



Cirencester Neighbourhood Plan

SEA Screening Opinion

Cotswold District Council

Final report

Prepared by LUC

October 2022

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Cirencester Neighbourhood Plan

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Chapter 1

Introduction

1.1 Cirencester Town Council is supporting the preparation of a Neighbourhood Plan, which is being prepared by a steering group comprising local people on behalf of the Town Council. The town of Cirencester is located within Cotswold District and includes part of the Cotswold National Landscape (formerly called the Cotswold Area of Outstanding Natural Beauty). The emerging Neighbourhood Plan covers the full extent of the electoral boundary of the Town Council, which includes eight wards of New Mills, Abbey, Watermoor, Chesterton, St Michael's, Stratton, Four Acres and the Beeches.

1.2 LUC has been appointed by Cotswold District Council to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the Neighbourhood Plan. SEA may be required for a Neighbourhood Plan if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to SEA but includes assessment of the likely significant effects of a plan or programme on economic and social factors, as well as environmental factors. Planning Practice Guidance (PPG) [\[See reference 1\]](#) clarifies that there is no legal requirement for a neighbourhood plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.

1.3 Cotswold District Council has commissioned LUC to carry out SEA Screening of the Pre-Submission Draft Cirencester Neighbourhood Plan (September 2022) in order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), transposed into UK law through the SEA Regulations [\[See reference 2\]](#).

Chapter 2

SEA Screening

Scope of the Cirencester

Neighbourhood Plan

2.1 In October 2018, Cirencester Town Council approached Cotswold District Council to have the electoral boundary designated as a neighbourhood area, so the Town Council could develop a Neighbourhood Plan. A Steering Group, made up of volunteers from the community and members of the Cirencester Town Council, has been involved in producing the current version of the Cirencester Neighbourhood Plan, the Pre-Submission (Regulation 14) Draft.

2.2 The Neighbourhood Plan covers the entire electoral boundary of Cirencester Town Council, which includes eight wards. The Pre-Submission Draft Neighbourhood Plan includes a vision for the long-term future of Cirencester along with 13 objectives:

1. Maintain, protect, and enhance the distinctive Cotswold-rich visual character, views and heritage of Cirencester, its immediate historic setting and vistas and its connections to the surrounding areas.
2. Require all new development to contribute to the 20 Minute Neighbourhood model of development through the creation of safe, sustainable, liveable, and mixed communities with active transport to jobs and essential services to meet the daily needs of the community.
3. Create a robust yet flexible network of streets and shared spaces that promote all modes of active travel leading to reduced reliance on private vehicles. To support this, there is a need for enhanced public transport and a mobility hub.

4. More effectively integrate the outlying residential areas (e.g., Kingshill, Kingsmeadow, Stratton, Chesterton) by foot, cycle, and public transport to the town centre, which are currently hindered by highway barriers and footpath gaps. The key barrier is that created by the A419 and A429 road system which wraps around Cirencester town centre, frustrating easy access to the middle from outlying residential areas and safe links to the surrounding countryside.
5. Facilitate a reduction in carbon emissions and contribute to achieving the national goal of Net Zero by adopting and implementing the relevant recommendations.
6. Protect, maintain, and enhance the natural environment, including local green spaces, parks, trees and green buffers, habitats, the River Churn, Gumstool Brook and all wildlife corridors alongside their connection to the wider landscape, promoting biodiversity and planting native species where possible.
7. Improve the sustainability of new build development through use of low carbon materials, construction methods and facilitate low carbon running carbon costs in accordance with the Cotswold Design Code.
8. Ensure that land made available for new developments better facilitates and maintains a vibrant connected, economically active, and sustainable Town Centre without adding to congestion or flood-risk.
9. Prioritise new residential development towards affordable homes and first time buyers and avoid age-specific residences.
10. Minimise future flood risk by protecting and, where possible, extending the functional floodplain. Require new developments to provide multifunctional mitigation measures, such as sustainable urban drainage systems, to ensure that rainwater is attenuated within the site. Support solutions to improve the management of the river flow on the upper Churn to reduce flooding and drying up.

11. Protect existing, and deliver new easily accessible, community infrastructure, including for primary health care, skills development, recreation, sport, leisure, and cultural enrichment, to fill existing gaps and support the future of Cirencester and its population growth.

12. Facilitate a reduction in noise and light pollution within the town and in new development whilst maintaining and improving air quality through a reduction in emissions.

13. Support skills development for local people.

2.3 The Neighbourhood Plan sets out 33 planning policies to realise and deliver the vision for Cirencester. These policies are contained within the following policy chapters: Access and Movement, Design and Built Environment, Quality of the Public Realm, Local Economy, Natural Environment and Wellbeing and Community.

2.4 No sites have been allocated for development within the Neighbourhood Plan, although various policies include criteria that will apply to any proposals for development. Policy DBE4 supports the provision of affordable housing integrated within residential developments, while Policy DBE5 requires that new developments include mechanisms to restrict the ownership and occupancy as a principal residence. Policy DBE3 requires new development to be designed to respond positively to the Cotswold vernacular and to the distinctive Cirencester context.

2.5 Other policies in the Neighbourhood Plan address a range of topics including the natural environment, green infrastructure, transport, heritage and the economy. Together these policies seek to ensure that new development in Cirencester is high quality and sensitively designed so as not to have adverse impacts on the surroundings and that it contributes positively to the public realm.

2.6 The final part of the Neighbourhood Plan lists Neighbourhood Plan Projects which are set out under the same categories as the policies.

Baseline Information

2.7 This section summarises baseline information for the town of Cirencester, drawing from the information set out in the Pre-Submission (Regulation 14) Draft Neighbourhood Plan.

Context

2.8 The town of Cirencester is located within Cotswold District and includes part of the Cotswold National Landscape. The Town Council electoral boundary, which the Neighbourhood Plan covers, includes eight wards: New Mills, Abbey, Watermoor, Chesterton, St Michael's, Stratton, Four Acres and the Beeches.

Biodiversity, Flora and Fauna

2.9 There are no Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar sites within Cirencester, the closest being North Meadow and Clattinger Farm SAC approximately 5.5km to the south, Cotswold Beechwoods SAC approximately 8.5km to the north west and Rodborough Common SAC approximately 10km to the west. Cotswold Water Park Site of Special Scientific Interest (SSSI) is 1.4km to the south and is in favourable condition, Daneway Banks SSSI lies 2km to the west of the Cirencester boundary and is in favourable condition, while Barnsley Warren SSSI is 2.8km to the north east and is in both favourable (60%) and unfavourable recovering (40%) condition.

2.10 Within Cotswold District as a whole there are over 260 locally designated Key Wildlife Sites.

Population

2.11 In 2018, Cirencester had a population of approximately 20,780 people. The town has a higher than average population of elderly people, with 22.1% of people being over the age of 65 compared to 18% nationally. The number of people aged 0-15 is lower than nationally, at 16.3% compared to 19.1% across England.

Human Health

2.12 The majority of Cirencester's residents are in good or very good health (82.9%) with a small proportion (4.1%) in bad to very bad health. Information from the 2011 Census indicates that the proportion of the Cirencester population that is in very good health (47.6%) is slightly lower than the Cotswold average (48.8%) but very slightly higher the England average (47.2%).

2.13 Cirencester has an ageing population which is likely to lead to more cases of residents suffering from age-related conditions such as dementia.

Soil

2.14 Around Cirencester town the land is classified as urban. Most of the rest of the plan area comprises Grade 3 agricultural land with small areas of Grade 2 agricultural land in the south, and a larger area of non-agricultural land in the west. It is not known whether the Grade 3 land comprises Grade 3a which is classed as high quality, or the lower quality Grade 3b.

2.15 The soil type in and around Cirencester is primarily shallow lime-rich soils over chalk or limestone.

Water

2.16 While the majority of the plan area is at very low risk of fluvial and surface water flooding, there are areas of flood zone 3 associated with the River Churn, which the town of Cirencester lies on the bank of. The areas of flood zone 3 cover extensive areas at Stratton meadow, Kingsmeadow, and alongside the inner bypass, effectively separating the main part of the town from Beeches, Kingshill, Bowling Green and Stratton and acting as a significant constraint to development. In the face of climate change, the risk of further surface water drainage problems is likely to increase.

Air and Climatic Factors

2.17 Air Quality in the Cotswold Area is generally very good. There are two Air Quality Management Areas (AQMA) within Cotswold District at Birdlip and Lechlade, both of which are approximately 15km from Cirencester. There are no AQMAs within Cirencester. Air quality monitoring, using a network of diffusion tubes to measure nitrogen dioxide (NO₂) levels, is undertaken throughout the District. The District's air quality monitoring shows that NO₂ levels during 2020 were below the National Air Quality Objective in all locations.

2.18 Climate data is not available at ward level, but within Cotswold District as a whole, reductions in overall carbon emissions of 30.3% were achieved between 2005 and 2019. This reduction is mostly due to progress in reducing emissions from domestic, followed by industry and commercial with minimal progress on public sector and transport. Transport makes the largest contribution to carbon emissions in Cotswold District.

Material Assets

2.19 Cirencester is well connected by road to its locality by the key routes of the A417 and the A429 that skirt the main settlement and run diagonally north to

south. Cirencester itself is not accessible by train, with the nearest station being at Kemble, around five miles away.

2.20 The town centre of Cirencester is characterised by a variety of shops from national retail chains to quaint independent stores that contribute to the town's character. The town centre comprises a number of different areas including Market Place which has recently been renovated to include a dedicated market space, the streets of Cricklade Street, Dyer Street and Castle Street that offer a range of retail stores, courtyard areas at The Old Post Office and a sheltered undercover area along Bishops Walk. The town centre has been facing pressures not only due to the Covid-19 pandemic but also due to competition from online shopping and its impacts on the high street.

2.21 Due to its historic environment, tourism is a major and growing part of Cirencester's local economy. However, if not properly managed, it could have adverse impacts on the environment and the daily life of local people.

2.22 Due mainly to Cirencester's popularity with tourists, the town has high second homes rates, with the Cotswold District having one of the highest rates of empty houses in England. There were 3,776 houses and flats in the District classed as second homes for council tax purposes as of October 2021. This means one in every 18 homes in Cotswold District were out of use. This issue is contributing to a lack of housing in Cirencester and creating pressure for new development sites to be built out to meet the local housing need.

Landscape

2.23 Wrapping around the northern and western edges of Cirencester is the Cotswold National Landscape (formally called the Area of Outstanding Natural Beauty, or AONB).

2.24 Cirencester falls within National Character Area 107: Cotswolds. The Cotswolds landscape consists of a steep slopes crowned by high, open uncultivated land with increasingly wooded valleys.

Cultural Heritage

2.25 Much of Cirencester is covered by four large Conservation Areas which act to protect many centuries of historic development within the town centre, around Cirencester Park, the Gloucester street and river walk, and to the south of the town.

2.26 Within the Cirencester Town Centre Conservation Area there are 179 listed buildings, two of which are Grade I listed, alongside nine grade II* listings and 168 Grade II listings. Cirencester Park, an impressive swathe of Grade I historic parkland, also lies to the west of the town.

SEA Screening

2.27 An assessment has been undertaken to determine whether the Pre-Submission (Regulation 14) Draft Cirencester Neighbourhood Plan (September 2022) requires SEA in accordance with the SEA Regulations.

2.28 Figure 2.1 overleaf presents the flow diagram entitled 'Application of the SEA Directive to plans and programmes' which is taken from the Practical Guide to the Strategic Environmental Assessment Directive, published in September 2005. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions).

Figure 2.1: Application of the SEA Directive to Plans and Programmes

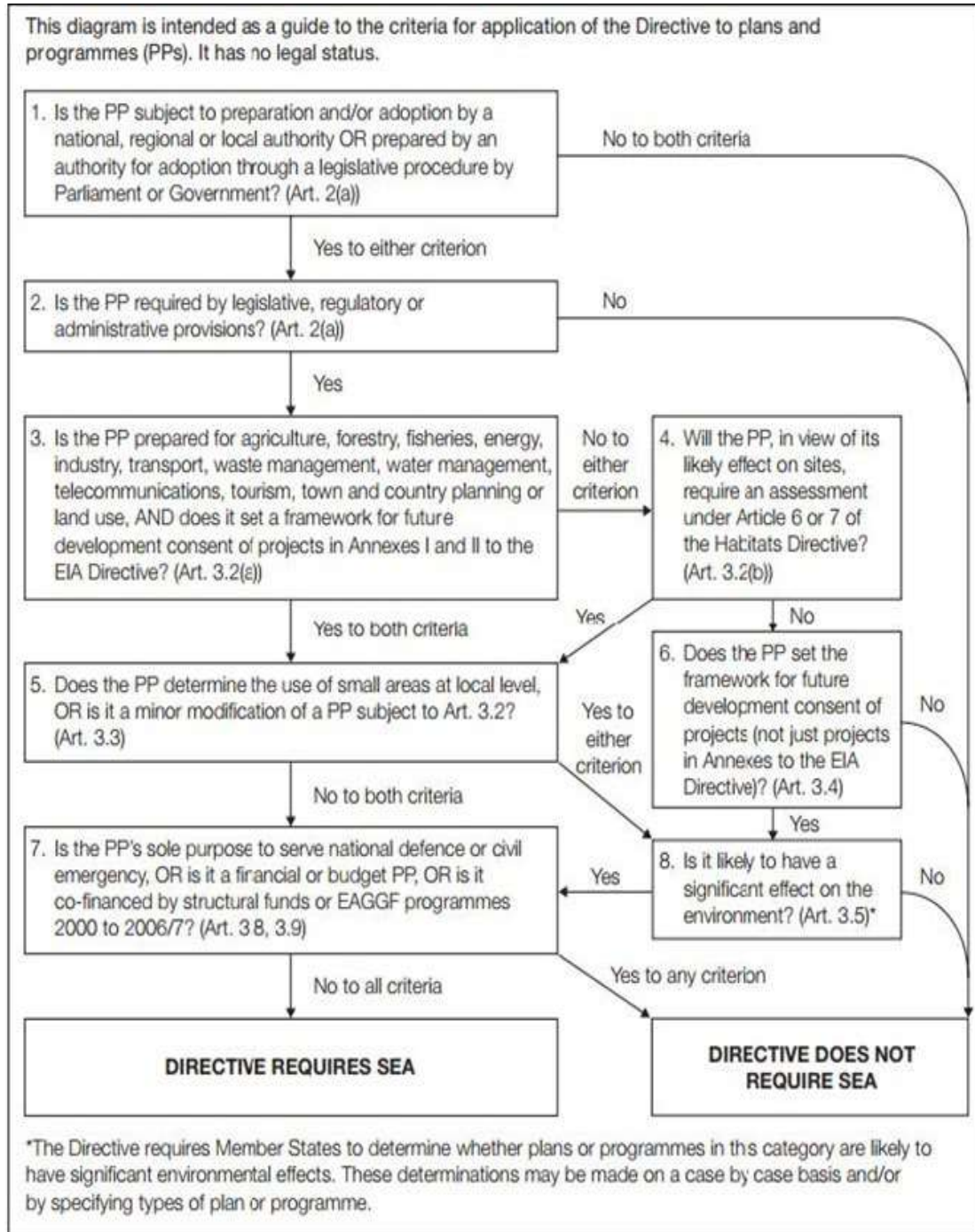


Table 2.1: Application of SEA Directive to the Cirencester Neighbourhood Plan

Stage	Yes/No	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The Cirencester Neighbourhood Plan is being prepared under the Localism Act 2011 and will be adopted ('made') by the Local Authority (Cotswold District Council) as part of the statutory development plan. Move to Q2.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The Cirencester Neighbourhood Plan is being prepared under the Localism Act 2011 and in accordance with the Neighbourhood Planning (General) Regulations 2012. However, there is no requirement to produce a Neighbourhood Plan; it is an optional plan. Once made it will become part of the statutory development plan. Therefore, it should continue to be screened. Move to Q3.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Yes and No	The Cirencester Neighbourhood Plan is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. Move to Q4.

Stage	Yes/No	Reason
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	HRA screening of the Cirencester Neighbourhood Plan has identified that there are no likely significant effects on European sites and an Appropriate Assessment is not required. No: Move to Q6.
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes and No	The Cirencester Neighbourhood Plan does not allocate sites for development; however it includes policies against which proposals for development within the plan area will be assessed. Move to Q8.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Table 2.2. SEA IS NOT REQUIRED

Table 2.2: Likely Significant Effects

SEA Requirement	Comments
The characteristics of the plans and programmes, having regard, in particular, to:	
1. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	Once made, the Cirencester Neighbourhood Plan will become part of the statutory development plan and will guide the delivery of development in Cirencester, including in terms of design. The Cirencester Neighbourhood Plan does not allocate sites for residential or other forms of development. The Cotswold District Local Plan 2011-2031 (adopted in August 2018) identifies Cirencester as the main focus for development and allocates new development sites in Cirencester through

SEA Requirement	Comments
	<p>Policy S1. These include two housing development sites, eight established employment sites, four mixed use development sites and a car parking site. A strategic site South of Chesterton, Cirencester, is also allocated through Policy S2 for up to 2,350 dwellings and around 9.1ha of employment land.</p> <p>The adopted Local Plan set the District's housing requirement to be 8,400 dwellings for the Plan period (2011 to 2031), an average of 420 dwellings a year. Since the Local Plan has been adopted the housing need has to be reassessed every five years based on national policy. The housing need is now 490 dwellings per annum. There is currently an insufficient housing land supply to deliver 490 dwellings a year between 2023 and 2031. It is currently estimated that this increase would require the allocation of sites capable of delivering around 700 to 900 additional dwellings by 2031.</p> <p>The emerging Cotswold District Local Plan Partial Update Regulation 18 'Issues and Options' was consulted on between 4th February and 20th March 2022. It is at an early stage in its preparation and does not yet set out information about housing figures.</p>
<p>2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy</p>	<p>The Cirencester Neighbourhood Plan has to be in general conformity with the local strategic framework (the adopted Cotswold District Local Plan 2011-2031 (2018) and the emerging Cotswold District Local Plan Partial Update). The Cirencester Neighbourhood Plan must also have regard to the National Planning Policy Framework. The Cirencester Neighbourhood Plan does not have influence over other plans. Once made, the Cirencester Neighbourhood Plan will form part of the statutory development plan for Cirencester and will be used in conjunction with the emerging Cotswold District Local Plan Partial Update (once adopted) and the adopted Cotswold District</p>

SEA Requirement	Comments
	Local Plan 2011-2031 to determine planning applications.
3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	One of the Basic Conditions which the Neighbourhood Plan must meet is to contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to Cirencester was described earlier in this chapter. Key issues of relevance to the Neighbourhood Plan are the presence of the Cotswold National Landscape within part of the plan area, local biodiversity assets and the variety of designated heritage assets.
5. The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	N/A
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
6. The probability, duration, frequency and reversibility of the effects.	The Cirencester Neighbourhood Plan does not allocate sites for housing or other forms of development. The Cirencester Neighbourhood Plan covers the period up to 2033. Effects of the Cirencester Neighbourhood Plan are expected to be indirect (due to not allocating sites) but long-term and permanent.
7. The cumulative nature of the effects.	Cumulative effects could result from the Cirencester Neighbourhood Plan in combination with development that takes place in the surrounding towns and villages, although the Cirencester Neighbourhood Plan does not allocate sites for housing or other forms of development. As the emerging Cotswold District Local Plan Partial Update is still in its

SEA Requirement	Comments
	<p>development, it is not yet possible to assess with certainty the amount and location of development that may result from the Plan within and close to Cirencester.</p> <p>The Cotswold District Local Plan 2011-2031 (adopted August 2018) allocates a number of new development sites in Cirencester, as detailed in row 1 above.</p>
<p>8. The transboundary nature of the effects.</p>	<p>The Neighbourhood Plan focuses on Cirencester only. Transboundary effects under the SEA Regulations refers transboundary effects on other EU Member States; therefore they are not relevant to the Neighbourhood Plan.</p>
<p>9. The risks to human health or the environment (e.g. due to accidents).</p>	<p>There are no anticipated risks to human health or the environment from the Cirencester Neighbourhood Plan.</p>
<p>10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).</p>	<p>The Cirencester Neighbourhood Plan covers all of Cirencester. The population of the town was estimated to be around 20,780 people as of 2018.</p>
<p>11. The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> ■ Special natural characteristics or cultural heritage; ■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use. 	<p>Cirencester is bordered by the Cotswold National Landscape. Cotswold Water Park SSSI, Daneway Banks SSSI and Barnsley Warren SSSIs are all within 3km of the plan area. There are numerous designated heritage features within Cirencester.</p>
<p>12. The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>Cirencester is directly adjacent to and includes parts of the Cotswold National Landscape.</p>

SEA Screening Conclusion

2.29 A screening assessment has been undertaken by applying the criteria from the SEA Directive and Schedule 1 of the SEA Regulations to determine whether or not the Cirencester Neighbourhood Plan is likely to have significant environmental effects when assessed against the topics listed in the SEA Regulations.

2.30 The Cirencester Neighbourhood Plan sets out a vision and detailed planning policies to shape development in the town up to 2033 and decision makers will need to consider the criteria of these policies when determining future applications in the town. However, it does not directly impact on land use through the allocation of sites for housing or other forms of development. While the final part of the Neighbourhood Plan lists Neighbourhood Plan Projects, none of these are allocations for built development.

2.31 On this basis, it is considered that the Cirencester Neighbourhood Plan is unlikely to have significant environmental effects and that full SEA is therefore not required.

Next Steps

2.32 This SEA Screening Report will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC

October 2022

References

- 1 <https://www.gov.uk/government/collections/planning-practice-guidance>
- 2 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

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