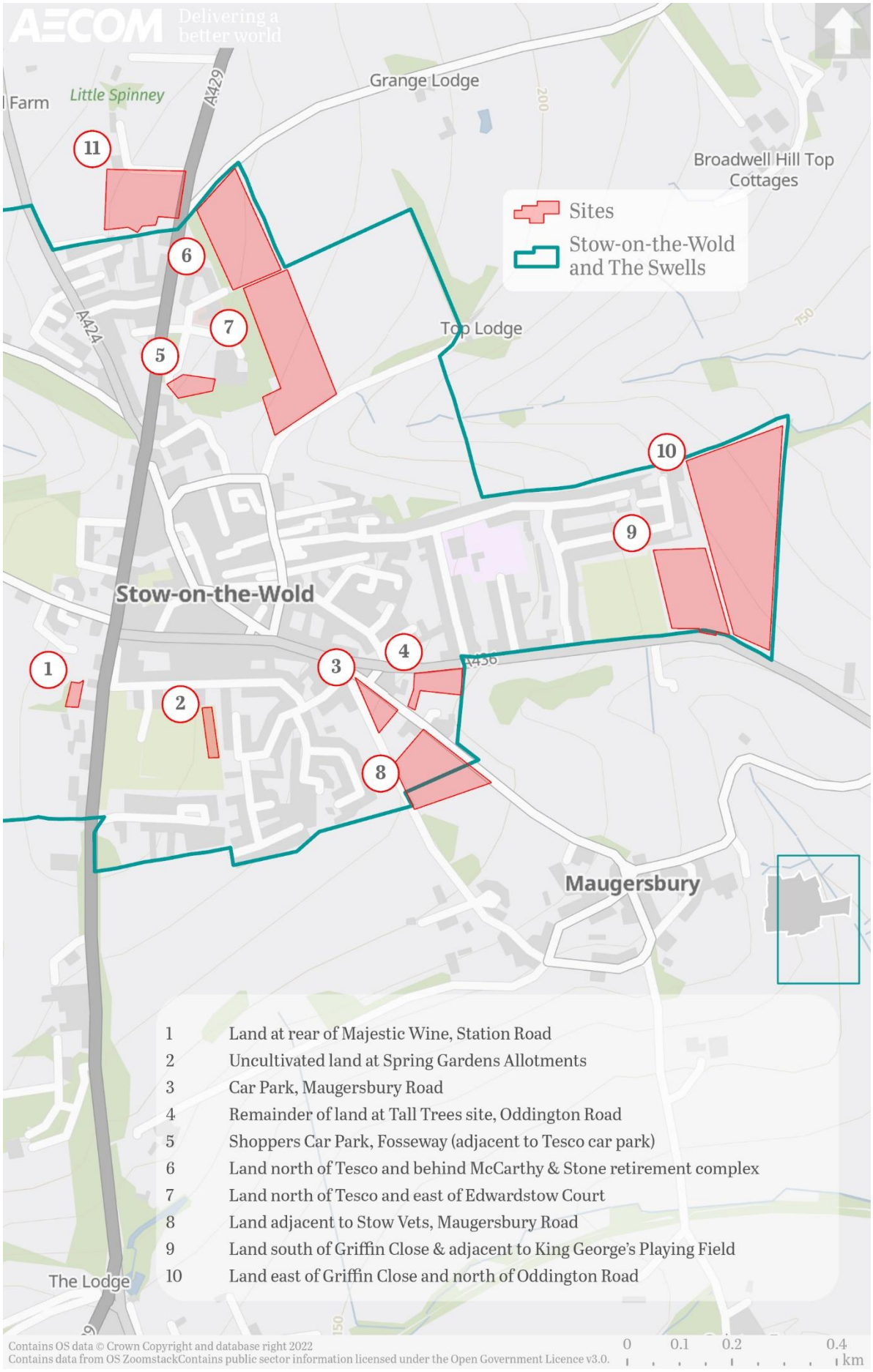
- Site 6 (Land north of Tesco store and behind McCarthy & Stone retirement complex – Hawkesbury Place, Fosseway): this site was considered unsuitable as an allocation due to environmental factors such as impact on AONB landscape and ecology.
- Site 8 (Adjacent to Stow Vets, Maugersbury Road): this site was considered unsuitable as an allocation given the environmental sensitivity of the site and the importance of trees protected by TPOs (Tree Preservation Orders) on-site.

5.6 Of the remaining nine sites, two were found to be 'suitable for allocation' (Site 5 and Site 7) and seven were found to be 'potentially suitable for allocation' subject to mitigation (Sites 1, 2, 3, 4, 9, 10, and 11).

5.7 All sites were consulted upon with the community in March 2020 and were reconsidered to incorporate considerations of the potential to include new community infrastructure (not just housing). Site 6 emerged as the preferred site for development locally, closely followed by Site 7, Site 1, and Site 4. However, it is recognised that the consultation had a relatively low response rate.

[8] Undertaken by the NP Steering Group and a standalone assessment of housing potential only.

Figure 5.1: SSNP site options



Arriving at reasonable alternatives

5.8 It is recognised that there is the option for the SSNP to not allocate any sites for development. Whilst this option is available to the group, it represents a continuation of the baseline, where no significant deviations from the baseline (i.e., significant effects) would be considered likely. The option has also been assessed by the Local Plan Sustainability Appraisal (SA), as it represents the current adopted approach laid out in the Local Plan. On this basis, the option is not considered to form a reasonable alternative for assessment, given it will add little in terms of considerations for the plan-maker, particularly within this scenario where the plan is seeking to allocate sites for housing development to address a locally identified need for affordable homes.

5.9 None of the eleven identified sites are being discounted at this stage, reflecting the community preferences emerging from consultation juxtaposed with the site assessment findings. Clear choices do emerge however, in terms of whether development is directed to small-scale or larger-scale sites. With the aim of delivering affordable housing, it is recognised that sites will need to be of a sufficient scale to deliver a proportion of affordable housing on-site, alongside enabling market housing.

5.10 Sites 1-4 are small-scale development sites of less than one hectare. Whilst development could contribute to affordable housing needs on-site, estimating circa. 20 dwellings per hectare, it is unlikely that the outlined affordable housing needs for circa. 40 affordable homes would be met through a package of small sites alone. A package of small sites was not deemed a reasonable option to assess on this basis in the Regulation 14 SEA consultation document, however, consultation responses, particularly from CDC (Cotswold District Council), propose the alternative to partially deliver against housing needs within the plan area, and leave unmet needs to be met outside of the plan area (for example in Moreton-in-Marsh) should be tested. The option of allocating small sites only, would also avoid major development in the AONB.

5.11 Sites 5, 8, and 11 are between 1ha and 1.5ha (medium scale) and would also need to be considered in combination to deliver against the affordable housing needs (recognising the need for enabling market housing alongside). The scale of development across these three sites could cumulatively contribute to meeting the objective to deliver against affordable housing needs, or any individual site could contribute in part to meeting needs within the plan area and there could be a proportion of unmet needs to be delivered elsewhere. Either of these options would again avoid major development in the AONB.

5.12 Sites 6 and 7, and Sites 9 and 10, lie adjacent to each other, both with a single landowner. The sites can be combined to form large-scale (strategic) development sites, that would deliver a significant contribution of affordable housing (likely meeting the identified needs in full and potentially exceeding them). However, these sites would constitute major development within the AONB. Notably, early indicative plans for these large sites were put to the community; see **Figures 5.2 and 5.3**.

Figure 5.2: Early Indicative plan for Sites 6 and 7[9]

Figure 5.3: Indicative plan for Sites 9 and 10

[9] Plans have since been updated.

5.13 Whilst recognising that there could be multiple feasible combinations of small and medium-sized sites, for assessment purposes four options are identified. The options have been expanded since previous consultation to include consideration of a proportion of affordable housing needs being met outside of the neighbourhood area. The four options are:

- **Option 1**: Allocate one or more small sites from the choices of Sites 1, 2, 3, and 4. This option could potentially deliver a proportion of affordable housing needs within the neighbourhood area (except at Site 1) and would rely on unmet needs being met outside of the neighbourhood area.
- **Option 2**: Allocate one or more medium sites from the choices of Sites 5, 8, and 11. This option could deliver a proportion of affordable housing needs at individual sites or could cumulatively deliver against most of the identified affordable housing needs. There will likely be unmet affordable housing needs that would need to be met outside of the neighbourhood area (though likely to a lesser extent than Option 1).
- **Option 3**: Allocate the strategic site at northeast Stow to deliver 100 market homes, 70 affordable homes, a new carpark, and a new community centre. This option would likely meet and deliver affordable housing needs within the neighbourhood area.
- **Option 4**: Allocate the strategic site at Oddington Road to deliver circa 70 affordable new homes and 76 market homes, and a new community centre. This option would likely meet and deliver affordable housing needs within the neighbourhood area.

5.14 Table 5.1 seeks to add clarity.

Table 5.1: SSNP reasonable alternatives

Site reference	Size (ha)	Estimated number of homes	Option 1	Option 2	Option 3	Option 4
Site 1	0.11	2	Allocate	-	-	-
Site 2	0.5	10	Allocate	-	-	-
Site 3	0.25	5	Allocate	-	-	-
Site 4	0.7	7	Allocate	-	-	-
Site 5	1.2	25	-	Allocate	-	-
Sites 6 & 7 (combined)	24.33/ 6.76*	170	-	-	Allocate	-
Site 8	1.41	30	-	Allocate	-	-
Sites 9 & 10 (combined)	7.41	146	-	-	-	Allocate
Site 11	1.49	30	-	Allocate	-	-
Total Homes			24	85	170	146

*****_Residential area of the site_

6. Assessing reasonable alternatives

6.1 As outlined in the previous section, the following options are established as alternative options for the purposes of the SEA:

- **Option 1**: Allocate one or more small sites from the choices of Sites 1, 2, 3, and 4. This option could potentially deliver a proportion of affordable housing needs within the neighbourhood area (except at Site 1) and would rely on unmet needs being met outside of the neighbourhood area.
- **Option 2**: Allocate one or more medium sites from the choices of Sites 5, 8, and 11. This option could deliver a proportion of affordable housing needs at individual sites or could cumulatively deliver against most of the identified affordable housing needs. There will likely be unmet affordable housing needs that would need to be met outside of the neighbourhood area (though likely to a lesser extent than Option 1).
- **Option 3**: Allocate the strategic site at northeast Stow to deliver 100 market homes, 70 affordable homes, a new carpark, and a new community centre. This option would likely meet and deliver affordable housing needs within the neighbourhood area.
- **Option 4**: Allocate the strategic site at Oddington Road to deliver circa 70 affordable new homes and 76 market homes, and a new community centre. This option would likely meet and deliver affordable housing needs within the neighbourhood area.

Methodology

6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Significant effects are indicated in red (negative) or green (positive). Where appropriate uncertainty will also be noted with grey shading.

6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a significant effect, this is made explicit in the appraisal text.

6.4 Efforts are also made to comment on the relative merits of the alternatives in more general terms and to indicate **a rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of significant effects. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. An 'equals' sign ("**=**") indicates options are ranked on par with each other and occurs when no significant/ meaningful differences can be drawn between options.

6.5 Finally, it is important to note that effects are predicted pre-mitigation (policy-off approach) and considering the criteria presented within Regulations.[10] So, for example, account is taken of the duration, frequency, and reversibility of effects.

[10] Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 20004.

Assessment findings

Table 6.1: Summary findings

SEA theme	Rank and likely significant effects			
	Option 1: Sites 1, 2, 3, & 4	Option 2: Sites 5, 8, & 11	Option 3: Sites 6 & 7	Option 4: Sites 9 & 10
Biodiversity	2	1	1	1
Climate change	=	=	=	=
Landscape	1	2	3	3
Historic environment	=	=	=	=
Land, soil, and water resources	1	1	2	2
Health and wellbeing	2	2	1	1
Population and communities	4	3	1	2
Transportation	1	3	2	2

Biodiversity

6.6 None of the options are constrained by internationally designated sites or captured as a potential risk for nearby nationally designated Sites of Special Scientific Interest (SSSIs). There is a network of deciduous woodland Priority Habitats across the neighbourhood area which intersects/ borders Options 2 (Site 5) and 3 around Tesco and south of Shoppers Carpark. The habitat is likely to be retained in development under either option. Option 2 (Site 5) falls within a National Habitat Network Enhancement Zone 2, whilst Option 1 (Sites 2 and 4), Option 2 (Sites 8 and 11) and Option 3 fall within a National Habitat Network Expansion Zone. Development under any option has good potential to support network enhancement/ expansion objectives at the sites. Most notably, Option 1 (Site 2) currently comprises allotment land which is likely to hold biodiversity values. Development at this site could also lead to disturbance effects in relation to the remaining adjacent allotment land. For these reasons, Options 2, 3, and 4 are considered to rank marginally more favourably to Option 1 overall. However, no significant effects are anticipated under any option.

Climate change

6.7 With regards to climate change, none of the options lie within an area of high fluvial flood risk and none of the options are constrained by areas of high surface water flood risk on-site. Option 1 (Sites 3 and 4) intersects, and Option 2 (Sites 5 and 8) lies near to, areas of low and medium surface water flood risk and would benefit from sustainable drainage systems that provide resilience and consider potential future flood risk.

6.8 Option 1 promotes sites mostly within the settlement area, maximising connectivity in this respect. Options 2, 3, and 4 are settlement edge options that connect well with the town and its offer with opportunities to promote active travel. Notably, Options 1 (Sites 3 and 4) and 2 (Site 8) connect well with Stow Surgery, Options 2 (Site 5) and 3 connect well with the supermarket, and Option 4 lies adjacent to King Georges Playing Field and close to Stow's primary school.

6.9 Whilst strategic development sites (Options 3 and 4) offer greater potential to deliver climate efficiency measures (through economies of scale) there is no evidence to indicate any particular or significant opportunities at any of the sites or locations under consideration.

6.10 Overall, no significant effects are considered likely and there are no significant differences between the options which are judged to perform broadly on par.

Landscape

6.11 With regards to landscape impacts all options would deliver development within the AONB. However, Options 1 and 2 avoid major development within the AONB, with the largest schemes under Option 2 delivering up to 30 homes. Option 3 and 4 constitute major development within the AONB.

6.12 Option 1 would allocate small sites mostly within the settlement area. Under this option, Sites 2, 3, and 4 largely avoid impacts in relation to the surrounding countryside, being mostly surrounding by existing development. Site 1 is adjacent to the settlement boundary in the west and whilst views to the countryside between Stow-on-the-Wold and Lower Swell are screened by existing hedgerow, the site is considered slightly more sensitive in this respect.

6.13 Option 2 includes a brownfield site (Site 5 The Shoppers Carpark) where regeneration of the site could be beneficial for the immediate townscape and the site falls within the settlement boundary. Option 2 (Sites 8 and 11) are settlement expansion sites, where most notably Site 8 lies in the southeast approach to the town from Maugersbury and Site 11 lies on the Fosse Way approach from the north. Development at these sites has the potential to affect entryways/ approaches to the town.

6.14 Options 3 and 4 are large-scale (strategic) development sites within the AONB. Option 3 is set back from the main Fosse Road but may affect views into the town from the north. Option 4 lies on the A436 approach into the town from the east.

6.15 Options 2, 3, and 4 have the potential to affect gateway locations and views into/ out of the town, as settlement edge locations, and the potential for negative effects of significance is therefore identified. Significant negative effects are considered less likely under Option 1. For this reason, Option 1 is ranked most favourably in relation to this SEA theme. As Options 3 and 4 constitute major development in the AONB, these options are ranked least favourably.

Historic environment

6.16 The historic environment is a key sensitivity for any development in the neighbourhood area. Of note, Option 1 (Site 3) lies within the Conservation Area, and Option 1 (Sites 1 and 4) adjoin/ lie close to the Conservation Area, with Site 1 lying opposite the listed buildings at Wraggs Row. Option 2 (Site 5), and Option 3 adjoin the Conservation Area at Well Lane and lie close to Abbotswood Grade II* Registered Park and Garden. Option 2 (Site 11) lies entirely within the Conservation Area in the south. Option 3 further intersects a Scheduled Monument in the southwest (the prehistoric enclosure known as Stow Camp) and a Grade II Listed Building in the south (St Edward's (Stow) Well), though it is noted that no housing development is being proposed within this area of the site. Option 4 lies further east of the settlement area and is not immediately constrained by designated assets. It is set back from the Conservation Area but visible from the southern extent of the Conservation Area at Maugersbury Park.

6.17 Under all options, the potential for negative effects of significance is recognised at this stage (pre-mitigation) given the sensitivity and significance of the assets surrounding (or within) the sites and their settings. None of the options are ranked more favourably than another at this stage, recognising the sensitivity of each option, and detailed mitigation plans would assist in assessing potential residual effects.

Land, soil, and water resources

6.18 All options would result in the loss of greenfield land; however, Option 1 (Site 3) and Option 2 (Site 5) utilise an element of brownfield regeneration making them both rank most favourably in relation to this SEA theme. Also of note, Option 1 (Site 1 and Site 4 in part) are identified as current wasteland. Options 3 and 4 are pasture/ arable land in agricultural use and Option 2 (Sites 8 and 11) includes equine grazing land. The options do not intersect waterbodies. No significant effects in relation to soil resources are anticipated under Options 1 and 2, however, the extent of the loss of productive agricultural land under Options 3 and 4 is considered for potential negative effects of significance.

Health and wellbeing

6.19 All options have the potential to support residents with active travel opportunities as inner settlement or settlement edge development sites that connect with existing infrastructure. Option 1 (Sites 3 and 4) provide excellent connections with Stow surgery, and Option 4 performs notably well by providing future residents with excellent access to the King George Play Park adjacent and the nearby primary school (with good potential to promote walking/ cycling in daily trips) as well as Stow Surgery.

6.20 Whilst recognising that existing footpath connections within and surrounding Stow are limited, all sites under all options could also provide good access to the surrounding countryside.

6.21 As strategic development sites, Options 3 and 4 provide good opportunities to support infrastructure development (e.g., new footpaths) and wellbeing features (such as new green spaces) through economies of scale. Notably, these two options have greater potential that Options 1 and 2 to deliver against wider plan

aims for a new community hub. Significant positive effects are associated with such development benefits. The site under Option 3 also lies adjacent to the supermarket with good potential to promote walking/ cycling in frequent trips.

6.22 Option 2 disperses development more widely across the settlement, with sites in the north (Sites 5 and 11) also connecting well with the supermarket, and the site in the south (Site 8) connecting relatively well with the primary school, open spaces, and Stow Surgery.

6.23 Overall, significant positive effects are considered more likely under Options 3 and 4 which have good potential to deliver positive health outcomes like new footpaths and open space. For this reason, these options rank more favourably than Options 1 and 2 (where no significant effects are anticipated).

Population and communities

6.24 All options contribute new housing that will ultimately be targeted at redressing housing stock imbalances and positive effects for local communities are anticipated in this respect. The greater the housing contribution, the greater these positive effects are likely to be, and the strategic (large-scale) sites under Options 3 and 4 are considered more likely to contribute significantly in terms of on-site affordable housing provisions. With a reliance on meeting unmet affordable housing needs outside of the plan area under Option 1, the positive effects are considered less likely to be of significance (i.e., minor). This similarly applies to Option 2, though notably, the option could cumulatively deliver positive effects of significance.

6.25 All sites under all options connect relatively well with the existing settlement area; with sites in the north (Option 2 – Sites 5 and 11, and Option 3) connecting well with the town centre and supermarket, and sites in the south (Option 1, Option 2 – Site 8, and Option 4) connecting well with open space, the primary school, and Stow Surgery.

6.26 Further of note, the scale of the development sites under Options 3 and 4 provide significantly greater potential to deliver against wider plan aims for additional carparking space and a new community hub. This potential notably increases the significance of the anticipated positive effects and makes these options rank more favourably than Options 1 and 2. Option 3 is ranked most favourably due to its potential to deliver both a new community hub and a new carpark centrally. Option 1 is ranked least favourably as only minor positive effects are anticipated as a result of a smaller contribution to meeting affordable housing needs within the neighbourhood area.

Transportation

6.27 With regards to road traffic impacts there is the argument that the higher the level of development, the greater the road traffic impacts would be. However, this is compared with the argument that strategic development (larger-scale development) has greater potential, through economies of scale, to deliver mitigation and new infrastructure that supports alternatives to the private car.

6.28 Options 1 and 2 disperse development across small or medium-scale development sites. Development under Option 2 (Sites 5 and 11) in the north of the settlement provide good access to the supermarket and connect well with the main road through the settlement (the Fosse Way). Bus connections are

provided at Tesco and along High Street. Development under Option 1 and Option 2 (Site 8) in the south connects relatively well with the primary school, GP, and open spaces, as well as the A436/ Chapel Street approach into town. Bus stops are nearby at Park Street/ Sheep Street.

6.29 Option 3 performs broadly like other sites in the north of the settlement providing excellent access to the supermarket and bus connections here. Option 4 is further east of the settlement area connecting well with the primary school and GP. Bus connections are provided at the adjacent King George Play Park and further along at Park Street.

6.30 Overall, whilst all sites under consideration connect well with the settlement area, negative effects are still considered likely through increased vehicle usage and associated traffic and congestion impacts (exacerbated by through travel and tourism). At small sites (Option 1) this is less likely to be of significance and Option 1 is ranked most favourably accordingly. At medium or large sites (Option 2, 3, and 4), it is not certain at this stage whether such effects would be significant (thus overall uncertainty is noted), however, it is considered likely that significant effects could be avoided once mitigation measures are factored in. As strategic development sites with greater potential to provide such mitigation (including new carparking connecting with the central area and a new community hub delivering local workspace), Options 3 and 4 are ranked more favourably than Option 2.

7. Developing the preferred approach

7.1 The Parish Council's reasons for developing the preferred approach considering the alternatives assessment are identified below:

"Following community consultation and development of the evidence base, including the SEA, the Steering Group identify the preferred option for development at the land northeast of Stow (Option 3), as this option will best meet the vision and objectives to plot a course to a different, more sustainable future and deliver against plan aims for a new community hub and additional carparking. The scheme would secure both market and affordable housing for which there is a need in Stow to shift its demographic profile, economic base, and self-sustainability.

Such benefits have not been identified as viable through Options 1 and 2, and a community preference for Option 3 over Option 4 has been identified."

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the SSNP. This chapter presents:

- An appraisal of the submission version of the SSNP under the eight SEA topic headings.
- Consideration of potential cumulative effects; and
- The overall conclusions at this current stage.

Plan policies

8.2 The SSNP puts forward 16 policies to guide development in the neighbourhood area, as identified in **Table 8.1**.

Table 8.1: SSNP policies

Policy reference	Policy name
SSNP1	The Stow on the Wold Development Boundary
SSNP2	Development in The Swells and the Countryside
SSNP3	Housing Mix
SSNP4	Principal Residence
SSNP5	Specialist Accommodation for Older People in Stow
SSNP6	Health and Well Being
SSNP7	Land North East of Stow
SSNP8	Stow Town Centre & Market Square
SSNP9	Playing Field Facilities
SSNP10	Local Green Spaces
SSNP11	Stow and the Swells Design Code
SSNP12	Non Designated Heritage Assets
SSNP13	Zero Carbon Buildings
SSNP14	Walking & Cycling in the Town and Parish
SSNP15	Vehicle Parking
SSNP16	Digital Infrastructure

Methodology

8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.

8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Assessment of the draft plan

Introduction

9.1 The draft plan contents, aims, and objectives are summarised, and the assessment is presented under the eight SEA themes established through scoping (see **Table 3.1**). Consideration is also given to cumulative effects. A final section (**Chapter 10**) then presents overall conclusions and any recommendations.

Plan contents, aims, and objectives

9.2 Stow on the Wold is an ancient Cotswold market town positioned at the convergence of eight historic trackways (now busy roads). Swell Parish was formed in 1935 by the amalgamation of Upper and Lower Swell, both small villages lying just west of Stow. The neighbourhood area covering both Stow and Swell lies entirely within the Cotswold Area of Outstanding Natural Beauty (AONB), a nationally valued landscape. The River Dikler runs through Upper and Lower Swell (to join the River Windrush) and is prone to flooding. Landscape impacts and flood risk present key environmental challenges for future development in the neighbourhood area.

9.3 Many of the buildings in Stow are typified by Cotswold limestone from local quarries, and the historic core of the town is a Conservation Area within which many of the buildings are listed. Stow's architecture and range of independent shops and services continue to attract tourism. There is a recognised local desire to make the historic town square more pedestrian friendly, and the SSNP seeks to address this through additional off-street parking that will reduce the current impact of on-street parking.

9.4 With regards to the communities that form the neighbourhood area, the SSNP recognises the proportion of young people (particularly those aged 18 and under) has been declining in recent years, whilst the proportion of older people (aged 65 and over) is significantly increasing. This presents challenges in terms of social and physical infrastructure and achieving a balanced housing mix. This has also been exacerbated by recent developments outside the Stow development boundary, all of which have been restricted to retirement living and have significantly increased the proportion of elderly residents forming the community.

9.5 Whilst residents enjoy the countryside setting, this also presents challenges for the community with high levels of second home ownership and/ or holiday rentals that have increased parking pressures and continue to drive up both property and rental values. High property and rental values juxtaposed with low incomes is a key driver behind younger people leaving the area and drives up emissions as many of those who work in Stow commute from the wider area. A key thread to the SSNP is therefore addressing an under-provision of affordable housing (particularly social rented housing) over the plan period.

9.6 The SSNP proposes 16 policies focused largely on housing provisions and the location of development (SSNP1 – 7), but also supporting the role and function of the town centre and Market Square (SSNP8), addressing parking issues and enhancing active travel opportunities (SSNP14 – 15), retaining local green

spaces and recreational facilities (SSNP9 – 10), and guiding high-quality design in development (SSNP11 – 16). Policy SSNP7 proposes one key strategic development site at the 'Land North East of Stow' that will deliver 100 market homes and 70 affordable homes.

Biodiversity

9.7 Whilst the SSNP proposes a significant development site delivering 170 new homes (Policy SSNP7), the neighbourhood area is not constrained by proximity to internationally designated sites, hence why the SSNP was screened out of requiring Habitats Regulations Assessment (HRA) Appropriate Assessment (AA).

9.8 With regards to nationally designated biodiversity, again the plan area is not significantly constrained. New Park Quarry SSSI (Site of Special Scientific Interest) lies north of Upper Swell, but residential development is not captured as a potential risk indicator in the identified SSSI Impact Risk Zone intersecting the neighbourhood area.

9.9 Grassland and woodland habitats are dispersed across the neighbourhood area, and most notably, woodland habitats intersect the border of the proposed development site in the west and the south. It will be important that these be retained and enhanced. The Living England Habitat Map[11] identifies the site is predominantly formed of arable and horticultural land, and the National Habitat Network identifies the whole site as a 'Network Expansion Zone' where the land is considered likely to be suitable for habitat creation and/ or opportunities for connecting and linking up locations across a landscape.

9.10 Whilst biodiversity constraints are not considered to be significant, it is recognised that the proposed development provides an opportunity to enhance and expand habitats on-site, linked to existing habitats as part of a Network Expansion Zone and deliver positive effects in this respect. The SSNP captures this opportunity in the policy framework, with Policy SSNP7 identifying requirements for 20% demonstrable biodiversity net gain onsite (higher than the emerging national requirement for 10%) and to avoid any loss of existing mature trees and hedgerow on-site (alongside reinstating historic hedgerows). Furthermore, the policy seeks development which replaces non-native tree species with native species. This is in the context of the wider policy framework which seeks high-quality development with integrated health and wellbeing considerations, including access to nature and allotments, native tree planting, and landscaping schemes.

9.11 Considering the above, **minor positive effects** are considered most likely in the long-term because of an enhanced effort to deliver biodiversity net gains at the strategic development site and integrate biodiversity considerations into future growth.

Climate change

9.12 With regards to climate change, a key consideration for plan-making is accessible development that provides travel choices, including active travel options as a key means to reducing per capita emissions. Whilst it is

[11] Available through DEFRAs Magic Map Application

recognised that the SSNP is delivering more homes than planned for through the adopted Local Plan, the effects on absolute emissions are minimised to some degree through the recognition that Stow has a relatively generous town centre offer which is supported by bus transport connections (with the closest train station outside of the neighbourhood area in Moreton-in-Marsh to the north).

9.13 The proposed development site is considered relatively accessible, with excellent connections to the town's supermarket. Bus connections are provided at the supermarket and slightly further afield along the High Street. Policy SSNP7 requires an active travel strategy in development proposals at the site that creates new pedestrian routes. Furthermore, a transport strategy is sought that implements road schemes and access improvements specific to the constraints of the location. The site is not located within a fluvial floodplain but does intersect small areas/ a channel of medium and high surface water flood risk in the southern extent of the site. The provisions of national and local planning policy should ensure appropriate onsite drainage systems are delivered that mitigate any potential negative effects and there is not considered a need to repeat this policy in the SSNP.

9.14 Wider policy provisions in the SSNP will also support more sustainable transport options. Notably, Policy SSNP7, working alongside Policies SSNP8 and SSNP15, seek to reduce the impact of parking, particularly within the town centre. Coinciding with measures to improve the public realm there is good potential to improve the attractiveness of active travel within and around the central area.

9.15 Also of note are the benefits of the provisions of Policy SSNP13 which seek 'zero carbon ready' development (echoed in Policy SSNP7) where buildings are designed to reduce energy consumption, increase efficiency, and support long-term resilience.

9.16 Considering the above, no significant deviations from the baseline are anticipated, however, it is recognised that Stow lacks direct rail access limiting its sustainable transport connections/ offer. Development at the proposed scale may conflict to some degree with Cotswold District Council's climate emergency objectives to become a carbon neutral county by 2045 (with an 80% reduction against a 1990 baseline by 2030) and **minor negative effects** are considered likely in this respect. **Minor positive effects** are also concluded in relation to the policy directions for 'zero carbon ready' development, which will help facilitate future changes.

Landscape

9.17 With regards to landscape, it is recognised that any future development in the neighbourhood area is constrained by its location within the Cotswold Area of Outstanding Natural Beauty (AONB). The SSNP works towards a vision that sees the special rural Cotswold character retained and the unique townscape conserved and enhanced, whilst accommodating growth that will support community needs.

9.18 The SSNP proposes a large-scale development site in the northeast of the settlement area (Policy SSNP7) delivering around 170 new homes across a large stretch of open greenfield land adjoining the settlement edge.

Development at the site is likely to affect views into/ from Stow and potentially views across the wider AONB landscape too. Policy SSNP7 requires a design strategy informed by a clear understanding of both the Cotswold and Stow Design Codes (as echoed through the dedicated Policy SSNP11) and a layout and landscaping scheme that successfully mitigates the effects of development on the AONB countryside to the east. Specifically, development on-site is also expected to acknowledge the views across the site south-eastwards from Broadwell Lane. Design principles are also laid out for the new carpark and community hub as part of landscape-led design.

9.19 Wider plan policies also support an improved townscape with provisions to maintain/ increase active ground floor frontages at Market Square (Policy SSNP8), ensure commercial and retail development enhances the special architectural and historic character of the town centre (and Conservation Area) (Policy SSNP8), support replacement pavilion facilities at Queen Elizabeth II Field and King George's Playing Field (Policy SSNP9), protect Local Green Spaces (Policy SSNP10), protect the significance of non-designated heritage assets (Policy SSNP12), and retain the transition to open countryside by identifying development boundaries (Policy SSNP1).

9.20 Overall, the large-scale greenfield development proposed will ultimately impact upon the existing landscape. However, the provisions of the SSNP seek to minimise this impact, particularly through a landscape-led approach to development underpinned by defined design codes specific to the local area and informed by the AONB Management Plan. As a result, **residual minor long-term negative effects** are concluded as most likely in relation to landscape.

Historic environment

9.21 With a wealth of heritage assets in the neighbourhood area, any growth strategy is considered constrained by the special setting of Stow and The Swells, including the land between the settlement areas which forms Abbotswood Registered Park and Garden. Furthermore, there are a wealth of archaeological finds across the neighbourhood area, as reflected by the number and broad spread of designated Scheduled Monuments. Additionally, the neighbourhood area lies adjacent to the Battle of Stow Registered Battlefield in the northeast.

9.22 The strategic development site proposed under Policy SSNP7 lies northeast of Stow, east of the Hawkesbury Place retirement homes and Tesco supermarket. The southwest border of the site adjoins the Stow-on-the-Wold and Maugersbury Conservation Area and lies near to Abbotswood Registered Park and Garden. The site further intersects a Scheduled Monument in the southwest (the prehistoric enclosure known as Stow Camp) and a Grade II Listed Building in the south (St Edward's (Stow) Well). Furthermore, Gloucestershire County Council highlight in recent consultation that advice from the Battlefields Trust should be sought as the precise location of the Stow Battlefield is uncertain.

9.23 Whilst the proposed policy framework does not outline these constraints to the site, it is recognised that the designated assets and their settings are afforded protection through the Local Plan and NPPF and there is no need to duplicate such policy intentions within the SSNP. Despite this, it is recommended that the

site allocation policy (Policy SSNP7) is updated to acknowledge these constraints as key design considerations for proposals and advice is sought from the Battlefields Trust as recommended by Gloucestershire County Council. The main way in which the SSNP mitigates the effects of development on the historic environment is through the proposed local design codes linked through Policy SSNP11, where landscape-led design proposals are sought which minimise impacts on the historic character and the designated Conservation Area.

9.24 Also of note, the SSNP proposes Policy SSNP12 which provides protections for non-designated heritage assets that contribute to the historic character of the settlement area.

9.25 Overall, the large-scale development proposed ultimately has the potential to impact upon the historic environment and the SSNP seeks to mitigate these impacts with a strong focus on high-quality design that is landscape-led and integrates with the historic AONB setting. Whilst this is likely to reduce the significance of effects (supported by wider local and national planning policy) the residual effects **remain uncertain** at this stage. To reduce uncertainty, the SSNP could seek to strengthen the mitigation provided by Policy SSNP7 by acknowledging the identified heritage constraints as key design considerations, and by directing development to the northern extent of the site where heritage sensitivities are reduced. The SSNP should also consult the Battlefields Trust in relation to the precise location of the Stow Battlefield.

Land, soil, and water resources

9.26 A key issue in relation to land and soil resources is the conflicting nature of additional growth and the need to protect greenfield land resources and high-quality soils. Productive agricultural land is a key resource, alongside mineral safeguarded areas, recognising that the settlement overlies key sandstone and limestone mineral resources.

9.27 The SSNP proposes one large-scale development site in the northeast of the settlement area formed of arable agricultural land (likely to be of high-quality), the loss of which has the potential for negative effects in relation to soil resources. The mineral safeguarded area is extensive, covering the settlement area, and whilst the site allocation falls within this, it is considered that negative effects are minimised by edge of settlement development (where mineral extraction is unlikely to take place).

9.28 In relation to water resources, whilst the development proposed through the SSNP is relatively large-scale, it is likely that effects on water resources will be marginal, recognising that water resources are managed at a catchment scale with management plans in place to deal with a growing population. Efforts to ensure high levels of water efficiency in new development will support water resource management and planning in the long-term, and Policy SSNP7 could be enhanced by requiring design features that improve both energy and water efficiency (recognising that the policy currently only refers to energy efficiency).

9.29 With regards to water quality, waterbodies associated with Caudwell Brook intersect the southern extent of the site, where measures will need to be included in development to avoid impacts arising. Whilst the provisions of the NPPF and Local Plan provide some protections for water quality (particularly in

terms of meeting the Water Framework Directive objectives), it is recognised that Policy SSNP7 could be enhanced with appropriate policy wording that protects the quality and function of the waterbodies intersecting the site. Noting that the current developer masterplan for the site includes recreational space in this area of the site, it would be beneficial for the policy to reiterate the need to direct development to the north of the site.

9.30 Overall, given the likely impacts to soil resources and agricultural land, **permanent significant negative effects** are considered likely. It will be for plan-makers to weight these impacts with competing SEA and plan objectives (such as the benefits of affordable housing delivery). It is further recognised that these impacts could be reduced by policy wording that specifically restricts development to a smaller proportion of the site (as indicated in the current masterplan).

Health and wellbeing

9.31 A key issue for the neighbourhood area is a recent significant increase in the proportion of elderly residents, with more people relying on high levels of accessibility and inclusivity which reduces isolation.

9.32 The SSNP dedicates Policy SSNP6 to health and wellbeing factors, recognising that development proposals need to demonstrate their support for positive health outcomes, including by encouraging active lifestyles and travel choices, reducing the impacts of vehicular traffic, incorporating high-quality design principles, and providing connectivity to green infrastructure networks.

9.33 The proposed allocation site under Policy SSNP7 is targeted at redressing housing imbalances, that will indirectly support demographic imbalances that are a key issue for the neighbourhood area now. Furthermore, the site is located close to key amenities and the policy provisions seek opportunities to encourage active travel and healthy lifestyles, with tenures targeting local needs. Proposals are further required to demonstrate design features that improve energy efficiency and reduce emissions as part of zero/ low carbon development, which can support community wellbeing in the long-term through reduced fuel poverty and increased resilience.

9.34 Access to nature is actively sought in development, including at the proposed allocation site, with policies reiterating a need to deliver biodiversity net gains in development and integrate with the wider network of green infrastructure. Additional measures seek to protect and enhance Local Green Space and recreational areas (Policies SSNP9 and SSNP10) and develop active travel networks (Policy SSNP14).

9.35 The policy provisions which seek positive health outcomes in future development are considered likely to lead to **minor long-term positive effects** overall.

Population and communities

9.36 There are key housing issues facing the communities of Stow and The Swells. There are two recognised issues associated with the housing mix in the neighbourhood area: being, a high level of second homes/ holiday rental homes, and recent developments delivering a significant number of retirement

homes. These factors have driven up both property and rental values such that many locals cannot afford to remain in the area. As a result, the proportion of younger residents is continually decreasing, and people who work in Stow generally commute in. Both young people and the local workforce are largely priced out of the local housing market or excluded from recent developments.

9.37 The SSNP seeks to address these issues, recognising that the delivery of new affordable homes provides a significant opportunity to redress the housing imbalance. First and foremost, the SSNP seeks a substantial housing development at the 'Land North East of Stow' (Policy SSNP7), with 100 open market homes enabling the delivery of an additional 70 affordable homes. Policy SSNP3 further seeks a 40% affordable housing proportion onsite in new developments of 6 or more homes on other sites. Policies SSNP3 and SSNP7 guide the tenure split and size mix of future housing, with an emphasis on social rented housing and 3/ 4-bed homes. The substantial provisions and high percentage requirement in future development is considered likely to support significant positive effects for communities in Stow and The Swells.

9.38 Policy SSNP5 seeks to limit the delivery of new specialist accommodation for older people over the plan period and align any further delivery of this housing type with local needs for affordability and locally connected residents. Policy SSNP4 further supports these efforts by seeking to place restrictions on new housing development to ensure their occupancy as a 'Principal Residence'; thus, restricting further growth in level of second home ownership in the neighbourhood area. CDC highlight through recent consultation, national measures that are emerging to support communities impacted by second home ownership and holiday lets, and the SSNP policy could be considered an additional measure to support such aims. Furthermore, the policy framework, particularly Policies SSNP7, SSNP11 and SSNP13, seek to embed high-quality design principles which will support inclusivity and community cohesion, supported further by policy provisions relating to health and wellbeing (Policy SSNP6) and access to local green spaces (SSNP10).

9.39 The development site 'Land North East of Stow' is also expected to deliver a new public car park and a new community hub building. The hub building will provide access to community shared space and small workspaces, which alongside Policy SSNP16 (seeking to improve digital infrastructure) should support communities, SMEs (Small and Medium Enterprises), and homeworking in the neighbourhood area. The additional car parking should also help reduce the impacts of on-street parking in the town centre, which alongside additional measures to improve the town centre public realm (Policy SSNP8) and enhance pedestrian and cycle networks (Policy SSNP14) should support communities with an enhanced service provision and town centre experience.

9.40 Considering these points, in particular the direct efforts to redress housing stock imbalances, **significant long-term positive effects** are predicted.

Transportation

9.41 The proposed development through the SSNP (Policy SSNP7) connects well with the main A-Road connections through the settlement, but will deliver an additional 170 homes, inevitably increasing traffic and congestion issues to some degree and negative impacts are considered likely as a result. The site is

relatively well connected to the town centre however, which will encourage the use of sustainable modes of transport to access key facilities and amenities.

9.42 The public car park scheme proposed at the development site 'Land North East of Stow' will provide significant benefits by way of reducing on-street parking and congestion in the town centre. At Market Square it is intended that freed up parking spaces be given over to public realm improvements (Policy SSNP8). Additional measures seek appropriate parking provisions elsewhere across the neighbourhood area (Policy SSNP15) and improvements to active travel networks (Policy SSNP14). Positive effects are likely to emerge as a result.

9.43 Overall, whilst **negative effects** are considered likely because of the large-scale development scheme and associated traffic increases, the extent of these effects remain **uncertain** at this stage (in the absence of appropriate traffic modelling evidence) but it is recognised that traffic and congestion issues within the settlement are exacerbated by through traffic and tourism which are a greater cause for concern that traffic generated by residents. **Minor positive effects** are also considered likely because of efforts to improve parking (and reduce congestion) within the town centre and Market Square.

Cumulative effects

9.44 The additional housing provisions of the SSNP will support the district's housing land supply over the plan period and positive cumulative effects are considered likely in this regard.

9.45 However, the SSNP will also contribute to the incremental loss of greenfield and agricultural land resources within the district, and this also has wider implications for its AONB setting.

10. Conclusions and recommendations

Conclusions

10.1 Overall, the appraisal has served to highlight a range of potential effects in implementing the SSNP. Significant negative effects are predicted in relation to the land, soil, and water resources theme, which reflects the permanent loss of greenfield and agricultural land at the proposed site allocation.

10.2 Significant positive effects are predicted in relation to the population and communities theme, which reflects the significant delivery of new housing targeted at meeting locally identified needs alongside a new community hub building and improved parking provisions which seek to improve the town centre experience. These efforts, alongside measures to connect development and improve active travel, are also considered likely to lead to minor long-term positive effects in relation to the health and wellbeing SEA theme.

10.3 With limited biodiversity constraints in the neighbourhood area and policy measures which seek a 20% biodiversity net gain in new development (higher than the national standard), minor positive effects are also predicted in relation to the biodiversity SEA theme.

10.4 The landscape and heritage setting reflect key constraints for development in Stow and the Swells and whilst the SSNP seeks a high-quality, landscape-led approach to development, residual minor landscape impacts are predicted, and uncertainty is noted in relation to historic environment impacts. Recommendations have been made which seek to reduce this uncertainty (see below).

10.5 Both minor negative and minor positive effects are concluded in relation to climate change. The SSNP places great emphasis on high-quality design and efficiency standards in development, adopted a ‘zero carbon ready’ approach. However, the lack of direct rail connectivity reduces the potential to improve per capita emissions in the short to medium term and may conflict with the district carbon neutral goals and declared climate emergency to some degree.

10.6 The potential for both positive and negative effects in relation to transport are identified. The relatively large-scale site allocation site is likely to impact upon traffic and congestion locally (the extent to which remains uncertain), but wider measures to improve car parking, the town centre public realm, and active travel networks are likely to be more beneficial.

Recommendations

10.7 The following recommendations have been made:

- The large-scale development proposed ultimately has the potential to impact upon the historic environment and the SSNP seeks to mitigate these impacts with a strong focus on high-quality design that is landscape-led and integrates with the historic AONB setting. Whilst this is likely to reduce the significance of effects (supported by wider local and national planning policy) the residual effects **remain uncertain** at this stage. To reduce uncertainty, the SSNP should consult with the Battlefields Trust and could

seek to strengthen the mitigation provided by Policy SSNP7 by acknowledging the identified heritage constraints as key design considerations, and by directing development to the northern extent of the site where heritage sensitivities are reduced. Directing development to the northern extent of the site will also reduce the potential for impacts in relation to water quality, given that waterbodies intersect the southern extent of the site.

- The site allocation policy provisions could be enhanced with extended requirements for design features that also improve water efficiency (alongside energy efficiency).

Part 3: What are the next steps?

11. Next steps

11.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

11.2 This Environmental Report accompanies the SSNP for submission to the Local Planning Authority, Cotswold District Council, for subsequent Independent Examination.

11.3 At Independent Examination, the SSNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

11.4 Assuming the examination leads to a favourable outcome, the SSNP will then be subject to a referendum, organised by Cotswold District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for Cotswold, covering the defined neighbourhood area.

Monitoring

11.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

11.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Cotswold District Council as part of the process of preparing its Annual Monitoring Report (AMR). Predicted significant effects in implementing the SSNP relate to the loss of greenfield and likely high-quality agricultural land, this loss will be recorded by Cotswold District Council and is not expected to increase or change over the plan period. No additional monitoring is therefore proposed in this respect. It is recommended that any work to identify the precise location of the Stow Battlefield is recorded and monitored and shared appropriately.

Appendices

Appendix A Regulatory requirements

As discussed in **Chapter 1**, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA-1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA-2** explains this interpretation. **Table AA-3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA-1 Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations… the Environmental Report must include…
Introduction	What's the plan seeking to achieve?		• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	• Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	• Key environmental problems / issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?		• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?		• The likely significant effects associated with the draft plan • The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		• A description of the monitoring measures envisaged

Table AA-2: Questions answered by this Environmental Report, in-line with regulatory requirements

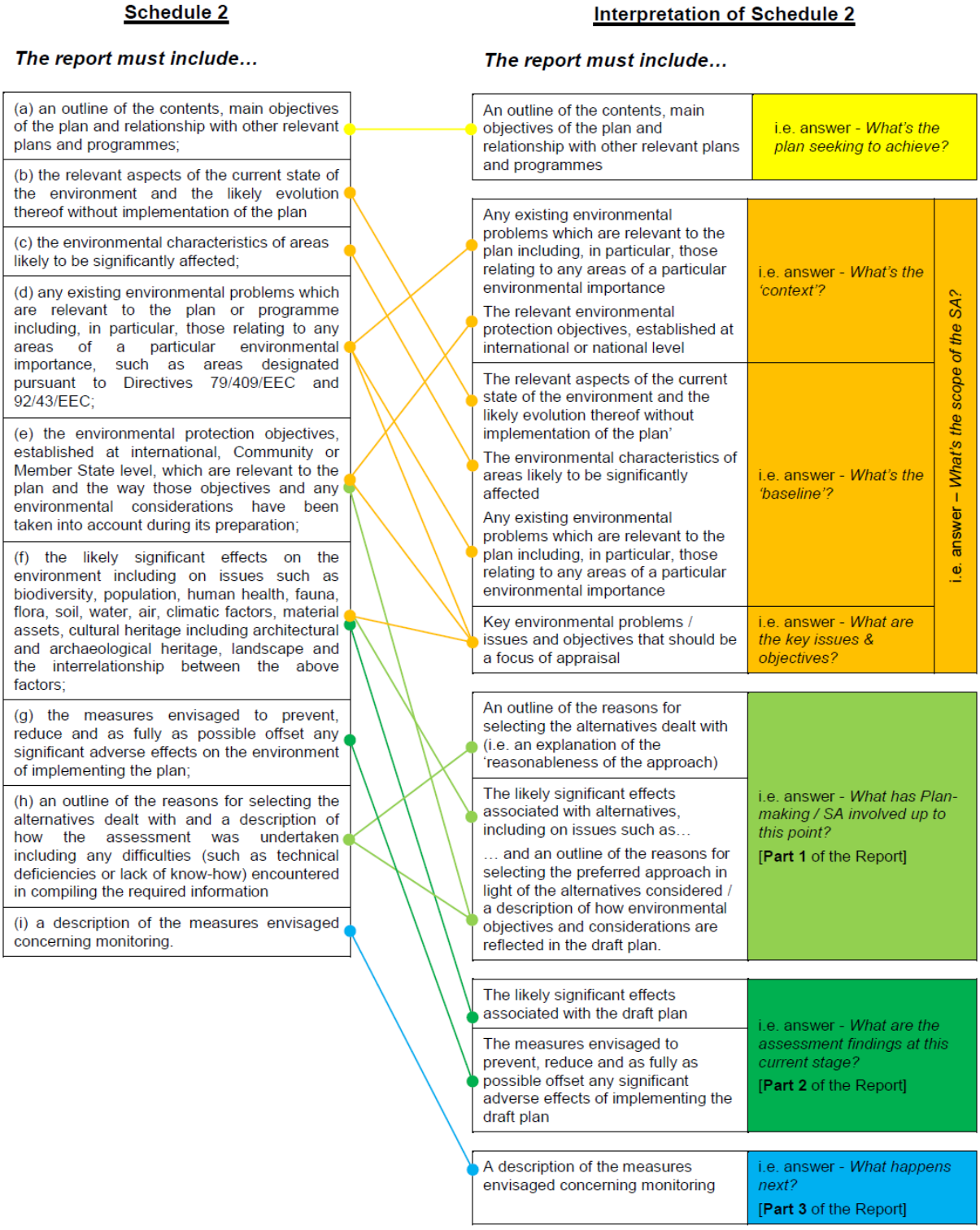


Table AA-3: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are, and/ or will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix B presents key messages from the context review. With regards to explaining "*how...considerations have been taken into account*", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on issues and options. Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in-light of alternatives assessment).

Regulatory requirement	Discussion of how requirement is met
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
The SA Report must be published alongside the Draft Plan, in accordance with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report Update is published alongside the 'submission' version of the SSNP, with a view to informing Regulation 16 consultation.
The SA must be considered, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.