

Integrated Impact Assessment (IIA) for the Cotswold District Local Plan 2026-2043

IIA Report to accompany Regulation 19 consultation on the Cotswold District Local Plan 2026-2043

Cotswold District Council

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Quality information

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Front cover: Bibury Cottages in the Cotswolds (cropped)

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Non-Technical Summary

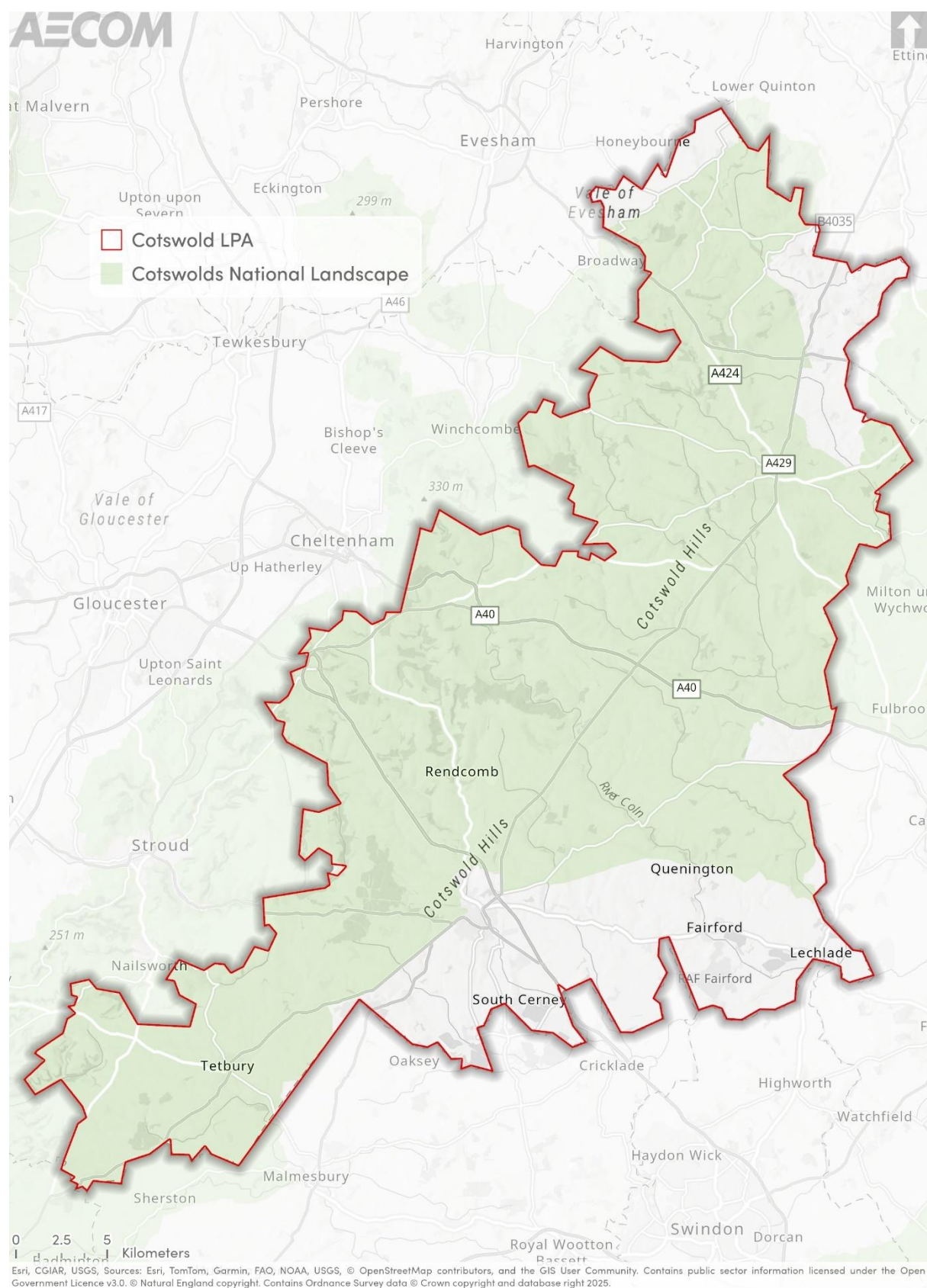
The Non-Technical Summary has been prepared separately as a stand-alone document accompanying the full IIA Report.

1. Introduction

1.1. Background

- 1.1.1 AECOM is commissioned to undertake an Integrated Impact Assessment (IIA), incorporating Strategic Environmental Assessment / Sustainability Appraisal, Health Impact Assessment, and Equalities Impact Assessment, in support of the emerging Cotswold District Local Plan 2026-2043 ("the Plan"), which is being prepared by Cotswold District Council (CDC).
- 1.1.2 This IIA Report is the latest document to be produced as part of the IIA process and accompanies the Regulation 19 consultation for the Plan, undertaken for a period of six weeks between 24th August 2026 and 5th October 2026.
- 1.1.3 Once adopted, the Plan will set the strategy for growth and change for the district up to 2043, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.4 The area covered by the Plan is shown in **Figure 1-1** and encompasses Cotswold District. The Cotswolds National Landscape (formerly Area of Outstanding Natural Beauty) overlaps with approximately 80% of the district.

Figure 1-1: Cotswold District



1.2. IIA explained

- 1.2.1 IIA fulfils the requirements for Sustainability Appraisal (SA) and discharges the duties for Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).
- 1.2.2 IIA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of IIA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the IIA for the Plan seeks to maximise its contribution to sustainable development and the quality of life of residents.
- 1.2.3 The approach is to fully integrate these components and issues to provide a single assessment process to inform the development of the Plan. A description of each of the various components is provided below.

Sustainability Appraisal (SA)

- 1.2.4 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004. It also widens the scope of the assessment from focusing on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans.
- 1.2.5 National Planning Policy Guidance (NPPG) states that the role of SA is *“...to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives”*.
- 1.2.6 Two key procedural requirements of the Regulations are that:
- When deciding on ‘the scope and level of detail of the information’ which must be included in the Environmental Report (in this case, the IIA Report) there is a consultation with nationally designated authorities concerned with environmental issues; and
 - A report (the ‘IIA Report’) is published for consultation alongside the Plan that presents an assessment of the Plan (i.e. discusses ‘likely significant effects’ that would result from plan implementation) and reasonable alternatives.

Equalities Impact Assessment (EqIA)

- 1.2.7 As a public sector organisation, Cotswold District Council has a duty under the Equality Act 2010 and the associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the district eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with protected characteristics and all others. An Equality Impact Assessment

(EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

1.2.8 The Equality Act 2010 legally protects people from discrimination both in the workplace and in wider society. It replaces previous anti-discrimination laws which include the Sex Discrimination Act 1975, Race Relations Act 1976 and the Disability Discrimination Act 1995. The Act ensures that individuals with certain 'protected characteristics' are not indirectly or directly discriminated against. The protected characteristics include:

- **Age:** this refers to persons defined by either a particular age or a range of ages.
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity.
- **Marriage and civil partnership:** marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples.
- **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth.
- **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins.
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief and includes those people who have no formal religion or belief.
- **Gender:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives.
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and / or sexual attraction and the expression of that attraction.
- **Socio-economic status:** a person's socio-economic status referring to combined economic and sociological measure of a person's work experience and economic and social position in relation to others, based on income, education, and occupation.

Health Impact Assessment (HIA)

- 1.2.9 There are numerous links between planning and health highlighted throughout the National Planning Policy Framework (December 2024) (hereafter referred to as ‘the NPPF’). For example, Paragraph 96 of the NPPF states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities and the NPPG states that Local Planning Authorities should ensure that health and wellbeing, and health infrastructure are considered in Local Plans and in planning decision-making.
- 1.2.10 In this context, a Health Impact Assessment (HIA) is a tool used to identify and assess the potential impacts of a plan and inform decision-making.

1.3. IIA process

- 1.3.1 The IIA process to support the Cotswold District Local Plan 2026-2043 is undertaken in five stages. This IIA Report is concerned with **Stage 3**.

Stage 1: Scoping Report

- Establish the context and baseline for the IIA.
- Identify key sustainability issues for the Plan.
- Develop the IIA Framework of objectives and appraisal questions.

Stage 2: Interim IIA Report(s)

- Develop and refine alternatives (i.e., growth ‘scenarios’) for the Plan.
- Appraise the growth scenarios and identify likely significant environmental effects.
- Prepare Interim IIA Report(s) to accompany Regulation 18 consultation(s) on the Plan.

Stage 3: Consult on the Plan and IIA Report

- Appraise the policies and proposals within the draft Plan.
- Prepare the IIA Report to accompany Regulation 19 version of the Plan.
- Consult on the Plan.

Stage 4: IIA Report Addendum

- Submission and examination of the Plan.
- Appraisal of modifications.

Stage 5: IIA Adoption Statement

- Prepare the IIA Adoption Statement.
- Monitor the significant effects of the Plan.

1.4. This IIA Report

1.4.1 The Cotswold District Local Plan 2026-2043 is currently published under Regulation 19 of the Local Planning Regulations, such that representations can be made ahead of the plan being submitted to the Government and subjected to an Examination in Public (EiP) overseen by the Planning Inspectorate.

1.4.2 As such, this is the formally required IIA Report. It is published alongside the Plan in order to inform representations and subsequent plan finalisation as part of the EiP (see discussion of 'next steps' in **Part 3** of this Report).

1.4.3 **Chapter 2** of the IIA Report provides an overview of the Local Plan scope, with **Chapter 3** providing an overview of the IIA scope (Stage 1 of the IIA process). The remaining chapters in this IIA Report have been structured into three parts, as follows:

- **Part 1 (Chapters 4-7)** provides an overview of plan making and IIA to date, and an outline of the reasons for selecting the reasonable alternatives (i.e., the 'growth scenarios') dealt with through the IIA for the Plan. Part 1 also presents the appraisal of these growth scenarios, determining the likely significant environmental effects of the scenarios for each theme that has been scoped into the IIA process.
- **Part 2 (Chapters 8-9)** presents the appraisal findings at this current stage of plan making. Specifically, the appraisal of the Regulation 19 version of the Cotswold District Local Plan 2026-2043, including any recommendations or mitigation measures for consideration by plan makers tasked with finalising the Plan ready for submission; and
- **Part 3 (Chapters 10-11)** sets out the next steps for the IIA process and plan making.

2. The Local Plan scope

2.1. Introduction

- 2.1.1 The aim here is to introduce the context to plan preparation, including the plan area; the plan period; and the objectives that are in place to guide plan preparation.

2.2. The plan area

- 2.2.1 Cotswold District (see **Figure 1-1**) is located in the eastern part of Gloucestershire and covers a predominantly rural area characterised by villages, historic market towns and open countryside. Around 80% of the district lies within the Cotswolds National Landscape, which is a nationally designated landscape of significant environmental and scenic value. This has a strong influence on settlement patterns, landscape character, environmental protection and the capacity for new development.
- 2.2.2 The district shares boundaries with the Gloucestershire authorities of Cheltenham, Gloucester, Forest of Dean, Stroud and Tewkesbury, as well as West Oxfordshire, South Oxfordshire, Cherwell, Stratford on Avon, Wiltshire and Wychavon Districts. These neighbouring areas share several strategic planning matters with Cotswold District, including housing provision, transport connectivity, economic development, environmental assets and the protection of landscape character.
- 2.2.3 Ongoing discussions regarding Local Government Reorganisation in Gloucestershire may have implications for the governance and strategic planning context of the district in the medium to long term. The Ministry of Housing, Communities and Local Government is currently consulting on a number of proposals for unitary local government structures across Gloucestershire, which could result in changes to administrative boundaries, service delivery arrangements and strategic planning responsibilities affecting Cotswold district.
- 2.2.4 Cotswold District currently operates within a three-tier local authority structure. Gloucestershire County Council acts as the strategic authority, with responsibility for services including highways and transport, education, social care and minerals and waste planning. Cotswold District Council functions as the local planning authority, with responsibilities including development management and preparation of the Plan. A network of town and parish councils operates at the local level, representing communities across the district and playing an important role in neighbourhood planning, local service provision and community engagement.
- 2.2.5 The district benefits from its position within the wider regional context of central southern England and maintains strong functional relationships with surrounding urban centres, including Cheltenham and Gloucester to the

west, Oxford to the east and Swindon to the south. These centres provide significant employment opportunities and access to a wide range of retail, education, health and transport services. They play an important role in shaping commuting patterns, economic activity and service use for residents and businesses within Cotswold District.

- 2.2.6 A number of important strategic transport connections support the relationships between the Cotswolds and the surrounding urban centres, with the A40 providing an important east-west route linking Oxford with Cheltenham and Gloucester, the A417 forming a key connection between the M4 and M5 motorways via Cirencester, and the A429 providing a north-south route through the heart of the district. Rail accessibility is provided by the Cotswold Line, serving stations including Moreton-in-Marsh offering direct services to Oxford and London, complemented by the nearby line between Swindon and Gloucester with the station at Kemble in the Cotswold District.

2.3. The plan period

- 2.3.1 The plan period covers a 17-year period from 2026-2043, in light of NPPF paragraph 22 which states:

“Local plans] should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead...”

2.4. Plan objectives

- 2.4.1 It is important to set plan objectives early in order to guide plan-making.
- 2.4.2 Also, the plan objectives are a key input to the IIA process, because of the requirement is to define, appraise and consult on reasonable alternatives taking account of *“the objectives... of the plan.”*
- 2.4.3 The plan includes a spatial vision and set of strategic objectives. The spatial vision is as follows:

By 2043, Cotswold District will be a resilient, inclusive, and forward-looking rural district that has responded to the climate crisis and ecological emergency, conserved and enhanced the Cotswolds National Landscape, delivered sustainable communities, and enabled a vibrant, low-carbon economy. Development will have been guided by a Spatial Strategy that prioritises environmental stewardship, social equity, and economic vitality, while respecting the District’s unique landscape, heritage, and character. The roles of the District’s settlements will be reinforced, with Cirencester

continuing to function as the principal centre, supported by a network of market towns and villages that serve their rural hinterlands.

The Local Plan will have delivered a diverse range of housing, including a significant increase in socially rented and smaller and more affordable homes, enabling residents of all ages and backgrounds to live securely and sustainably. This will include homes that respond to the needs of an ageing population, support younger people and key workers to remain in the District, and provide a mix of sizes and tenures that improve affordability and maintain a balanced community. New development sites will have matured into thriving communities, offering high-quality homes, employment opportunities, and essential services, all supported by integrated infrastructure and sustainable transport networks.

The District will have transitioned to zero-carbon development, with new buildings and infrastructure designed to minimise energy and water use and maximise renewable energy generation. Biodiversity Net Gain will be embedded across all larger development, contributing to a richer natural environment and improved ecological resilience. Water resources will be carefully managed, with development responding to water stress, flood risk and the need to protect and enhance water quality.

The Local Plan will have helped to reduce transport emissions through investment in active travel infrastructure, public transport, and strategic growth focused around transport nodes and ensuring local services and facilities are close enough to access by walking, wheeling or cycling, and/or other sustainable transport modes. Communities will be healthier, more connected, and better supported by local services, green spaces, and digital infrastructure.

Cotswold District will continue to be ‘Green to the Core’, with planning decisions consistently reflecting the long-term interests of people, place, and planet.’

2.4.4 The following strategic objectives will help deliver the spatial vision and guide development through the district over the plan period:

- **SO1: Ensure infrastructure and services support sustainable communities**
 - Help to deliver infrastructure, services, and facilities that meet the needs of residents and businesses.
 - Ensure the required infrastructure and services, as set out in the Infrastructure Delivery Plan, are delivered in a timely manner.
- **SO2: Respond to the climate crisis through adaptation and mitigation**
 - Require new housing development to be zero-carbon and climate-resilient.

- Support the provision of renewable energy schemes and promote community owned renewables initiatives.
- Locate development away from flood-prone areas, treat rainwater as a resource and promote water and energy efficiency.
- **SO3: Conserve and enhance the natural, built, and historic environment**
 - Preserve the high quality, local distinctiveness, and diversity of the natural and historic environment.
 - Support the sympathetic retrofit of historic buildings.
 - Conserve and enhance the distinct character of the Cotswolds National Landscape, open countryside and water quality.
 - Promote high-quality, sustainable design and green infrastructure that supports health and wellbeing and the Local Nature Recovery Strategy.
- **SO4: Deliver inclusive, healthy, and affordable housing**
 - Provide a diverse mix of housing types and tenures to meet the needs of all sections of the community, with a focus on socially rented homes and smaller and more affordable homes.
 - Ensure development supports positive health outcomes and embeds local health and wellbeing strategies.
- **SO5: Enable a vibrant, low-carbon local economy**
 - Support the transition to a low-carbon economy and promote local employment.
 - Encourage the vitality and viability of town and village centres as places that support a range of activities and uses such as shopping, leisure, cultural and community activities; as well as providing access to affordable homes.
 - Promote sustainable tourism.
 - Maintain Cirencester's role as a key employment and service centre.
- **SO6: Promote sustainable transport use and connectivity**
 - Reduce transport emissions by encouraging walking, cycling, wheeling and public transport and supporting the shift to electric vehicles, whilst recognising the rural nature of the area and that private vehicles will remain a necessity for some parts of the District.
 - Focus development at accessible locations where local services and facilities are close enough to access by walking, wheeling or cycling and where there are good public transport links such as access to the Expressbus network.
 - Create multimodal transport hubs to improve access to sustainable transport choices, aid health outcomes and reduce emissions and pollution.

3. The IIA scope

3.1. Introduction

- 3.1.1 The scope of the IIA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan, i.e. when reaching conclusions on ‘likely significant effects’ (see discussion in **Chapter 1**). It does not refer to the scope of the plan (discussed in **Chapter 2**) or the scope of reasonable alternatives (discussed in **Part 1**).
- 3.1.2 The aim here is to introduce the reader to the broad scope of the IIA. It is important for the IIA scope to remain flexible, responding to the emerging plan and reasonable alternatives, and the latest evidence-base.

3.2. Consultation on the scope

- 3.2.1 The SEA Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. These authorities were consulted on the scope of the IIA in late 2020.
- 3.2.2 The responses (along with comments on how these have been considered and addressed through the IIA process) have informed the IIA process and are presented in **Appendix B** of this IIA Report.
- 3.2.3 In the time since scoping consultation was undertaken, it is acknowledged that the planning policy context and baseline has evolved, with this information a useful source of evidence for the IIA. In recognition of this, the planning policy context and baseline information initially included in the Scoping Report has been reviewed and updated (where appropriate) to inform the IIA, and is presented in **Appendix B**.
- 3.2.4 Drawing on the review of the sustainability context and baseline, the IIA Scoping stage identified a range of key sustainability issues that should be a particular focus of IIA (see **Appendix C**), ensuring it remains targeted on the most important issues. These issues were then translated into an IIA ‘Framework’ of objectives and appraisal questions. A short version with just the IIA objectives is provided in **Table 3-1**, while the full version, including supporting questions, is presented in **Appendix C**, reflecting the latest baseline and consultation responses received from the statutory bodies.
- 3.2.5 The IIA Framework provides a way in which the likely significant effects and sustainability implications of the Plan and alternatives can be identified and subsequently analysed based on a structured and consistent approach. The IIA Framework and the appraisal findings in this IIA Report have been

presented under twelve IIA themes, reflecting the range of information being considered through the IIA process.

- 3.2.6 The selected IIA themes incorporate the ‘topics’ suggested by Schedule 2(6) of the Environmental Assessment of Plans and Programmes Regulations. These were refined to reflect a broad understanding of the anticipated scope of plan effects.

Table 3-1: The IIA Framework of topics and objectives

Topic	Objectives
 Biodiversity	• Protect and enhance biodiversity.
 Climate Change (adaptation)	• Ensure adaptability to climate change that, where feasible, goes beyond simple limitation of negative effects.
 Climate Change (mitigation)	• Take an active role in achieving net zero carbon by 2050 if not before.
 Economy and Employment	• Achieve sustainable economic growth and opportunities for employment, including support for the rural economy. Support the resilience and vitality of town centres during transformation from the “traditional” retail-dominated high street to a more flexible and responsive model. • Encourage and support the development of sustainable tourism.
 Equalities	• Advance equality for all.
 Green Infrastructure and Natural Capital	• Conserve and enhance green infrastructure assets and networks and exploit its multi-functional benefits. • Deliver natural capital and enhance the provision of ecosystem services.
 Healthy and Vital Communities	• Contribute to the achievement of balanced and healthy communities and be responsive to the needs of different age groups in the district.

Topic	Objectives
 Historic Environment	• Deliver high quality and well-designed sustainable development that responds appropriately to its context. • Conserve and enhance the historic environment of the district.
 Housing	• Meet local need for housing by maintaining a sustainable level of supply and ensure that new housing is as sustainable as possible in terms of its location, construction materials and internal and external facilities.
 Landscape	• Conserve, restore and enhance the character of landscapes in the district.
 Land, Soil and Water Resources	• Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. • Support the efficient use of land. • Encourage the prudent use of natural resources. • Protect and enhance water quality and minimise water use.
 Transport and Air Quality	• Reduce the need to travel by private car, reduce traffic congestion and air pollution through improving travel choice by active encouragement of modal shift and facilitation of more sustainable forms of transport.

3.3. Integrating equalities and health

3.3.1 The IIA Framework incorporates an 'Equalities' theme and 'Healthy and Vital Communities' theme through which the likely significant effects of the Local Plan and alternatives will be identified. This is with a view to integrating equalities and health impact considerations through the IIA process to discharge the duties for EqIA and HIA.

3.3.2 Further points to note are:

- **EqIA** – the Equality Act 2010 (the Act) introduced a Public Sector Equality Duty, which covers the following protected characteristics: age, disability, gender re-assignment, marriage / civil partnership, pregnancy, maternity, ethnicity, religion/belief, sex and sexual orientation. Under the Duty the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not. EqIA is often used by public sector organisations to demonstrate how this duty has been met. However, there are no procedural requirements specific to EqIA over-and-above those relating to SA (or IIA), hence integrating EqIA simply involves ensuring that the IIA scope has a good focus on equality matters.
- **HIA** – addressing the determinants of good health is increasingly a focus of local plan-making, e.g. a recent study on Integrating Health into Local Plans identified five key themes: Healthy neighbourhood design; Healthy housing; Healthier food environments; Natural and sustainable environments; Healthy transport. HIA is a tool for integrating health-related considerations in local plan-making. As per EqIA, there are no procedural requirements specific to HIA over-and-above those for SA (or IIA), hence integrating HIA simply involves ensuring that the IIA scope has a good focus on health determinants.

Part 1: What has plan making / IIA involved up to this stage?

4. IIA work to date

4.1. Interim IIA Reports

- 4.1.1 Prior to the publication of the revised NPPF in December 2024, CDC had resolved to undertake a partial update of the adopted Local Plan rather than a full review. IIA work to date has been prepared in this context.
- 4.1.2 The first stage of the Partial Local Plan Update was to identify 'Issues and Options'. This was primarily to make the Local Plan 'green to the core' in response to the council's climate change emergency and ecological emergency declarations. Consultation took place between February and March 2022 under Regulation 18 of the Town and Country Planning (England) Regulations 2012. An Interim IIA Report was prepared to accompany the consultation, which appraised a number of alternative policy approaches that could be taken through the Local Plan relating to the following issues: biodiversity; zero-carbon development; carbon storage calculations; accessibility; renewable energy within and outside of the Cotswolds National Landscape; economy and employment second home ownership; and tourism.
- 4.1.3 Between February and March 2023, the Council consulted on two evidence documents to inform the Local Plan making process, specifically: Consultation on Non-Strategic Site Allocations Selection Methodology and Guidance for major development in the Cotswolds National Landscape.
- 4.1.4 In January 2024, as there would soon be less than five years remaining of the adopted Local Plan period, the Council decided to proactively begin the process of planning for development requirements beyond 2031 before a lack of a five-year housing land supply became an issue. The Council therefore approved the commencement of a Development Strategy and Site Allocations Plan (2026-41) which would be undertaken in parallel to the Partial Local Plan Update for strategic reasons.
- 4.1.5 In February to March 2024, the Council undertook consultations on both the 'Draft Policies' of the Partial Local Plan Update and 'Issues and Options' for the Development Strategy and Site Allocations Plan'. An updated Interim IIA Report (Feb 2024) accompanied this stage of plan making, appraising development strategy options to inform the preferred approach and evaluating the relative sustainability merits of promoting development at various broad locations in the vicinity of key settlements (following the points of the compass). The updated Interim IIA Report also assessed the proposed policy revisions.
- 4.1.6 In December 2024, the NPPF and NPPG introduced a new, mandatory 'standard methodology' (the standard method) for calculating the number of homes needed in each local planning authority area. As a result, the Council agreed to combine the Partial Local Plan Update and the

Development Strategy and Site Allocations Plan into a single, and comprehensive, full Plan. Given the plan period for the Plan needs to cover a minimum of 15 years from adoption (expected in 2027), the Local Plan period was extended up to 2043.

- 4.1.7 For Cotswold District, the revised standard method currently identifies a housing need of 1,054 dwellings per annum (dpa), which represents a significant increase of over 100% from the number which the Council was originally planning for (493 dpa) through the initial stages of plan making. This now equates to a total target of 17,918 homes for the new 17-year plan period up to 2043. This updated 1,054 figure is based on the standard methodology calculation provided by the MHCLG's recalculation of housing needs in December 2024.
- 4.1.8 The responses from the previous Regulation 18 consultations remain valid and have been taken into consideration. However, the significant increase to the number of homes for the district required the Council to rethink the proposed development strategy for delivering this scale of growth.
- 4.1.9 In light of the above, a third Interim IIA Report (November 2025) was produced which presented an appraisal of seven growth scenarios for the Plan with a view to identifying the broad spatial strategy for meeting housing needs and employment land requirements during the emerging plan period. This was for the benefit of those who made representations through the Preferred Options (Regulation 18) consultation, undertaken for a period of seven weeks between 14 November 2025 and 2 January 2026.
- 4.1.10 In response to the housing increase for the district, the Regulation 18 consultation was also accompanied by a 'Broad Location Study' which invited site submissions for strategic-scale growth in areas outside of the Cotswolds National Landscape.

4.2. Current stage of plan making

- 4.2.1 The Council have received correspondence from MHCLG confirming that they expect the district to meet their local housing need (LHN) and employment land requirements during the plan period, and plan making has since evolved to reflect this context.
- 4.2.2 In light of this, the growth scenarios tested in the Interim IIA Report accompanying the Preferred Options (Regulation 18) consultation in November 2025 have been revisited and updated to consider reasonable alternative 'growth scenarios' for meeting LHN and employment land requirements across the district at this stage of plan making.
- 4.2.3 This is discussed in **Chapter 5** of this IIA Report.

5. Defining growth scenarios

5.1. Introduction

- 5.1.1 Several formal consultations having been held to date. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** (i.e., the ‘growth scenarios’) ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - as discussed within **Chapter 5** of this IIA Report (i.e., this chapter);
 - present an appraisal of the growth scenarios considered at this stage of plan making - see **Chapter 6** of this IIA Report; and
 - explain the Council’s reasons for selecting the preferred approach - see **Chapter 7** of this IIA Report.
- 5.1.2 Presenting this information aligns with the requirement for the IIA Report to present an appraisal of reasonable alternatives and *“an outline of the reasons for selecting the alternatives dealt with”*.

Reasonable alternatives in relation to what?

- 5.1.3 The legal requirement is to examine reasonable alternative ‘growth scenarios’ taking account of *“the objectives and geographical scope of the plan”*, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF para 69), to meet objectively assessed needs and wider plan objectives. The objective is to allocate a *package* of sites to meet needs and wider objectives, hence reasonable alternatives must be in the form of alternative *packages* of sites, in so far as possible.
- 5.1.4 Establishing a broad spatial strategy is also a central objective, specifically with respect to identifying the preferred approach for distributing housing and employment growth across the district during the plan period. Another consideration is that to be ‘reasonable’, alternatives must be meaningfully different to the extent that they vary in terms of significant effects, where significance is defined in the context of the plan (taken as a whole).

What about other aspects of the plan?

- 5.1.5 As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. Broadly speaking, these can be described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with CDC officers additional to those which

have been considered during the earlier stages of plan making (and accompanying Interim IIA Reports).

5.2. Defining growth scenarios

- 5.2.1 As discussed, the requirement is to appraise and consult upon “*the plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*”. To reiterate, ‘growth scenarios’ equate to reasonable alternatives.
- 5.2.2 In order to provide for objectively assessed needs alongside delivering-on wider plan objectives, the broad spatial strategy for the Cotswold District Local Plan 2026-2043 is to focus major development outside of the Cotswolds National Landscape and at Principal Settlements (more focus) and Non-Principal Settlements (less focus), whilst also supporting opportunities to deliver mixed-use growth across sustainable urban extensions (minimum of 350 homes) or new settlements (minimum of 1,500 homes). The broad spatial strategy was agreed after considering the findings within the Interim IIA Report (see **Scenario 5**) and the responses to the Preferred Options (Regulation 18) consultation in November 2025.
- 5.2.3 In light of the above, the IIA has revisited and updated the growth scenarios considered at the Preferred Options (Regulation 18) consultation to consider the key alternatives that exist at this current stage of plan making. Namely, the consideration of the alternative approaches (i.e., key variable site options) for plan makers tasked with selecting the preferred approach for delivering the broad spatial strategy for the Plan.
- 5.2.4 Ultimately, the aim of **Chapter 5** is to present ‘*an outline of the reasons for selecting the alternatives dealt with*’, in accordance with the Environmental Assessment of Plans and Programmes Regulations.

Top-down (strategic) factors

Housing context

- 5.2.5 For Cotswold District, the revised standard method identifies a housing need of 1,054 dwellings per annum (dpa), which represents an increase of over 100% from the number which the Council was originally planning for (493 dpa) through the initial stages of plan making and Regulation 18 consultations to date. As a result, LHN for the 17-year plan period is 17,918 homes.
- 5.2.6 It is important to be clear that providing for established needs, as far as is consistent with sustainable development, is a key aspect of local plan-making. As part of this, there is a need to plan for LHN provided by the NPPF and then identify a supply of land sufficient to deliver on the committed housing requirement.

- 5.2.7 At the Preferred Options (Regulation 18) Consultation stage of plan making, the growth scenarios tested through the IIA were framed in the context of planning for unmet need in light of the significant constraints to development across the district, as approximately 80% of the district is within the Cotswolds National Landscape. Whilst there is a strategic case for remaining open to unmet need, the findings of the Housing and Economic Land Availability Assessment (HELAA, July 2026) and Site Selection Topic Paper (July 2026) which accompany the evidence base for the Regulation 19 version of the Local Plan demonstrate that there are a number of potential pathways to meeting LHN. For this reason, the basis for the revised growth strategy options considered within this Regulation 19 IIA Report will be the delivery of LHN in the district, with lower growth scenarios ruled out at this stage.
- 5.2.8 Additionally, in accordance with national planning policy and guidance, a potential under-delivery necessitates the application of a buffer to the five-year housing land supply to provide flexibility and resilience in the event of delivery delays or site non-implementation. With the application of a 5% headroom, this would equate to the delivery of in the region of 18,814 homes over the 17-year plan period. Housing trajectory work has been completed to ensure that there is sufficient supply during the first part of the plan period to maintain a five-year housing land supply and in recognition of the fact that the strategic sites have longer lead-in times.

Employment context

- 5.2.9 The Employment Land Review (ELR) 2026 considers the current supply and residual employment needs across the district up to 2043 which need to be met through new allocations (once permissions and completions are taken in to account).
- 5.2.10 Specifically, the ELR outlines a need of 8.3ha for office, research, and development, and 60.2ha for industrial and warehousing development. This results in an overall need of 68.5h during the plan period. In order to meet this requirement, a further 32.7 ha is needed beyond known completions and commitments. Employment land will be delivered for a mix of office, research and development, and industrial uses.
- 5.2.11 The approach to meeting employment land requirements during the plan period focuses on safeguarding and expanding employment provision on existing sites and delivering mixed-use development across strategic site allocations. The integration of employment uses within strategic residential-led developments helps to create more self-contained communities, reduce the need to travel and maximise opportunities for active travel and public transport use.

Settlement role and function

- 5.2.12 In light of the increased LHN for the district, the Council have reconsidered (in broad terms) where is more/less suited to accommodating growth by

revisiting their settlement hierarchy. The refresh of the Council's Settlement Role and Function Study has considered the sustainability of the district's 49 largest settlements delivering growth, and whether the existing hierarchy remains 'fit for purpose'. The Study primarily focuses on the size of settlements, the employment role of settlements, and the community facilities and services they provide.

5.2.13 Principal and Non-Principal Settlements are defined as the most sustainable locations within the district for delivering growth and are the top two tiers within the settlement hierarchy for the Local Plan. Cirencester is classified as the district's 'main settlement' and is the largest town. Moreton-in-Marsh and Kemble are the only locations in the district (both Principal Settlements) with access to a train station. Honeybourne Station is approximately 4km to the west of Mickleton (also a Principal Settlement).

5.2.14 A total of 16 locations are defined as a Principal Settlement:

- Andoversford
- Bourton-on-the-Water
- Cirencester
- Kemble
- Mickleton
- Northleach
- South Cerney
- Tetbury
- Blockley
- Chipping Campden
- Fairford
- Lechlade
- Moreton-in-Marsh
- Siddington
- Stow-on-the-Wold
- Upper Rissington

5.2.15 A total of 18 locations have been defined as Non-Principal Settlements (including Village Clusters):

- Avening
- Bledington
- Broadwell
- Didmarton
- Kempsford
- Meysey Hampton
- Poulton
- Sapperton
- Willersey
- Bibury
- Bourton-on-the-Hill
- Chedworth
- Down Ampney
- Longborough
- North Cerney
- Preston
- Swell
- The village cluster of Coln St Aldwyns, Hatherop, and Quenington

Bottom-up factors

5.2.16 Having discussed 'top down' strategic factors with a bearing on defining growth scenarios, the next step is to give 'bottom up' consideration to detailed area and site-specific factors. In practice, this means discussing

the potential locations for development and what growth typologies are supported (e.g., large 'strategic' sites vs. smaller 'non-strategic' sites).

Site Selection Topic Paper

- 5.2.17 A total of 891 sites have been submitted to the Council as potential land for development, with further assessment required to confirm their suitability and deliverability. All submitted sites have gone through the Council's site assessment and selection process, which applies a series of stages to progressively identify which sites should be rejected and which sites could potentially be recommended for a Local Plan allocation.
- 5.2.18 A comprehensive overview of the stages and the assessment findings can be found within the Site Selection Topic Paper published alongside the Regulation 19 Cotswold District Local Plan 2026-2043. A summary of the process is described below:
- **Stage 1:** Identification and initial assessment of sites through the HELAA. The HELAA provides a 'long-list' of sites which have potential to demonstrate suitability, availability and achievability for more detailed consideration from Stage 2 onwards. A total of 891 sites were assessed at Stage 1 with 328 identified as 'deliverable / developable' or 'potentially deliverable / developable' for further consideration at Stage 2. The HELAA for the emerging Cotswold District Local Plan is published alongside the Regulation 19 Local Plan and should be read in conjunction with this IIA Report and the Site Selection Topic Paper.
 - **Stage 2:** An initial sift of sites which discounts sites based on a set of criteria informed by national policy and guidance (i.e., NPPF and Footnote 7 constraints) and the broad spatial strategy for the emerging Local Plan. The broad spatial strategy is to focus growth at Principal Settlements and Non-Principal Settlements and explore opportunities to deliver strategic growth via sustainable urban extensions or new settlements. The sifting criteria are presented by site category: strategic sites; non-strategic sites; and employment sites. This stage helped to 'filter' the 'long-list' assessed at Stage 1 and created a 'shorter long-list' for further consideration.
 - **Stage 3:** Detailed but proportionate assessment of the constraints and opportunities for the sites taken forward for Stage 3, based on the available technical evidence base. Reflecting the assessment findings, sites are classified into one of three categories with respect to their potential suitability for a Local Plan allocation, as follows:
 - clear preferred site option (++);
 - marginal omission site option (-); or
 - clear omission site option (- -).

- 5.2.19 The detailed assessment findings for the strategic site options, non-strategic site options, and employment site options taken forward to Stage 3 of the process is presented in the Site Selection Topic Paper, with accompanying tables and maps showing the overall ratings and their location within the district. A summary of the findings is presented in **Appendix D** of this IIA Report.

Strategic Growth Opportunities

- 5.2.20 The supply of large numbers of new homes and employment land can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. This is provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).
- 5.2.21 In recognition of the significant constraint to delivering major development within the Cotswolds National Landscape, the Council has considered the potential constraints and opportunities for delivering strategic-scale growth outside of the Cotswolds National Landscape. This could be achieved through sustainable urban extensions to existing settlements (for a minimum of 350 homes), or through the creation of new settlements (for a minimum of 1,500 homes) recognising that developments of this size are generally capable of supporting the infrastructure, services, facilities, employment opportunities and stewardship arrangements necessary to create sustainable communities. These considerations formed part of the initial sift of potential sites within **Stage 2** of the Site Selection Topic Paper.

Opportunities for a potential 'new settlement'

- 5.2.22 Reflecting site availability across the district, there are large areas of land in locations outside of the Cotswolds National Landscape which could accommodate strategic scale growth during the plan period. This primarily includes locations which are within proximity to the main settlement of Cirencester (i.e., the largest settlement in the district). In particular, locations surrounding the villages of Driffield (approximately 4km to the south east) and Ampney Crucis (approximately 2.5km to the east).
- 5.2.23 Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for a potential new settlement, 'Land to the north of Ampney Crucis' (R583A) and 'Land north west of Harnhill, Driffield' (R691), are strategic-scale site options that have indicative capacities which fall short of the 1,500-home threshold for a 'new settlement'. The sites are not adjacent to an existing settlement and therefore cannot be considered as sustainable urban extensions.
- 5.2.24 Reflecting the above, the following sites (or clusters of sites) were taken forward to **Stage 3** of the site selection process for a potential 'new settlement' in the district, outside of the Cotswolds National Landscape and in proximity to Cirencester:

- 'Land to the south of Ampney Crucis'.
- 'Land east of Driffield'.
- 'Land south of Driffield'; and
- 'Land west of Driffield'.

Opportunities for potential 'sustainable urban extensions'

5.2.25 Within the HELAA, of the sites classified as 'potentially deliverable / developable' or 'deliverable / developable' for a sustainable urban extension:

- 'Land to the south west of Fairford (F53A and F53B)' could deliver up to 420 homes reflecting the indicative site capacities within the HELAA. An outline planning application of 74 homes has come forward on Site F53A. Constraints to development across Site F53B limit further opportunities for expansion, given the adjacent SSSI and its associated Impact Risk Zones. On this basis, the sites are considered separately for potential non-strategic development during the plan period.
- 'Land to the north, east and south of Moreton-in-Marsh' is assessed as a potential sustainable urban extension. To the south east of the proposed sustainable urban extension, 'Land at Coldicote Farm' also has an indicative capacity which exceed 350 homes. As the site is not immediately adjacent to the town, development at this location would fall into the 'new settlement' category based on the site selection methodology. However, as the site would adjoin the sustainable urban extension at Moreton-in-Marsh if, in the longer term, 'Land to the north, east, and south of Moreton-in-Marsh' is taken forward as an allocation, it has been tested within the sustainable urban extension category.
- Cotswold Airport currently accommodates around 620 employees, alongside a substantial volume of visitors and customers, with aspirations for further growth. However, the site has since been confirmed as being unavailable for a Local Plan allocation.

5.2.26 Reflecting the above, the following sites (or clusters of sites) were taken forward to **Stage 3** of the site selection process for a potential sustainable urban extension:

- 'Land north of Ampney Crucis'.
- 'Land east of Ampney Crucis'.
- 'Land east of Kingshill Lane, Cirencester'.
- 'Steadings southern extension, Cirencester'.
- 'Land south east of Cirencester and south of Preston'.

- 'The Whiteway, Cirencester'.
- 'Land east of Down Ampney'.
- 'Land south of Down Ampney'.
- 'Land surrounding Down Ampney'.
- 'Land north east of Fairford'.
- 'Land south west of Kemble'.
- 'Cluster of sites to the west of Lechlade'.
- 'Land to the north and west of Mickleton'.
- 'Land to the north, east, and south of Moreton-in-Marsh'.
- 'Land at Coldicote Farm, south of Moreton-in-Marsh'.
- 'Land south west of Siddington'.
- 'Land north of South Cerney Airfield'; and
- 'Cluster of sites to the north of Willersey'.

Arriving at the revised growth scenarios

- 5.2.27 The 'top-down' and 'bottom-up' factors discussed above require the IIA to revisit and refine the growth scenarios which have been considered to date. Sites which were categorised as either a 'clear preferred site option' or 'marginal omission site option' through the Site Selection Topic Paper have informed the revised growth scenarios considered through this Regulation 19 IIA Report.
- 5.2.28 The scenarios have been revised and updated in the context of the Council's objective to meet LHN and employment land requirements over the 17-year plan period between 2026-2043, whilst also aligning with the broad spatial strategy which was established during the earlier stages of plan making. As a reminder, the broad spatial strategy for the Cotswold District Local Plan 2026-2043 is to focus major development outside of the Cotswolds National Landscape and at Principal Settlements (more focus) and Non-Principal Settlements (less focus), whilst also supporting opportunities for strategic growth across sustainable urban extensions (minimum of 350 homes) or new settlements (minimum of 1,500 homes).
- 5.2.29 All scenarios assume that any sustainable urban extensions or new settlements would come forward as mixed-use schemes, comprising primarily residential uses alongside community infrastructure and employment land. The scenarios vary in the scale of growth across variable strategic site options at this stage of plan making, reflecting differing assumptions regarding infrastructure delivery, environmental

constraints, and the relative suitability of each settlement to accommodate development during the plan period.

5.2.30 With respect to the non-strategic sites across the district, the ‘marginal omission’ sites identified through the Site Selection Topic Paper have not been considered through the revised growth scenarios as the focus has been on appraising the key variable strategic site options. This is due to the availability of larger sites (or clusters of sites) outside of the Cotswolds National Landscape and the opportunities afforded by planning for larger scale development in line with national policy and the broad spatial strategy for the emerging Local Plan. Regarding the ‘marginal omission’ sites:

- **Cirencester:** there are clusters of sites within the town centre which could potentially benefit from regeneration, including (listed by their HELAA reference): C52; C57; C70; C97; C101A; C101B; C106B; C149A; and C149B. The sites are mostly areas of brownfield land which provide existing uses, including car parks. Many of the sites are within or within the setting of a conservation area or listed buildings and therefore have sensitive heritage considerations which would need to be addressed through any redevelopment. The Local Plan’s vision for the town centre is to regenerate and improve opportunity sites with a focus on sustainable growth, adaptable development, and active travel, whilst also respecting the town’s unique heritage and character. This is likely to be best achieved via a coordinated approach which applies placemaking principles to achieve this vision.
- **Kemble:** whilst an allocation at K6A would support the regeneration of previously developed land, the site is within a Special Landscape Area.
- **Moreton-in-Marsh:** M22 is unlikely to contribute to housing supply in the first few years of the plan period, and M78 is considered for potential employment uses. Both sites also have landscape and flood risk sensitivities.
- **Siddington:** whilst SD6 and SD8 are relatively unconstrained, their location outside of the settlement boundary limits their overall suitability. SD21 is relatively contained within the settlement, but the heritage sensitivities also limit the overall suitability relative to the ‘clear preferred’ site options for the settlement.
- **Tetbury:** whilst T70 is within the Cotswolds National Landscape, the site has received permission in principle and a live application for up to eight homes on the site is pending (ref: 25/02572/FUL).
- **Preston:** whilst R281 adjoins the existing village (to the north east), the site has a limited relationship with the village core. The site is also located between two strategic site options to the north and to the south.
- **Quenington:** whilst R538 adjoins the Cotswolds National Landscape, the site has a low-medium sensitivity and aligns with the existing

settlement pattern. However, the capacity of the site limits its potential contribution to housing supply in a Non-Principal Settlement which is also a less-focus area for growth during the plan period.

5.2.31 All scenarios incorporate a consistent set of constants in relation to the distribution of growth across the district. These elements form the baseline position across all of the revised growth scenarios and comprise:

- **Known commitments:** reflecting the commitments up to 1st April 2026.
- **Saved allocations:** those which are rolled forward from the adopted Local Plan but have not yet been built-out (or partially built-out).
- **Windfalls:** no windfall figure for the first three years of the plan period, with the total calculated based on a 14-year period with a conservative estimate of the total applied.
- **Constant strategic allocations:** incorporating seven sustainable urban extensions adjoining Principal and Non-Principal Settlements, and one new settlement to the south of Driffield. All of the sites are identified as 'clear preferred' site options within the Site Selection Topic Paper. The sites have been comprehensively master planned with accompanying site development frameworks included in the Local Plan, reflecting engagement with site promoters, key stakeholders, and consideration of Regulation 18 consultation responses. An overview of the key elements of the strategic allocations is provided below.
 - **Cirencester - land to the south of the Steadings:** an extension to a 'saved allocation' from the adopted Local Plan, this site will deliver an additional 585 homes during the plan period at a location which adjoins the district's main settlement. The scheme will provide a new primary school and local centre, green infrastructure, and active travel links to Cirencester town centre. Additionally, the scheme will deliver highway upgrades the Kingshill Road/ London Road junction and Kingshill Road/ Cirencester Road junction. The site has the potential to deliver a further 815 homes beyond the plan period.
 - **Cirencester - land to the east of Kingshill Lane:** delivering 613 homes in a location which adjoins the district's main settlement, including a primary school, local centre providing day-to-day services, extensive green infrastructure corridors and open spaces, and active travel connections linking to Cirencester town centre. The scheme will also deliver highway upgrades to the A419 Stroud Road/ Trewsbury Road junction.
 - **Down Ampney - land to the north, east, and south of Down Ampney:** delivering 1,658 homes (a scale consistent with a new settlement) adjoining a settlement which is located on the A419 route south of Cirencester, with good access to the town. Down Ampney is also well connected to the wider route between Cheltenham and Swindon, that will see a major boost in 2027 with the A417 gap to the east of Cheltenham set to be completed.

- **Driffield - new settlement to the south of Driffield:** delivering 1,090 homes and approximately 10.9ha of new employment land during the plan period with the potential to deliver an additional 1,132 homes beyond the plan period. There are opportunities for effective cycling, walking and wheeling connections to Cirencester and with improved public transport. The new settlement will be located close to the Army Barracks at South Cerney that has recently been awarded significant investment. This will help to reduce the reported, relative isolation of the existing Army site, that will also benefit from the improved local facilities and connectivity.
- **Kemble - land to the south west of Kemble:** delivering 1,019 homes and approximately 8.6ha of new employment land in one of only two locations in the district which connects to the national rail network. Growth will be delivered in proximity to an established employment site at Cotswold Airport, which currently accommodates around 620 employees alongside visitors and customers, with aspirations for further growth.
- **Preston - land to the south of Preston:** delivering 1,368 homes within proximity to Cirencester. The design of the scheme will incorporate buffers between new and existing development to maintain settlement identity and distinctiveness. A new secondary school will be delivered as part of the scheme that will meet the needs of the new development in the area, complement that already provided in the town, but avoid negatively impacting existing schools.
- **Siddington - land to the south-west of Siddington:** delivering 372 homes within proximity to Cirencester, alongside a local centre for day-to-day services, extensive green infrastructure corridors and open spaces, and active travel connections linking to Cirencester town centre. The design of the scheme will incorporate buffers between new and existing development to maintain settlement identity and distinctiveness, and upgrade the intersection between Somerford Road and Chesterton Lane,
- **Fairford - land to the north east of Fairford:** delivering 1,141 homes, approximately 4.2ha of new employment land, and a new through road that will help to reduce traffic impacts in the settlement centre and provide a range of new services and facilities, including a primary school and infrastructure for retail. The through road will form a primary vehicle route linking the site parcels between Leafield Road and London Road (A417), relieving congestion and providing a direct route for east-west movements.
- **Non-strategic allocations:** incorporating sites within or adjoining Principal and Non-Principal Settlements across the district. In light of the LHN for the district and given that a significant supply of new homes will be brought forward via strategic sites which have longer lead-in times, all of the 'clear preferred site options' for non-strategic growth are proposed as Local Plan allocations and have therefore been applied as constants across the revised scenarios. Alongside the application of a 5% headroom and a stepped trajectory, this will ensure

confidence that housing supply can be met during the first few years of the plan period.

5.2.32 The variable strategic site options across the scenarios focus on the key choices which exist at this stage of plan making at three locations. The numbers have been informed by the Council's wider technical evidence base which is published alongside the Regulation 19 version of the Cotswold Local Plan 2026-2043.

- **Moreton-in-Marsh:** There are clusters of sites to the north, east, and south of the town which could deliver a sustainable urban extension during the plan period. A minimum of 3,500 homes would be required to deliver a full link road accompanying an extension to the northern, eastern and southern areas of the town. A minimum of 1,967 homes could deliver a partial link road accompanying an extension to the eastern and southern areas of the town, and up to 2,200 homes without incorporating any new areas of employment land. A maximum of 1,500 homes could be delivered as an urban extension to the northern, eastern and southern areas of the town without the requirement for strategic transport interventions (i.e., without a link road).
- **Mickleton:** A total of 1,238 homes could be delivered as a sustainable urban extension to the north and to the west of the village. A total of 731 homes could be delivered to the north of the village in recognition of the potentially significant landscape constraints to the west, which is within the setting of the Cotswolds National Landscape and a Special Landscape Area.
- **Ampney Crucis:** Whilst the village is not classified as either a Principal or Non-Principal Settlement, the village is surrounded by several sites to the north which could accommodate strategic-scale growth within proximity to Cirencester (i.e., the largest settlement in the district) and outside of the Cotswolds National Landscape (which covers approximately 80% of the district). A total of 516 homes could be delivered across three sites adjoining the north of the village, representing the full extent of development that could reasonably be delivered over the plan period. A lower figure of 350 homes is considered a more conservative estimate due to the on-site constraints and the viability of securing appropriate access and mitigation. The lower figure aligns with the Council's minimum requirement for a sustainable urban extension in the district.

5.2.33 In the context of the above, seven growth scenarios have been assessed through the IIA to inform the Council's preferred approach at this stage of plan making. Specifically, the scale of growth at key variable strategic site options (at Moreton-In-Marsh, Mickleton, and Ampney Crucis) to meet LHN and employment requirements and to deliver the broad spatial strategy.

5.2.34 It is acknowledged that theoretically there are several potential combinations which could be applied to the scenarios. The combinations which have been tested seek to avoid an under-delivery or over-delivery of homes, i.e., from applying lower growth or higher growth across all of the variable site options, whilst also reflecting the key choices for plan makers tasked with selecting the preferred approach for the Local Plan at this Regulation 19 stage of plan making. The scenarios are as follows:

- **Scenario 1:** Higher growth at Moreton-in-Marsh; higher growth at Mickleton; no growth at Ampney Crucis. The total housing supply through Scenario 1 is 20,112 homes, providing an approximate 12.2% headroom above LHN.
- **Scenario 2:** Medium-high growth at Moreton-in-Marsh; higher growth at Mickleton; no growth at Ampney Crucis. The total housing supply through Scenario 2 is 18,812 homes, providing an approximate 5.0% headroom above LHN.
- **Scenario 3:** Medium growth at Moreton-in-Marsh; higher growth at Mickleton; higher growth at Ampney Crucis. The total housing supply through Scenario 3 is 19,095 homes, providing an approximate 6.6% headroom above LHN.
- **Scenario 4:** Medium growth at Moreton-in-Marsh; higher growth at Mickleton; lower growth at Ampney Crucis. The total housing supply through Scenario 4 is 18,929 homes, providing an approximate 5.6% headroom above LHN.
- **Scenario 5:** Medium growth at Moreton-in-Marsh; lower growth at Mickleton; higher growth at Ampney Crucis. The total housing supply through Scenario 5 is 18,588 homes, providing an approximate 3.7% headroom above LHN.
- **Scenario 6:** Medium growth at Moreton-in-Marsh; lower growth at Mickleton; lower growth at Ampney Crucis. The total housing supply through Scenario 6 is 18,422 homes, providing an approximate 2.8% headroom above LHN; and
- **Scenario 7:** Lower growth at Moreton-in-Marsh; higher growth at Mickleton; lower growth at Ampney Crucis. The total housing supply through Scenario 7 is 18,462 homes, providing an approximate 3.0% headroom above LHN.

5.2.35 The housing supply for the component parts and variables for each growth scenario is presented in **Table 5-1** overleaf. These are correct as of July 2026, although it is recognised that the numbers for the 'known commitments' and 'non-strategic allocations' may be revised over the coming months given that there are site options with live planning applications. Updated housing completions for the 2026 to 2027 year may be available around May 2027, to inform the Plan before adoption.

Table 5-1 : The reasonable alternative growth scenarios

Supply component	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Constants							
Known Commitments	1,406	1,406	1,406	1,406	1,406	1,406	1,406
Saved Allocations	2,282	2,282	2,282	2,282	2,282	2,282	2,282
Windfalls	2,289	2,289	2,289	2,289	2,289	2,289	2,289
Strategic Allocations (total)	7,846	7,846	7,846	7,846	7,846	7,846	7,846
<i>Cirencester - land to the south of the Steadings</i>	585	585	585	585	585	585	585
<i>Cirencester - land to the east of Kingshill Lane</i>	613	613	613	613	613	613	613
<i>Down Ampney - land to the north, east, and south of Down Ampney</i>	1,658	1,658	1,658	1,658	1,658	1,658	1,658
<i>Driffield - new settlement to the south of Driffield</i>	1,090	1,090	1,090	1,090	1,090	1,090	1,090
<i>Kemble - land to the south west of Kemble</i>	1,019	1,019	1,019	1,019	1,019	1,019	1,019
<i>Preston - land to the south of Preston</i>	1,368	1,368	1,368	1,368	1,368	1,368	1,368
<i>Siddington - land to the south-west of Siddington</i>	372	372	372	372	372	372	372
<i>Fairford - land to the north east of Fairford</i>	1,141	1,141	1,141	1,141	1,141	1,141	1,141
Non-Strategic Allocations	1,551	1,551	1,551	1,551	1,551	1,551	1,551

Supply component	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Variables							
Strategic Allocations (total)	4,738	3,438	3,721	3,555	3,214	3,048	3,088
Ampney Crucis - sites R583B, R583C, and R583D			516	350	516	350	350
Mickleton - land to the north and west of Mickleton	1,238	1,238	1,238	1,238	731	731	1,238
Moreton-in-Marsh - land to the north, south and east of Moreton-in-Marsh (Full Link Road)	3,500						
Moreton-in-Marsh - land to the south and east of Moreton-in-Marsh (SE Link Road)		2,200	1,967	1,967	1,967	1,967	
Moreton-in-Marsh - land to the north, south and east of Moreton-in-Marsh (No Link Road)							1,500
TOTALS (to 2043)	20,112	18,812	19,095	18,929	18,588	18,422	18,462
LHN	17,918	17,918	17,918	17,918	17,918	17,918	17,918
LHN (+5%)	18,814	18,814	18,814	18,814	18,814	18,814	18,814
Headroom (above LHN)	2,194	894	1,177	1,011	670	504	544
% above LHN	12.2%	5.0%	6.6%	5.6%	3.7%	2.8%	3.0%

6. Appraising growth scenarios

6.1. Introduction

- 6.1.1 The growth scenarios presented in **Chapter 5** have been appraised. For each scenario, the appraisal identifies / evaluates 'likely significant effects' on the baseline, drawing on the IIA themes / objectives identified through scoping as a methodological Framework (see **Appendix C**).

6.2. Appraisal methodology

- 6.2.1 For each IIA theme, a commentary on the likely effects is presented, including significant effects. These range from major positive (++) / minor positive (+) to major negative (--) / minor negative (-) (see **Table 6-1**). Where both positive and negative effects are anticipated, mixed effects (+/-) are noted. Where no significant effects are anticipated neutral / no effects (0) are noted. Finally, where it is not possible to conclude on significance at this stage, uncertain effects (?) are noted. Scenarios are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '6' the least favourable ranking.

Table 6-1: Significance key

Major negative --	Minor negative -	Minor positive +	Major positive ++	Mixed effects +/-	Neutral effect 0
(significant adverse effect)	(adverse effect of limited or uncertain significance)	(beneficial effect of limited or uncertain significance)	(significant beneficial effect)	(a combination of beneficial and adverse effects)	

- 6.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the scenarios under consideration. In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the appraisal text.
- 6.2.3 Where it is not possible to predict likely significant effects on the basis of 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. 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'.

6.2.4 Finally, it is important to note that effects are predicted taking into account the criteria presented within the Environmental Assessment of Plans and Programme Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects.

6.2.5 The appraisal findings are discussed below. The following information is presented:

- A detailed overview of the relative sustainability merits of each scenario, presented as a commentary of effects for each IIA theme;
- A summary of the appraisal findings (see **Table 6-2**), including the ranking of each scenario and identifying the likely significant environmental effects relating to each IIA theme; and
- Conclusions and recommendations at this stage of plan making.

Biodiversity

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	6	4	5	3	2	1	7
Significance	+/-	+/-	+/-	+/-	+/-	+/-	--

Appraisal

6.2.6 Effects on biodiversity are closely linked to the scale and location of growth proposed under each scenario, particularly in relation to proximity to the Cotswolds National Landscape, designated sites, and areas of relatively unconstrained land. The assessment therefore focuses on the extent to which development may result in habitat loss, fragmentation and disturbance, alongside opportunities for mitigation and enhancement through masterplanning and the provision of green infrastructure.

6.2.7 The key variables relate to the scale of growth proposed at Moreton-in-Marsh, Mickleton and Ampney Crucis, and the extent to which development is directed towards more or less sensitive locations.

6.2.8 At Moreton-in-Marsh, **Scenario 1** proposes the highest level of growth, extending the settlement to the north, east and south, and therefore resulting in the greatest extent of greenfield land take and associated habitat loss. While these areas are not subject to statutory ecological designations, they contain features of local importance. The eastern development area includes parcels of deciduous woodland, and the southern development area lies adjacent to areas of grassland and deciduous woodland, both of which may be sensitive to development. To the north, development would include and be adjacent to a more continuous belt of deciduous woodland running parallel to Todenham Road. The delivery of the northern parcel in combination with the link road and

development to the east and south has the potential to fragment this woodland feature, resulting in more pronounced effects in terms of habitat connectivity. However, the comprehensive nature of **Scenario 1**, including the delivery of a full link road, also presents greater opportunities for coordinated green infrastructure provision and biodiversity enhancement. **Scenarios 2 to 6** reduce the scale of growth and limit development to the south and east, thereby likely avoiding fragmentation of the northern woodland corridor along Todenham Road and resulting in a more contained pattern of land take. These scenarios also deliver a south-east link road, which provides opportunities for coordinated green infrastructure provision. **Scenario 7** further reduces growth overall, limiting direct impacts, although the absence of a link road may constrain opportunities to deliver coordinated mitigation and enhancement measures.

- 6.2.9 At Mickleton, the distinction between scenarios is primarily related to the overall extent of greenfield land loss. **Scenarios 1, 2, 3, 4 and 7** include growth to both the north and west of the settlement, resulting in a greater quantum of land take and associated habitat loss. While the majority of the land is not subject to ecological designations, the western parcel includes a small area of deciduous woodland identified as a priority habitat, which may be more sensitive to development. **Scenarios 5 and 6** focus growth to the north of the village, thereby reducing the overall extent of land taken and likely avoiding the loss of habitat in the west of the development area.
- 6.2.10 At Ampney Crucis, the distinction between scenarios relates to the intensity of development rather than the overall extent of land take, as the same parcels of land are assumed to be brought forward across all scenarios. As such, differences in effects are primarily related to the density and form of development rather than the overall site area affected. It is also worth noting that there are no designated habitats within the development areas. However, an area of deciduous woodland priority habitat is located to the north of the site and could be indirectly affected by development, particularly during construction. Scenarios incorporating higher growth (**Scenarios 3 and 5**) would result in increased development density, which may lead to greater disturbance and reduced opportunities to retain and enhance green infrastructure within the site. In contrast, **Scenarios 4, 6, and 7**, which assume a lower quantum of development, may allow greater flexibility in site layout, including the potential to provide a green infrastructure buffer along the northern boundary to help protect the woodland and support ecological connectivity. **Scenarios 1 and 2** avoid these effects entirely by not including growth at this location.

Conclusion

- 6.2.11 **Scenario 6** performs most favourably, as it reduces development in more sensitive locations while avoiding the northern parcel at Moreton-in-Marsh, thereby limiting habitat loss and avoiding fragmentation of the woodland corridor. **Scenario 5** also performs relatively well, reflecting reduced

growth at Mickleton and greater flexibility to avoid locally sensitive habitat features. **Scenario 4** performs moderately, whilst **Scenario 2** performs slightly more favourably than **Scenario 3** as it similarly avoids the northern parcel at Moreton-in-Marsh but does not include growth at Ampney Crucis, thereby avoiding potential indirect effects on the nearby priority woodland habitat. All of these scenarios also benefit from green infrastructure provision tied to the delivery of a link road.

6.2.12 **Scenario 1** performs relatively poorly due to the higher overall level of development, and the potential concentration of impacts within proximity to sensitive ecological receptors, especially in the northern parcel of Moreton-in-Marsh. Whilst the scenario benefits from avoiding development at Ampney Crucis and the associated potential indirect effects on the priority woodland habitat to the north of the village, this benefit is outweighed by the greater scale and extent of development proposed at Moreton-in-Marsh and Mickleton.

6.2.13 **Scenario 7** performs least favourably, as it retains higher levels of development at Mickleton and has the least potential for strategic infrastructure delivery, resulting in a more fragmented approach to mitigation and greater overall impacts.

Climate change adaptation

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	6	3	5	4	2	1	7
Significance	+/-	+/-	+/-	+/-	+	+	--

Appraisal

6.2.14 Effects on climate change adaptation are influenced by the location, scale and form of development, including flood risk, the capacity to incorporate sustainable drainage systems (SuDS), and the provision of green and blue infrastructure to manage heat and water. The assessment therefore considers the extent to which each scenario supports resilience to climate-related risks, including fluvial flooding, surface water flooding and overheating, with a focus on the key variable site options.

6.2.15 At Moreton-in-Marsh, all scenarios direct development to areas which are largely located outside Flood Zones 2 and 3. The exception is the southern development area, which includes areas of Flood Zones 2 and 3 and is present across all scenarios. Some areas of surface water flood risk are also present, primarily within the eastern development area, although these are common to all scenarios and therefore do not materially influence the comparative assessment. As such, there is limited variation between scenarios in terms of fluvial and surface water flood risk exposure. The main point of distinction, therefore, relates to the scale of development and

the delivery of infrastructure. **Scenario 1**, with the highest level of growth, provides the greatest opportunity to deliver coordinated drainage strategies and strategic green infrastructure, which can support water management and urban cooling. However, this also increases the extent of impermeable surfaces, runoff and exposure to climate-related risks, meaning these benefits are balanced by increased pressure. The larger scale of development may also result in greater cumulative flood risk management pressures, whilst the proposed road connection across the River Evenlode corridor introduces an additional climate resilience consideration (which is also relevant to **Scenarios 2 to 6**). **Scenarios 2 to 6** also provide opportunities for coordinated drainage strategies, strategic green infrastructure and flood risk management measures, although the reduced scale of development may limit opportunities for more comprehensive solutions. **Scenario 7** performs less favourably in this respect, as the absence of a link road and associated infrastructure reduces the opportunity for integrated, strategic approaches to climate resilience.

- 6.2.16 At Mickleton, the western development area is bordered by Norton Brook and therefore contains areas of Flood Zone 3. While development may be designed to avoid the functional floodplain, proximity to this area introduces a greater degree of flood risk and may constrain layout and reduce flexibility for adaptation measures. Higher growth scenarios (**Scenarios 1, 2, 3, 4 and 7**) therefore present a higher risk of development closer to the higher risk areas. Additionally, across all scenarios, higher levels of development increase the importance of effective SuDS and green infrastructure to manage runoff and reduce localised flood risk. Lower growth scenarios (**Scenarios 5 and 6**) provide greater flexibility to avoid the most sensitive areas and incorporate appropriate buffers, while higher growth scenarios are more likely to reduce this flexibility and increase pressure on drainage systems.
- 6.2.17 At Ampney Crucis, there is no variation in the spatial extent of development between scenarios, as the same parcels are assumed to come forward regardless of growth level. Flood maps also show that fluvial flood risk is low across the area, while there are some small areas of high surface water flood risk. As such, exposure to flood risk is consistent across all scenarios. Differences instead relate to development intensity, with higher density scenarios (**Scenarios 3 and 5**) potentially limiting the space available for green infrastructure and on-site drainage features, while lower density scenarios (**Scenarios 4, 6, and 7**) may allow greater flexibility for integrating adaptation measures. This also influences the ability to manage surface water runoff and provide cooling through landscaping, with lower intensity development generally offering better adaptation potential. **Scenarios 1 and 2** avoid these effects entirely at this location.
- 6.2.18 In addition to flood risk, all scenarios will contribute to localised heating effects associated with new development. Larger-scale and higher-density development is likely to increase the risk of urban heat island effects,

particularly where green infrastructure is limited. As such, higher growth scenarios are more likely to increase heat-related risks, while lower growth scenarios provide greater opportunity to incorporate mitigating features such as tree planting, shading and open space, although this is dependent on the type of development which is brought forward. Scenarios that incorporate comprehensive masterplanning and allow sufficient space for tree planting, open space and water features are also likely to perform more favourably in mitigating these effects. It is anticipated that all strategic site allocations will be accompanied by detailed design briefs in this respect.

Conclusion

- 6.2.19 **Scenario 6** performs most favourably, as it limits development in more sensitive locations while retaining the ability to deliver coordinated SuDS and green infrastructure at Moreton-in-Marsh. **Scenario 5** also performs relatively well, reflecting reduced growth at Mickleton and greater flexibility to avoid higher-risk areas.
- 6.2.20 **Scenario 2** performs moderately and more favourably than **Scenarios 3 and 4**, as it retains opportunities for coordinated adaptation measures and strategic green infrastructure at Moreton-in-Marsh whilst avoiding development at Ampney Crucis altogether. The concentration of a slightly greater proportion of development at Moreton-in-Marsh also helps support the delivery of strategic infrastructure and comprehensive masterplanning. **Scenario 4** performs slightly less favourably than **Scenario 2** due to the inclusion of growth at Ampney Crucis, although the lower development quantum allows greater flexibility for integrating adaptation measures. **Scenario 3** performs less favourably still due to the higher level of growth proposed at Ampney Crucis.
- 6.2.21 **Scenario 1** is less favourable due to high growth at Mickleton and the overall scale of development at Moreton-in-Marsh, increasing exposure to climate risks despite opportunities for coordinated mitigation.
- 6.2.22 **Scenario 7** performs least favourably, as is less likely to deliver the same level of strategic infrastructure as the other scenarios, particularly at Moreton-in-Marsh, which results in a more fragmented approach to adaptation measures. While the spatial distribution of development is similar to other scenarios, fewer opportunities to deliver coordinated infrastructure reduces the effectiveness of green infrastructure and SuDS at a strategic scale, leading to poorer overall outcomes.

Climate change mitigation

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	1	2	6	4	5	3	7
Significance	+/-	+/-	+/-	+/-	+/-	+/-	--

Appraisal

- 6.2.23 Effects on climate change mitigation are influenced by the location and scale of development, particularly in relation to access to jobs, services and sustainable transport. The assessment also considers the role of green infrastructure in supporting carbon sequestration and reducing emissions. The key issue is whether development is directed to locations that reduce reliance on private vehicles and support more sustainable patterns of travel.
- 6.2.24 At Moreton-in-Marsh, the settlement benefits from relatively good connectivity, including a railway station and access to a range of services and facilities. Directing growth to this location is likely to support more sustainable travel patterns and reduce reliance on private vehicles. **Scenario 1** performs most favourably, as it directs the highest level of growth to the most sustainable location. This makes efficient use of existing infrastructure and supports lower transport-related emissions. However, the increased scale of development would also result in higher overall emissions, particularly during construction and build-out phases. **Scenarios 2 to 6** also perform positively, although to a lesser extent due to the reduced scale of development. **Scenario 7** performs least well, as it includes the lowest level of growth at Moreton-in-Marsh and therefore makes limited use of this accessible location.
- 6.2.25 At Mickleton, all scenarios are likely to result in a relatively high level of car dependency. The settlement has limited services, and while Honeybourne railway station is relatively close (approximately 4 km), most journeys are likely to require access by car. **Scenarios 1, 2, 3, 4 and 7** include the highest level of growth and would therefore result in higher transport-related emissions. However, given Mickleton's relative accessibility in the context of the district, including its proximity to a railway station, these effects may be moderated to some extent. **Scenarios 5 and 6**, which reduce the scale of development, are likely to result in comparatively lower emissions.
- 6.2.26 At Ampney Crucis, the settlement is located close to Cirencester (approximately 3 km), which provides access to a wider range of services and employment opportunities. This may support shorter journeys, and additional growth within proximity to one of the most sustainable locations within the district. However, public transport accessibility is more limited

compared to Moreton-in-Marsh, and reliance on private vehicles is still likely. **Scenarios 3 and 5** include higher levels of growth at Ampney Crucis and would therefore result in higher overall emissions. **Scenarios 4, 6, and 7** reduce the level of development and are likely to result in comparatively lower impacts. **Scenarios 1 and 2** avoid development at this location, thereby avoiding associated emissions altogether.

- 6.2.27 Green infrastructure plays an important role in supporting climate change mitigation by contributing to carbon sequestration and promoting active travel. All scenarios would be expected to deliver a proportion of green infrastructure in line with national and local policy requirements. However, the extent and effectiveness of provision is influenced not only by the total quantum of development, but also by factors such as site layout, dwelling mix, design approach and the degree to which green infrastructure can be integrated with existing networks. **Scenarios 2 to 6** are assumed to deliver a similar level of development at Moreton-in-Marsh and would therefore provide broadly comparable opportunities for green infrastructure provision at this location. Differences between these scenarios instead relate to the distribution of growth at Mickleton and Ampney Crucis, which may influence the extent to which wider, connected green infrastructure networks can be achieved. Scenarios involving higher levels of development at a single location (particularly **Scenario 1**) may place greater pressure on land availability within sites, potentially limiting opportunities for more extensive or strategic green infrastructure provision. **Scenario 7**, while involving a lower quantum of development at Moreton-in-Marsh, is still assumed to come forward as a comprehensively master planned scheme and could therefore incorporate a significant level of green infrastructure. However, its reduced scale may limit opportunities to deliver coordinated green infrastructure compared to higher growth scenarios.
- 6.2.28 Finally, all scenarios provide opportunities to deliver energy-efficient development and low-carbon infrastructure. However, as these measures are assumed to apply consistently across all scenarios, they do not materially influence the comparative assessment. Although it is worth noting that higher levels of growth would result in a greater absolute number of homes being delivered to modern environmental and energy efficiency standards.

Conclusion

- 6.2.29 Overall, most scenarios are expected to result in mixed effects, reflecting a balance between increased emissions and opportunities to reduce them through location, design and the provision of supporting infrastructure.
- 6.2.30 **Scenario 1** performs most favourably overall, as it directs the highest level of growth to Moreton-in-Marsh, the most accessible settlement in the district, with a railway station and a wider range of services and facilities. This maximises opportunities for sustainable travel and mitigation, although higher total emissions would still arise from the overall scale of

development. **Scenario 2** also performs strongly, directing the second highest proportion of growth to Moreton-in-Marsh whilst avoiding development at Ampney Crucis, maximising opportunities for sustainable travel and the delivery of strategic low-carbon infrastructure in one of the district's most accessible locations.

- 6.2.31 **Scenario 6** also performs strongly, combining a focus on Moreton-in-Marsh with a lower overall quantum of development, helping to limit total emissions while still supporting relatively sustainable travel patterns and opportunities for coordinated green infrastructure provision.
- 6.2.32 **Scenarios 4, 5 and 3** perform moderately. While they include elements of growth at sustainable locations, they also introduce a more dispersed pattern of development across Mickleton and/or Ampney Crucis, increasing reliance on private vehicles. These effects are moderated to some extent by Mickleton's proximity to Honeybourne railway station.
- 6.2.33 **Scenario 7** performs least favourably. While the overall level of growth is lower, development is distributed across all three settlements, limiting the ability to maximise growth at one of the most accessible locations in the district and reducing the effectiveness of mitigation measures.

Economy and employment

€ \$ £ ¥	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	1	2	3	5	4	6	7
Significance	++	++	++	++	++	++	+/-

Appraisal

- 6.2.34 Effects on the economy and employment are influenced by the scale and distribution of growth, particularly in relation to access to jobs, services and infrastructure. The assessment considers both the overall level of economic activity generated and whether growth is directed to locations that are well related to existing employment centres. Scenarios that deliver higher levels of development, particularly in accessible locations, are likely to generate stronger economic effects overall. All scenarios include strategic sites which, although primarily residential led, would be expected to come forward as mixed-use developments incorporating a proportion of employment land, thereby contributing to local job creation and economic activity. In this respect, employment land requirements are expected to be met through all scenarios.
- 6.2.35 At Moreton-in-Marsh, the settlement has an established role as a service centre, with a range of facilities, employment opportunities and a railway station, and is well placed to support additional growth, including access to wider employment opportunities. Directing development to this location is

likely to support the local economy, reinforce town centre vitality and provide opportunities for new employment provision. Larger-scale and more coordinated development would also create opportunities for strategic infrastructure investment, supporting job creation, improved services and increased activity within the town centre through developer contributions. However, the settlement has experienced significant recent growth, which may place pressure on infrastructure and services and could reduce the extent to which further development delivers additional economic benefits.

Scenario 1 performs most favourably, as it delivers the highest level of growth and makes the most effective use of this accessible location.

Scenarios 2 to 6 also perform well, although the economic benefits are more moderate, while **Scenario 7** performs least favourably as it limits growth at this key settlement and reduces its contribution to economic activity.

- 6.2.36 While Mickleton is classified as a Principal Settlement in district, the settlement has a limited economic role when compared with larger centres such as Cirencester and Moreton-in-Marsh. However, it benefits from reasonable access to employment opportunities both within and outside the district, including Chipping Campden (which functions as an important service and visitor destination) and the employment areas at Meon Vale to the north. The settlement also lies in proximity to Honeybourne railway station, providing access to wider employment opportunities. Higher growth scenarios (**Scenarios 1, 2, 3, 4 and 7**) would increase the population and support local services, whilst also providing labour supply to nearby employment centres. Nevertheless, the settlement remains relatively dependent on travel to access a wider range of jobs and services, meaning higher levels of development are likely to reinforce the existing patterns of out-commuting. **Scenarios 5 and 6**, which reduce growth, are more consistent with the existing role and function of the settlement and perform more favourably in this respect.
- 6.2.37 At Ampney Crucis, while the settlement falls within the lowest tier in the district's settlement hierarchy ('open countryside'), it benefits from reasonable access to Cirencester, which acts as a key employment and service centre. As with Mickleton, the scale of growth proposed would be relatively substantial in the context of the settlement. However, its proximity to Cirencester means that development is likely to support the district's wider economy by providing labour supply and supporting nearby services. The same development area is assumed across all scenarios, meaning differences relate to the scale of growth. Higher growth scenarios (**Scenarios 3 and 5**) would generate stronger economic benefits by reinforcing links with Cirencester's labour market and service base. **Scenarios 4, 6, and 7**, which assume a lower level of growth, would result in more limited economic effects. **Scenarios 1 and 2** do not include growth at this location and therefore do not contribute to this relationship.

Conclusion

- 6.2.38 The assessment identifies that all scenarios are likely to have positive effects on the economy and employment, reflecting the assumption that strategic sites will deliver mixed-use development incorporating employment provision, supporting job creation and economic activity across the district. Across all scenarios, strategic allocations are assumed to deliver mixed-use development, including employment land and community infrastructure. Scenarios that concentrate growth at Moreton-in-Marsh and make efficient use of its existing infrastructure are likely to perform most favourably in this regard.
- 6.2.39 Significant positive effects are identified for **Scenario 1**, and to a slightly lesser extent **Scenario 2**. This is primarily due to the scale of growth directed to the most economically advantageous locations. In **Scenario 1**, the concentration of the highest level of growth at Moreton-in-Marsh maximises opportunities for investment, labour supply and access to employment. **Scenario 2** also performs strongly through directing a substantial proportion of growth to Moreton-in-Marsh, supporting investment and economic activity whilst maintaining a strong relationship with the town's employment base.
- 6.2.40 **Scenarios 3 and 5** also perform positively, particularly through the inclusion of a higher level of growth at Ampney Crucis, which benefits from its proximity to Cirencester and strengthens links to the district's principal employment centre.
- 6.2.41 **Scenarios 4 and 6** similarly perform well and result in positive effects; however, the lower level of growth at Ampney Crucis results in comparatively fewer economic benefits. Whilst Mickleton also benefits from access to nearby employment opportunities and Honeybourne railway station, a proportion of these economic relationships are focused outside of the district, meaning they are likely to generate slightly fewer benefits for the district's economy overall.
- 6.2.42 **Scenario 7** performs least favourably in comparative terms, as it limits growth at Moreton-in-Marsh and directs a greater proportion of development to locations with a more limited economic role. Nevertheless, it is still expected to result in positive effects overall, reflecting the continued delivery of mixed-use development and associated employment opportunities.

Equalities

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	4	3	1	5	2	6	7
Significance	+	+	++	+	++	+	+/-

Appraisal

- 6.2.43 Effects on equality are influenced by the distribution of growth in relation to access to services, housing, employment and infrastructure. The assessment considers the extent to which development supports access to opportunities for different groups, including those in more disadvantaged areas, and whether growth helps to address identified inequalities.
- 6.2.44 In this context, rural inaccessibility is an important factor influencing inequality across the district, and development that improves connectivity and access to services can help reduce disparities between more and less deprived areas. However, it is also noted that approximately 80% of the district falls within the Cotswolds National Landscape, which may limit opportunities for strategic-scale infrastructure and intervention.
- 6.2.45 All scenarios are expected to result in positive effects by meeting the Local Housing Need. This supports the delivery of new homes across the district, including affordable housing, and is likely to benefit those experiencing barriers to accessing suitable housing. However, the extent to which this results in positive equalities outcomes depends on the location, type, size, and design of development and access to services, rather than overall scale alone. As such, higher growth scenarios (**Scenarios 1 to 4**) may provide additional benefits in terms of housing provision, but these benefits are more strongly influenced by how well development is aligned with accessible locations and areas of identified need.
- 6.2.46 At Moreton-in-Marsh, the settlement benefits from a relatively strong range of services, facilities and transport connections, including a railway station. Directing growth to this location is likely to improve access to services and support inclusive communities. **Scenario 1** performs most favourably in this respect, as it delivers the highest level of growth and maximises access to services and infrastructure. **Scenarios 2 to 6** also perform well, although benefits are more moderate. **Scenario 7** performs less favourably, as it includes the lowest level of growth and therefore provides fewer opportunities to improve access to services and facilities.
- 6.2.47 At Mickleton, access to services and facilities is more limited than at larger settlements such as Moreton-in-Marsh. However, residents benefit from proximity to Chipping Campden, Honeybourne railway station and other nearby destinations, helping to provide access to a wider range of services and opportunities. According to the Index of Multiple Deprivation (IMD), the

settlement is also within one of the more deprived areas of the district in relation to barriers to housing and services. Higher levels of growth (**Scenarios 1, 2, 3, 4 and 7**) may provide some benefits in terms of supporting local services and increasing housing provision. However, these are unlikely to significantly reduce reliance on travel, although they may help to reduce journey lengths and improve access to nearby services and facilities. **Scenarios 5 and 6**, which reduce growth, result in more limited local benefits but are more proportionate to the settlement's role.

- 6.2.48 At Ampney Crucis, the settlement is located approximately 2.5km to the east of Cirencester and is identified by the IMD as being within one of the more deprived areas in terms of living environment and barriers to housing and services in the district. Growth at this location is likely to provide benefits by improving access to housing and supporting nearby services and employment opportunities. Scenarios with higher levels of development at Ampney Crucis (particularly **Scenarios 3 and 5**) provide the greatest opportunity to address identified inequalities, while lower growth scenarios (**Scenarios 4, 6, and 7**) deliver more limited benefits. **Scenarios 1 and 2** do not include growth at this location and therefore do not contribute to addressing inequalities in this area.
- 6.2.49 Across all scenarios, strategic allocations are expected to deliver supporting infrastructure, including green infrastructure and community facilities. This is important in equalities terms, as access to open space and local services supports health, wellbeing and quality of life. Scenarios that deliver growth at a sufficient scale and in accessible locations (particularly **Scenario 1**) are more likely to support coordinated provision of green infrastructure and community facilities. In contrast, scenarios with lower growth or reduced development at key locations (particularly **Scenario 7**) are likely to provide more limited opportunities for strategic infrastructure delivery, relying more on smaller, site-level provision.

Conclusion

- 6.2.50 **Scenario 3** performs most favourably, as it combines growth at Moreton-in-Marsh with higher levels of development at Ampney Crucis, helping to improve access to housing and services in a more disadvantaged area (reflecting IMD data) while maintaining good access to facilities and infrastructure. **Scenario 5** also performs well, as it also includes a higher level of development at Ampney Crucis albeit alongside reduced growth at Mickleton.
- 6.2.51 **Scenario 2** performs positively overall, directing relatively high growth to Moreton-in-Marsh and higher growth to Mickleton, thereby supporting housing delivery and access to services in accessible locations. Whilst it does not include development at Ampney Crucis, it continues to provide strong equalities benefits through growth at settlements with existing services, facilities and infrastructure. **Scenario 1** performs similarly, as it maximises growth at the most accessible settlement and supports the

delivery of housing and infrastructure. However, the scale of growth proposed under **Scenario 2** is likely to be more proportionate and may therefore be more effective in ensuring that new residents are able to access services and infrastructure without placing additional pressure on existing provision.

6.2.52 **Scenario 4** performs moderately, as it includes a higher level of development at Mickleton, which contributes to addressing housing need in a more deprived area. However, whilst the village benefits from proximity to Honeybourne railway station and nearby service centres such as Chipping Campden, limited public transport connectivity reduces the extent to which this development improves access to services and opportunities, particularly for residents without access to a private vehicle. The proposed development may nevertheless support improvements to local public transport and reduce journey lengths to nearby services and facilities, partially offsetting these limitations.

6.2.53 **Scenario 6** reduces development at both Ampney Crucis and Mickleton, limiting the extent to which identified inequalities are addressed. **Scenario 7** performs least favourably, as it delivers lower levels of growth at Moreton-in-Marsh and Ampney Crucis, reducing opportunities to improve access to services and address inequalities in more disadvantaged areas. While the scenario still provides some equalities benefits through additional housing provision, these are more limited overall compared to other scenarios.

Green Infrastructure and Natural Capital

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	3	4	6	5	2	1	7
Significance	+/-	+/-	+/-	+/-	+/-	+/-	--

Appraisal

6.2.54 Effects on green infrastructure and natural capital are influenced by the scale, location and form of development, particularly the extent of greenfield land take and the potential to deliver coordinated networks of open space, habitat and landscape features through the design of new development areas. The assessment therefore considers both the loss of natural assets and the opportunities to enhance green infrastructure through strategic masterplanning.

6.2.55 All development is assumed to deliver Biodiversity Net Gain in accordance with national policy; however, this does not fully offset the loss of natural capital associated with greenfield land take, particularly where impacts occur at a larger scale. It is recognised that due to the scale of growth required to meet housing and employment needs, and consideration of brownfield land availability across the district, greenfield land take is

inevitable. Nonetheless, it is also recognised that strategic-scale developments can provide significant opportunities for green infrastructure delivery, including open space, SuDS, habitat creation and ecological enhancement, and may achieve biodiversity improvements above the minimum requirements of national policy.

- 6.2.56 At Moreton-in-Marsh, all scenarios involve development on greenfield land, resulting in some loss of natural capital. However, as all scenarios comprise strategic-scale allocations, each provides opportunities to deliver coordinated and multifunctional green infrastructure through masterplanning. **Scenario 1** results in the greatest extent of land take, including development to the north, east and south of the settlement, increasing the potential loss of greenfield land and associated features, including areas of woodland habitat and land adjacent to grassland habitat. However, **Scenario 1** also provides the greatest opportunity for comprehensive green infrastructure provision due to its scale and the delivery of a full link road, which, as a linear feature, may facilitate the creation of green infrastructure corridors incorporating habitat connectivity, landscaping and active travel routes, while also helping to reduce traffic pressures within the town centre. **Scenarios 2 to 6** also provide opportunities for such corridors through partial delivery of the link road. **Scenario 7** results in the lowest level of land take but, in the absence of a link road, limits opportunities to deliver connected green infrastructure at a strategic scale, with more fragmented and site-level provision likely.
- 6.2.57 At Mickleton, higher growth scenarios (**Scenarios 1, 2, 3, 4 and 7**) would result in more intensive use of the land and greater pressure on existing natural capital, although the absence of extensive ecological designations limits the sensitivity of the site overall, especially in the northern parcel. However, there is a relatively small area of deciduous woodland within western parcel, which would be sensitive to development (from both direct and indirect effects). **Scenarios 5 and 6** reduce the scale of development and are therefore likely to result in less intensive impacts and allow greater flexibility for the retention and integration of green infrastructure.
- 6.2.58 At Ampney Crucis, differences also relate to the intensity of development. No priority habitats are present within the development area itself; however, an area of priority habitat is located to the north of the site. Higher growth scenarios (**Scenarios 3 and 5**) would increase pressure on natural capital and could give rise to indirect effects on the adjacent habitat, for example through increased recreational disturbance or edge effects. However, they may also provide greater opportunity to deliver coordinated and multifunctional green infrastructure, including open space and habitat connectivity at a meaningful scale. Lower growth scenarios (**Scenarios 4, 6, and 7**) may perform more favourably in this respect by allowing greater provision of green infrastructure buffers along the northern edge, helping to safeguard the adjacent priority habitat and strengthen ecological networks.

Scenarios 1 and 2 do not include development at this location and therefore avoid impacts on natural capital in this area.

Conclusion

- 6.2.59 Across all scenarios, the delivery of mixed-use strategic allocations provides opportunities to incorporate green infrastructure as part of masterplanning. Differences between scenarios relate less to the presence of green infrastructure, and more to the extent of coordination, connectivity and sensitivity to local constraints. Scenarios including delivery of the link road (**Scenarios 1 to 6**) provide opportunities to establish green corridors alongside infrastructure, supporting habitat connectivity, sustainable drainage and active travel, while also helping to reduce traffic pressures within Moreton-in-Marsh. **Scenario 7** performs least favourably in this respect, as the absence of a link road and more dispersed pattern of development limits the potential to deliver connected and multifunctional green infrastructure networks.
- 6.2.60 **Scenario 6** performs most favourably, as it reduces development at both Mickleton and Ampney Crucis, limiting pressure on natural capital within the smaller settlements while still allowing for green infrastructure delivery through the link road at Moreton-in-Marsh. **Scenario 5** performs similarly, as it retains the level of development at Moreton-in-Marsh, alongside reduced growth at Mickleton and increased growth at Ampney Crucis.
- 6.2.61 **Scenario 1** performs relatively well, as the delivery of a full link road provides the greatest opportunity to establish continuous green infrastructure corridors in Moreton-in-Marsh. However, this is balanced against the significant loss of natural capital associated with the overall scale of development and the presence of existing habitats across the development area. **Scenario 2** also performs well, reflecting the avoidance of impacts on natural capital at Ampney Crucis whilst retaining opportunities for coordinated green infrastructure provision associated with the link road at Moreton-in-Marsh.
- 6.2.62 **Scenario 4** performs moderately, while **Scenario 3** performs comparatively less favourably. In both cases, higher levels of development at Mickleton and/or Ampney Crucis increase pressure on natural capital, including areas with identified sensitivities, reducing the overall effectiveness of green infrastructure provision despite opportunities associated with link road delivery at Moreton-in-Marsh.
- 6.2.63 **Scenario 7** performs least favourably, as the absence of link road infrastructure limits opportunities to deliver connected green infrastructure corridors, and the more fragmented pattern of development reduces the potential for integrated and multifunctional network provision.

Healthy and Vital Communities

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	5	2	6	3	4	1	7
Significance	+/-	+/-	+/-	+/-	+/-	+	-

Appraisal

- 6.2.64 Effects on healthy and vital communities are influenced by the scale and distribution of growth, particularly in relation to access to services, community infrastructure, open space and opportunities for social interaction. The assessment also considers the extent to which development supports community cohesion and whether the scale of growth is appropriate to the role and character of each settlement. In particular, development that is proportionate to the size and function of settlements is more likely to support cohesive and resilient communities.
- 6.2.65 At Moreton-in-Marsh, the settlement benefits from a relatively strong range of services, facilities and transport links, including a railway station. This contributes to its classification as a Principal Settlement within the district, and a sustainable location for accommodating growth and supporting access to services, which are important for health and wellbeing. However, the settlement has already experienced significant levels of recent growth, and high level of additional development (particularly under **Scenario 1**) may place pressure on existing infrastructure, services and community facilities, with the potential for short-term adverse effects. While higher growth may support the delivery of more strategic infrastructure, including a full link road under **Scenario 1**, and improved access to services and public transport, the scale of development may affect community wellbeing if not appropriately coordinated. **Scenarios 2 to 6** also enable delivery of a south-eastern link road, and while still representing substantial growth, provide a more balanced scale of development that is likely to support its delivery alongside wider wellbeing benefits, including reducing traffic congestion within the town centre, improving air quality, and enhancing safety. In contrast, **Scenario 7** would deliver the least amount of growth at Moreton-in-Marsh across the scenarios. Whilst this may reduce pressure on services, this approach is less likely to deliver strategic infrastructure, meaning that existing issues such as congestion and associated impacts on health and wellbeing may persist or worsen over time.
- 6.2.66 Mickleton is one of the smaller Principal Settlements in the district, with a population of approximately 2,300 (2021 Census). Higher levels of growth (**Scenarios 1, 2, 3, 4 and 7**) would represent a substantial increase relative to its size. This has the potential to affect the character of the settlement and may place pressure on local services and facilities, which are limited in scope. While some growth may support local services and community

vitality, significant expansion may alter the sense of place and reduce community cohesion. **Scenarios 5 and 6**, which reduce the scale of development, are more proportionate to the size and function of the settlement and are therefore likely to perform more favourably in maintaining a balanced and cohesive community.

- 6.2.67 At Ampney Crucis, the settlement is defined as ‘open countryside’ in the settlement hierarchy, with a population of around 650 (2021 Census). As such, higher levels of growth (**Scenarios 3 and 5**) would represent a significant increase relative to its existing size and may affect the character and cohesion of the village. However, the settlement benefits from its proximity to Cirencester, providing access to a wider range of services and facilities. This is likely to support residents’ access to healthcare, education and other essential services. **Scenarios 4, 6 and 7**, which assume lower levels of development, are more proportionate to the size of the settlement and are therefore more likely to maintain community cohesion, although growth is still relatively high compared to the existing population size. **Scenarios 1 and 2**, which do not include growth at Ampney Crucis, avoid effects on the settlement. It is worth also noting that due to the level of growth proposed through **Scenarios 3-7**, it is likely that they would result in a reclassification of the village within the settlement hierarchy.
- 6.2.68 Across all scenarios, the delivery of strategic allocations provides opportunities to incorporate community facilities, open space and green infrastructure as part of masterplanning. These elements are important for supporting health, wellbeing and social interaction. Scenarios that concentrate growth at Moreton-in-Marsh (particularly **Scenario 1**) are more likely to support coordinated infrastructure provision. However, very high levels of growth may place pressure on existing services if delivery is not timely, which, in-combination with recent growth patterns at Moreton-in-Marsh, may exacerbate existing issues. In contrast, **Scenario 7** limits growth at Moreton-in-Marsh but does not deliver a link road and is less likely to support the delivery of other strategic and supporting infrastructure, reducing opportunities to address existing issues such as congestion and associated impacts on community wellbeing.

Conclusion

- 6.2.69 **Scenario 6** performs most favourably, as it maintains a high enough level of development at Moreton-in-Marsh to secure the south eastern section of the link road, while reducing development at both Mickleton and Ampney Crucis. This supports community cohesion and limits pressure on services and infrastructure at smaller settlements, while still enabling the delivery of strategic infrastructure at Moreton-in-Marsh.
- 6.2.70 **Scenario 2** also performs well, as it supports delivery of the south-eastern link road at Moreton-in-Marsh whilst avoiding development at Ampney Crucis altogether, although growth at Mickleton remains relatively high.

- 6.2.71 **Scenario 4** performs moderately, as although it retains relatively high levels of growth at Mickleton, the lower level of development at Ampney Crucis is more proportionate to the size and function of the village and reduces pressure on community facilities and cohesion.
- 6.2.72 **Scenario 5** performs less favourably than **Scenarios 6, 2 and 4**, as the higher level of development at Ampney Crucis would represent a substantial increase relative to the size of the settlement and may affect community cohesion and local character. However, reduced growth at Mickleton results in a more balanced distribution of development across the district.
- 6.2.73 **Scenario 1** performs less favourably overall, as the significant scale of development at Moreton-in-Marsh and Mickleton is likely to place pressure on services, infrastructure and community facilities. While it enables the delivery of a full link road and supports access to services, the scale of growth may affect community wellbeing if not carefully managed.
- 6.2.74 **Scenario 3** performs less favourably still, as higher levels of development at both Mickleton and Ampney Crucis increase pressure on smaller settlements, with potential effects on community cohesion and local service capacity.
- 6.2.75 **Scenario 7** performs least favourably, as although it limits growth at Moreton-in-Marsh, it does not deliver a link road and is less likely to support the delivery of wider strategic infrastructure. At the same time, it retains relatively high levels of development at Mickleton, which may be disproportionate to its size and function, meaning existing issues such as congestion and associated impacts on health and wellbeing may persist or worsen.

Historic environment

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	2	1	7	=4	=4	3	=4
Significance	+/-	+	--	-	-	+/-	-

Appraisal

- 6.2.76 Effects on the historic environment are influenced by the location, scale and form of development, particularly in relation to the presence of heritage assets and the potential for impacts on their setting and significance. The assessment also considers the character of historic settlements and the extent to which new development may affect local townscape and sense of place. This is particularly important in the district, which has a highly sensitive historic environment baseline, reflecting the distinctive historic towns and villages of the Cotswolds, many of which are extensively

covered by conservation area designations and contain a high concentration of listed buildings.

- 6.2.77 At Moreton-in-Marsh, no designated heritage assets are located within the identified development areas. As such, direct impacts on designated assets are unlikely. However, the scale of growth (particularly under **Scenario 1**) would represent a substantial expansion of the settlement, which will affect its historic townscape and character including the setting of conservation areas on approach into the town. **Scenarios 2 to 6**, which reduce the level of growth and limit expansion to the south and east, are likely to result in more contained effects. **Scenario 7** further reduces the scale of development and is therefore likely to have the least effect on the character of the settlement, although all scenarios would require careful design to ensure integration with the existing built form.
- 6.2.78 At Mickleton, no designated heritage assets are located within the development areas. However, they do lie in proximity to the Mickleton Conservation Area, and the western part of the development area extends closer to the setting of the Cotswolds National Landscape, both of which contribute to the historic character of the settlement. Higher levels of growth (**Scenarios 1, 2, 3, 4 and 7**) would result in more substantial expansion and may result in greater effects on the setting of the Conservation Area and the historic character of the village. **Scenarios 5 and 6**, which reduce the scale of development, are likely to result in more limited effects and be more proportionate to the existing settlement form.
- 6.2.79 At Ampney Crucis, no designated heritage assets are located within the development areas. However, the sites lie close to the Ampney Crucis Conservation Area, and development has the potential to affect its setting. Given the small size of the settlement, higher levels of growth (particularly **Scenarios 3 and 5**) would represent a substantial increase relative to the existing village, with the potential for significant adverse effects on its historic character and the setting of the Conservation Area. **Scenarios 4, 6, and 7**, which assume a lower level of development, are likely to reduce these effects, although any development would need to be sensitively designed to preserve the setting of the Conservation Area. **Scenario 1** avoids these effects, as no strategic growth is proposed at this location.
- 6.2.80 Across all scenarios, the absence of designated heritage assets within the development sites limits the potential for direct effects. The main differences between scenarios relate to the scale of development and the extent to which this affects the setting and character of existing settlements. Scenarios that propose higher levels of growth at smaller settlements are more likely to result in changes to historic character that are less proportionate to the existing scale of development.

Conclusion

- 6.2.81 **Scenario 2** performs most favourably, as it avoids development at Ampney Crucis, thereby avoiding impacts on the most sensitive settlement in heritage terms. In addition, the reduced level of growth at Moreton-in-Marsh is likely to result in more contained effects on the historic townscape and character of the settlement when compared with **Scenario 1**.
- 6.2.82 **Scenario 1** also performs favourably, as it similarly avoids development at Ampney Crucis. However, the substantially higher level of growth proposed at Moreton-in-Marsh would represent a greater expansion of the settlement and has greater potential to affect its historic character and the setting of conservation areas on approaches into the town.
- 6.2.83 The other scenarios all include growth at Moreton-in-Marsh, Mickleton, and Ampney Crucis, with varying levels of growth. In this regard, **Scenario 6** performs most favourably, as it includes the lowest levels of growth at the two most sensitive settlements (Ampney Crucis and Mickleton), along with a moderate level of growth in Moreton-in-Marsh.
- 6.2.84 **Scenarios 4, 5 and 7** perform broadly equally, as each introduces higher levels of development at one of the two smaller settlements (Mickleton or Ampney Crucis), resulting in comparable effects on historic character and setting overall.
- 6.2.85 **Scenario 3** performs least favourably, as it combines high levels of development at both Mickleton and Ampney Crucis, increasing the potential for changes to the setting and character of both settlements.

Housing

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	4	1	2	3	5	6	7
Significance	+	++	++	++	+	+	+

Appraisal

- 6.2.86 Effects on housing are influenced by both the quantity and location of development, including the ability to meet identified needs, deliver affordable housing and provide housing in sustainable and accessible locations. The assessment also considers whether development can be supported by appropriate infrastructure and whether the distribution of growth is appropriate across the district.
- 6.2.87 All scenarios are expected to have positive effects, as they meet LHN and support the delivery of new homes across the district, including affordable housing. Scenarios that deliver higher overall levels of growth provide greater flexibility in the housing land supply and are more likely to improve

affordability outcomes. In particular, scenarios that achieve a 5% buffer above the LHN (**Scenarios 1 to 4**) provide greater resilience in the housing supply over the plan period. In contrast, lower growth scenarios provide less flexibility and may be more sensitive to changes in delivery assumptions over the plan period.

- 6.2.88 At Moreton-in-Marsh, the settlement is well connected, with access to services, employment opportunities and public transport, including a railway station. Directing growth to this location supports the delivery of housing in a sustainable and accessible location. However, the settlement has experienced significant recent growth, and the ability to accommodate further development is influenced by infrastructure capacity. However, it is expected that proposals will provide a package of new infrastructure. **Scenario 1** delivers the highest level of growth, which maximises housing supply but may place pressure on infrastructure and raise deliverability concerns. In contrast, **Scenario 7** limits growth at this location, which reduces pressure on services but potentially underutilises a sustainable and well-connected settlement. **Scenarios 3 to 6**, while still delivering a high level of housing, provide a relatively more balanced level of growth, which is likely to be more proportionate to the settlement's role and better aligned with infrastructure capacity.
- 6.2.89 At Mickleton, higher levels of growth (**Scenarios 1, 2, 3, 4 and 7**) would make a notable contribution to overall housing supply. While Mickleton is classified as a Principal Settlement, the town has a limited range of existing services and facilities. Therefore, Mickleton represents a relatively less sustainable location for accommodating significant levels of housing growth when compared with the district's larger settlements. The scale of development relative to the existing population would result in a significant expansion and may present challenges in delivering appropriate infrastructure and services to support new housing. **Scenarios 5 and 6** reduce the level of development at Mickleton, resulting in a comparatively more proportionate distribution of housing across the village. Nonetheless, strategic-scale development may provide opportunities to enhance local services, infrastructure and connectivity and improve the overall sustainability of the settlement.
- 6.2.90 At Ampney Crucis, the settlement benefits from its proximity to Cirencester, which provides access to a wide range of services, facilities and employment opportunities. Growth at this location can therefore contribute positively to housing delivery in a relatively sustainable location. Higher growth scenarios (**Scenarios 3 and 5**) deliver the greatest number of homes at this location, while lower growth scenarios (**Scenarios 4, 6, and 7**) provide a reduced but still meaningful contribution. However, as with Mickleton, the scale of development relative to the existing population would be significant and may require substantial infrastructure provision to support new communities. **Scenarios 1 and 2** do not include growth at

Ampney Crucis and therefore do not contribute to housing supply in this location.

- 6.2.91 Across all scenarios, strategic allocations are expected to deliver mixed-use schemes which increase the potential to provide affordable housing alongside market housing. Scenarios with higher total housing numbers (particularly **Scenarios 1 to 4**) are likely to provide the greatest opportunity to deliver affordable housing and secure infrastructure contributions. However, these benefits must be balanced against the ability of settlements to accommodate growth and the timely delivery of supporting infrastructure. This is relevant across all locations, as both high absolute growth (at Moreton-in-Marsh) and high relative growth (at Mickleton and Ampney Crucis) may present delivery challenges particularly over the short-term, due to the longer lead-in times for strategic development.

Conclusion

- 6.2.92 **Scenario 2** performs most favourably, as it delivers a high level of housing and achieves a 5% headroom above the LHN, providing flexibility in supply and strong opportunities to deliver affordable housing in sustainable locations.
- 6.2.93 **Scenario 3 and Scenario 4** also perform strongly, as both deliver a high level of housing and achieve a 5% headroom above the LHN, providing greater flexibility in supply and strong opportunities to deliver affordable housing.
- 6.2.94 **Scenario 1** also performs well, as it provides the highest overall level of housing. However, the scale of development may raise deliverability and supporting infrastructure concerns, which reduces its overall performance.
- 6.2.95 **Scenarios 5, 6 and 7** perform positively, as they meet the LHN and contribute to housing delivery across the district. However, they do not provide the same level of flexibility or resilience in housing supply as higher growth scenarios.

Landscape

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	4	3	=6	5	2	1	=6
Significance	-/+	+/-	--	--	-/+	-/+	--

Appraisal

- 6.2.96 Effects on landscape are influenced by the location, scale and form of development, particularly in relation to the Cotswolds National Landscape and locally designated Special Landscape Areas (SLAs). The assessment considers the extent to which development may affect the character, quality

and setting of these landscapes, as well as the character of settlements and their surrounding countryside.

- 6.2.97 The Cotswolds National Landscape covers approximately 80% of the district and represents a significant constraint to development. While all strategic allocations are located outside of the National Landscape, they are in close proximity and therefore have the potential to affect its setting. In addition, several sites relate to SLAs, which protect valued landscapes and, in some cases, provide an important buffer to the National Landscape. As such, all scenarios have the potential to result in landscape effects, with the magnitude dependent on the scale and location of development.
- 6.2.98 At Moreton-in-Marsh, development areas are located outside of the National Landscape but are associated with the Moreton-in-Marsh SLA. The southern development area, which is present in all scenarios, lies within the SLA, while the northern development area (included in **Scenario 1** only) is also located within the SLA. Development to the east (present in all scenarios) lies within the setting of the SLA. **Scenario 1**, which includes the highest level of growth and expansion to the north, east and south, is likely to result in the greatest impact on landscape character, including the loss of land within the SLA and a more substantial change to the settlement's rural edge. **Scenarios 3 to 6** reduce the scale of growth and avoid development to the north, thereby limiting effects. **Scenario 7** further reduces the scale of development and is likely to result in the least pronounced effects at this location. The relatively lower-lying topography of the area may help to reduce longer-distance visibility, although localised effects on landscape character are still expected.
- 6.2.99 At Mickleton, all scenarios include development to both the north and west of the settlement. However, the key distinction relates to the scale and distribution of development within this area. The western part of the development area lies adjacent to the Cotswolds National Landscape (to the south) and Norton Hall SLA (to the west), making it particularly sensitive. Higher growth scenarios (**Scenarios 1, 2, 3, 4 and 7**) are likely to require development closer to these sensitive areas and increase the overall extent and intensity of change, thereby increasing the potential for adverse effects on the setting of the National Landscape and the SLA, as well as the overall visual prominence of the settlement. Given this sensitivity, scenarios with maximum levels of development at Mickleton are considered to have the greatest landscape effects. In contrast, lower growth scenarios (**Scenarios 5 and 6**) may allow development to be located further from the most sensitive areas, reducing potential impacts, although some negative effects are likely to still occur. The relatively lower-lying topography of Mickleton may limit wider visibility to some extent, but potential effects on local views are likely to remain.
- 6.2.100 At Ampney Crucis, development areas are located outside of the National Landscape and are less closely associated with designated landscapes.

The lower-lying topography relative to the Cotswolds to the north may help to limit effects on the wider setting of the National Landscape. However, the rural character of the settlement means that any significant increase in built form is likely to result in changes to local landscape character and the settlement edge. Given the current population of approximately 650, even lower growth scenarios (**Scenarios 4, 6, and 7**) represent a substantial increase in scale, while higher growth scenarios (**Scenarios 3 and 5**) could result in development that approaches or exceeds a doubling of the settlement size. This would introduce a more urbanising influence and result in more noticeable effects on the character of the village and its rural setting. Lower growth scenarios (**Scenarios 4, 6, and 7**) would reduce the scale of this change, although some negative effects would remain.

Scenarios 1 and 2 avoid impacts at this location.

- 6.2.101 Across all scenarios, larger-scale development is more likely to result in adverse effects on landscape character, particularly in smaller, more rural settlements where change may appear more pronounced. While high-quality design and green infrastructure can reduce effects, they are unlikely to fully offset the influence of scale, particularly in relation to settlement expansion and landscape setting. Scenarios that combine higher levels of development at Mickleton with additional growth at other settlements are therefore considered to result in the greatest overall landscape effects.

Conclusion

- 6.2.102 **Scenarios 6 and 5** perform most favourably with regard to landscape effects, as both reduce the scale of development at the most sensitive settlement considered for strategic growth (Mickleton), limiting impacts on the National Landscape and SLA, although some localised effects remain.
- 6.2.103 **Scenario 2** performs relatively well, as it avoids development at Ampney Crucis and reduces the scale of growth at Moreton-in-Marsh compared to **Scenario 1**, thereby limiting effects on landscape character whilst retaining opportunities for coordinated masterplanning and mitigation.
- 6.2.104 Mixed effects are anticipated for **Scenario 1**. While it includes maximum growth at Mickleton and a high level of development at Moreton-in-Marsh, increasing pressure on the landscape in these settlements, it avoids development at Ampney Crucis and the associated effects on the rural character and settlement edge of the village.
- 6.2.105 **Scenario 4** performs moderately, as it includes lower levels of development at Ampney Crucis but also includes maximum growth at Mickleton. Whilst effects at Ampney Crucis are less pronounced than under the higher growth scenario, development would still represent a substantial increase in the scale of the village and result in some adverse landscape effects.
- 6.2.106 **Scenarios 3 and 7** perform least favourably. **Scenario 3** includes maximum growth at both Mickleton and Ampney Crucis, resulting in the greatest overall landscape effects at these two sensitive settlements.

Scenario 7 also includes maximum growth at Mickleton and, while it reduces development at Ampney Crucis, it provides less opportunity for coordinated mitigation at Moreton-in-Marsh due to a more fragmented pattern of development.

- 6.2.107 It is recognised that growth through all scenarios has the potential to impact the integrity of the Cotswolds National Landscape and Special Landscape Areas within the district. The various local design guidance documents prepared by the Council outline that it is important that new development, whilst respecting local character, develops a sense of place alongside individuality of design and identity of character, for new development areas. In addition, the Cotswolds National Landscape Management Plan contains a comprehensive summary of the key issues facing the Cotswolds National Landscape, and the management policies and actions needed to conserve and enhance this special place. The emerging development management policies in the Plan should aim to address the key challenges / threats / opportunities for the National Landscape to manage the potential cumulative and in-combination effects from additional growth.

Land, soils and water resources

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	7	3	5	4	2	1	6
Significance	--	+/-	-	-	+/-	+/-	--

Appraisal

- 6.2.108 Effects on land, soils and water resources are influenced by the scale and location of development, particularly in relation to the loss of agricultural land, impacts on water quality and availability, and the ability to manage runoff and drainage. The assessment considers the extent of greenfield land take, the quality of agricultural land affected, and the sensitivity of water environments.
- 6.2.109 The district is identified by the Environment Agency as being seriously water stressed, meaning that the availability of water resources is a key constraint to development. In addition, all development areas fall within Nitrate Vulnerable Zones, indicating sensitivity to water pollution. As such, all scenarios have the potential to result in adverse effects, particularly in relation to water demand and water quality.
- 6.2.110 At Moreton-in-Marsh, development areas are predominantly greenfield, with only limited previously developed land in the eastern development area (included in all scenarios). The northern and eastern areas are largely Grade 3a agricultural land, while the southern parcel includes a mix of Grade 2, 3a and 3b land. As such, development would result in the loss of best and most versatile (BMV) agricultural land in all scenarios, with

Scenario 1 resulting in the greatest loss due to the scale of development and inclusion of the northern and southern parcels. The southern development area also contains the River Evenlode, which increases the sensitivity of this location in relation to water quality and runoff. While all scenarios include this parcel, higher levels of development may increase the risk of adverse effects. However, the scale of development in **Scenario 1** may also provide greater opportunities to deliver coordinated SuDS and green infrastructure to manage runoff effectively. **Scenarios 2 to 6** reduce the scale of development and therefore limit land take, while **Scenario 7** further reduces impacts but may offer less opportunity for strategic mitigation.

- 6.2.111 At Mickleton, all development areas are greenfield and include high-quality agricultural land, with the northern parcel comprising largely Grade 2 land and the western parcel including areas of Grade 1 and 3b land. As such, development would result in the loss of BMV agricultural land. Norton Brook runs along the edge of the western parcel, increasing the sensitivity of this area in terms of water quality and runoff. Higher growth scenarios (**Scenarios 1, 2, 3, 4 and 7**) are more likely to increase pressure on this watercourse and result in greater loss of agricultural land. Lower growth scenarios (**Scenarios 5 and 6**) reduce the extent of these impacts and allow greater flexibility to avoid the most sensitive areas and incorporate mitigation measures.
- 6.2.112 At Ampney Crucis, development areas are also greenfield but are classified as Grade 3b agricultural land, which is of lower quality than that found at Mickleton and parts of Moreton-in-Marsh, and not considered to be BMV land. As such, the loss of agricultural land is less significant in comparative terms. However, all scenarios would still result in the permanent loss of undeveloped land. Higher growth scenarios (**Scenarios 3 and 5**) would increase the scale of land take and associated water demand, while lower growth scenarios (**Scenarios 4, 6 and 7**) would reduce these effects. **Scenarios 1 and 2** avoid impacts at this location.
- 6.2.113 Across all scenarios, larger-scale development provides increased opportunities to incorporate green infrastructure and SuDS to manage surface water runoff, reduce pollution risk and support water efficiency measures. However, higher levels of development also increase pressure on water resources and can result in greater land take. Conversely, lower levels of development reduce pressure on land and water resources but may limit opportunities for coordinated, strategic mitigation.

Conclusion

- 6.2.114 **Scenarios 6 and 5** perform most favourably, as they limit development at Mickleton, thereby limiting the loss of high-quality agricultural land and reducing pressure on sensitive water environments.

- 6.2.115 **Scenario 2** performs relatively well, as it avoids development at Ampney Crucis whilst delivering a medium-high level of development at Moreton-in-Marsh. This limits the loss of agricultural land and reduces pressure on water resources whilst retaining opportunities for coordinated mitigation measures.
- 6.2.116 **Scenarios 4 and 3** perform moderately, as both include higher levels of development at Mickleton, resulting in a potentially greater loss of BMV agricultural land and increased pressure on water resources. **Scenario 4** is more favourable than **Scenario 3** due to the lower level of growth at Ampney Crucis.
- 6.2.117 **Scenario 7** performs less favourably, as while it limits the overall level of development, it still includes high levels of growth at Mickleton and potentially limits opportunities for implementing coordinated mitigation measures at Moreton-in-Marsh.
- 6.2.118 **Scenario 1** performs least favourably, as it results in the greatest overall land take, including loss of BMV agricultural land at both Moreton-in-Marsh and Mickleton, and increases pressure on water resources.

Transport and Air Quality

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
Rank	6	1	5	3	4	2	7
Significance	+/-	++	+/-	+/-	+/-	++	--

Appraisal

- 6.2.119 Effects on transport and air quality are influenced by the scale and distribution of development, particularly in relation to access to services, employment and sustainable transport networks. The assessment considers the extent to which development supports walking, cycling and public transport use, reduces reliance on private vehicles and minimises traffic congestion and associated emissions.
- 6.2.120 At Moreton-in-Marsh, the settlement benefits from relatively strong transport connections, including a railway station and access to a range of services and facilities. This supports a greater potential for sustainable travel patterns and reduces reliance on the private car compared to more rural settlements. This is reflected in Government Connectivity Tool scores, which indicate accessibility in the range of 20 to 50 across the development areas (100 being the highest and 0 being the lowest), with the northern and southern parcels performing more strongly. **Scenario 1** includes development across the full extent of the site, including the northern and southern development areas, which performs most strongly in accessibility terms. This enables the most effective use of the settlement's sustainable

transport potential, although the scale of development may place increased pressure on existing transport infrastructure, including public transport services. **Scenarios 2 to 6** avoid development in the northern parcel and instead focus growth to the south and east, which results in a lower overall level of development at this settlement. This reduces pressure on the transport network but also limits the extent to which the most accessible areas of the settlement are utilised. While **Scenario 7** further reduces development at Moreton-in-Marsh, it does not include delivery of the link road, increasing transport pressure due to lack of strategic interventions and potentially exacerbating through-traffic within the town.

- 6.2.121 At Mickleton, accessibility to services, employment and public transport is more limited than at the larger settlements, reflected in its current connectivity scores, which typically fall within the 20 to 30 range. However, in the context of the wider district, the settlement performs relatively well and benefits from proximity to Honeybourne railway station (approximately 4 km to the west), which provides access to the rail network, albeit typically requiring car travel to get to the station. As such, while the settlement remains somewhat reliant on private vehicle use, it represents one of the more accessible locations in the district, which in turn may help to reduce journey lengths by private vehicles. Higher levels of growth (**Scenarios 1, 2, 3, 4 and 7**) would be expected to increase travel demand, including car-based trips, and place additional pressure on the local road network. However, this is consistent with patterns of growth across the district more generally, particularly outside settlements with direct rail access. Lower growth scenarios (**Scenarios 5 and 6**) reduce the scale of development and therefore limit these effects, although all scenarios would be expected to increase car use to some degree.
- 6.2.122 At Ampney Crucis, connectivity scores are broadly similar to Mickleton, with scores generally within the 20 to 30 range, although proximity to Cirencester provides access to a wider range of services and employment opportunities. This may support shorter journeys and some opportunities for active travel; however, access to public transport remains limited, and reliance on private vehicles is still likely. Higher growth scenarios (**Scenarios 3 and 5**) would result in increased traffic and associated emissions, while lower growth scenarios (**Scenarios 4, 6, and 7**) would reduce these effects. **Scenarios 1 and 2** avoid development at this location and therefore avoid associated transport impacts.
- 6.2.123 Across all scenarios, the distribution of development plays a key role in determining transport outcomes. Scenarios that concentrate growth at Moreton-in-Marsh make more efficient use of existing infrastructure and support more sustainable travel patterns. This hierarchy is reinforced by connectivity scores, which show Moreton-in-Marsh performing more favourably than Mickleton and Ampney Crucis. In addition, the provision of strategic infrastructure, particularly the link road, has the potential to help manage traffic flows, subject to detailed design and implementation.

Conversely, scenarios that direct a greater amount of growth to less accessible settlements are likely to increase reliance on private vehicles and result in higher emissions overall.

- 6.2.124 Regarding air quality, all scenarios are likely to result in some increase in emissions associated with additional traffic. However, effects are influenced by both the scale of development and the efficiency of the transport network. Scenarios that reduce congestion and support sustainable travel (**Scenarios 1 to 6**) are likely to perform more favourably, while those that increase reliance on private vehicles or lack supporting infrastructure, particularly **Scenario 7**, are likely to result in more adverse effects.

Conclusion

- 6.2.125 **Scenario 2** performs most favourably, as it directs a significant proportion of its growth to Moreton-in-Marsh, the most accessible settlement considered in the appraisal (as the only location with a railway station), whilst also directing growth to Mickleton, which benefits from proximity to Honeybourne railway station. The scenario avoids development at Ampney Crucis altogether and supports delivery of strategic transport infrastructure, helping to promote sustainable travel patterns and reduce reliance on private vehicles.
- 6.2.126 **Scenario 6** also performs strongly, as it limits development at Mickleton and Ampney Crucis, reducing reliance on private vehicles and associated emissions while maintaining moderate growth at Moreton-in-Marsh and supporting the delivery of strategic infrastructure.
- 6.2.127 **Scenario 4** also performs well, as it balances development across the district while limiting growth at Ampney Crucis compared to higher growth scenarios. While it includes increased development at Mickleton, this settlement performs relatively well in the context of the district, and the overall distribution supports access to infrastructure while managing transport impacts.
- 6.2.128 **Scenario 5** performs slightly less favourably, as higher levels of development at Ampney Crucis increase reliance on private vehicles and associated emissions, despite continued infrastructure provision at Moreton-in-Marsh.
- 6.2.129 **Scenario 3** performs comparatively less favourably, as higher levels of development at both Mickleton and Ampney Crucis increase overall travel demand and reliance on private vehicles, resulting in greater transport-related emissions.
- 6.2.130 **Scenario 1** performs less favourably, as the additional growth at Moreton-in-Marsh is largely in addition to, rather than instead of, development at less accessible settlements, resulting in increased overall travel demand despite the benefits associated with its location. While Moreton-in-Marsh

supports more sustainable travel patterns and enables delivery of a full link road, the increased overall scale of development may place additional pressure on the transport network, reducing the overall effectiveness of sustainable travel options.

- 6.2.131 **Scenario 7** performs least favourably, as it includes relatively high levels of development at Mickleton while limiting growth at Moreton-in-Marsh and does not deliver strategic transport infrastructure, including a link road. This results in greater reliance on private vehicles, increased congestion and higher transport-related emissions overall.

6.3. Summary of appraisal findings

- 6.3.1 The appraisal identifies that all scenarios are likely to result in a combination of positive, mixed and negative effects across the IIA topics. This reflects the inherent trade-offs associated with accommodating growth, particularly in a district characterised by a high-quality environmental baseline and a dispersed settlement pattern. While all scenarios meet LHN and employment land requirements and provide opportunities for economic growth, they differ in how effectively they balance environmental, social and economic objectives.
- 6.3.2 Significant positive effects are identified across several scenarios, although the drivers of these effects vary. Higher growth scenarios, particularly **Scenario 1** performs particularly strongly in relation to economic development and climate change mitigation through the concentration of growth at Moreton-in-Marsh, the district's most accessible settlement, and the delivery of a full link road which supports strategic infrastructure provision. **Scenario 2** also performs strongly across a range of topics, including housing, transport and air quality, and the historic environment, reflecting a more balanced level of growth at Moreton-in-Marsh with a south-eastern link road, whilst similarly avoiding growth at Ampney Crucis. **Scenarios 3, 4 and 5** also perform positively in several topics through their contribution to housing delivery, economic growth and the delivery of strategic infrastructure, including the south-eastern link road at Moreton-in-Marsh.
- 6.3.3 However, these positive effects are accompanied by trade-offs, particularly in relation to environmental topics. Scenarios which include higher levels of development at the smaller settlements (Mickleton and Ampney Crucis), introduce greater potential for adverse effects on biodiversity, landscape character, the historic environment and natural capital. This reflects both the sensitivity of these locations and the scale of development relative to the size and function of the settlements. These scenarios are also more likely to result in increased reliance on private vehicles, contributing to higher transport-related emissions.

- 6.3.4 Scenarios that reduce development at Mickleton and Ampney Crucis (particularly **Scenarios 1, 2, and 6**) perform more favourably in environmental terms by limiting impacts on sensitive receptors and reducing pressure on smaller settlements. This approach supports a more proportionate distribution of development and reduces the extent of landscape, biodiversity and land-use effects. However, lower growth scenarios also involve trade-offs, including reduced flexibility in housing supply, lower economic benefits and, in the case of the lowest growth scenarios (particularly **Scenario 7**), more limited opportunities to support strategic infrastructure and coordinated mitigation.
- 6.3.5 The appraisal also highlights an important distinction between the benefits of concentrating development in the most accessible location and the effects associated with overall scale and distribution of growth. While directing development to Moreton-in-Marsh supports sustainable travel and climate change mitigation, higher overall levels of growth (particularly where development is delivered alongside, rather than instead of, growth in less accessible settlements) can increase total travel demand and place additional pressure on infrastructure. This demonstrates that outcomes are influenced not only by where development is located, but also by the overall quantum of growth and its distribution.
- 6.3.6 Overall, the appraisal demonstrates that each scenario presents a different balance of sustainability effects. The key trade-offs relate to the scale of growth, the distribution of development between settlements, and the extent to which development can be delivered in a coordinated manner alongside infrastructure and mitigation measures.
- 6.3.7 A summary of the appraisal findings is provided in **Table 6-2**.

Table 6-2: Reasonable growth scenarios appraisal summary, including overall rankings and likely significant effects

Topic		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
 Biodiversity	Rank	6	4	5	3	2	1	7
	Significance	+/-	+/-	+/-	+/-	+/-	+/-	--
 Climate Change (adaptation)	Rank	6	3	5	4	2	1	7
	Significance	+/-	+/-	+/-	+/-	+	+	--
 Climate Change (mitigation)	Rank	1	2	6	4	5	3	7
	Significance	+/-	+/-	+/-	+/-	+/-	+/-	--
 Economy and Employment	Rank	1	2	3	5	4	6	7
	Significance	++	++	++	++	++	++	+/-
 Equalities	Rank	4	3	1	5	2	6	7
	Significance	+	+	++	+	++	+	+/-
 Green Infrastructure and Natural Capital	Rank	3	4	6	5	2	1	7
	Significance	+/-	+/-	+/-	+/-	+/-	+/-	--
 Healthy and Vital Communities	Rank	5	2	6	3	4	1	7
	Significance	+/-	+/-	+/-	+/-	+/-	+	-

Topic		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
 Historic Environment	Rank	2	1	7	=4	=4	3	=4
	Significance	+/-	+	--	-	-	+/-	-
 Housing	Rank	4	1	2	3	5	6	7
	Significance	+	++	++	++	+	+	+
 Landscape	Rank	4	3	=6	5	2	1	=6
	Significance	-/+	+/-	--	--	-/+	-/+	--
 Land, Soil and Water Resources	Rank	7	3	5	4	2	1	6
	Significance	--	+/-	-	-	+/-	+/-	--
 Transport and Air Quality	Rank	6	1	5	3	4	2	7
	Significance	+/-	++	+/-	+/-	+/-	++	--

7. The preferred approach

- 7.1.1 The preferred approach of the Cotswold District Local Plan 2026-2043 meets (and exceeds) LHN and employment land requirements through a spatial strategy focused on the district's most sustainable settlements, whilst avoiding significant growth within the Cotswolds National Landscape. This preferred approach aligns with **Scenario 2** tested through the IIA.
- 7.1.2 The preferred approach directs the majority of development to Cirencester and Principal Settlements, with most development coming forward through strategic-scale allocations capable of delivering supporting infrastructure, services and facilities alongside new development. Approximately 87% of proposed development is located at Cirencester and Principal Settlements, with 13% directed to Non-Principal Settlements. In addition, approximately 95% of proposed development is located outside of the Cotswolds National Landscape, with the limited development proposed within the designation restricted to smaller sites unless exceptional circumstances apply. Approximately 73% of development is directed to the south of the district, reflecting the concentration of services, employment opportunities and sustainable transport connections in and around Cirencester.
- 7.1.3 Strategic growth maximises opportunities to deliver infrastructure, including schools, local centres, community facilities, public transport improvements and cycling, walking and wheeling connections, whilst also supporting comprehensive masterplanning and coordinated delivery. As the majority of new development is proposed on strategic allocations that realistically, take some time before they are delivering housing at their optimum level, it is necessary to propose a 'stepped' housing trajectory. This essentially means the plan would support the delivery of different levels of housing in five-year periods, with less than the annualised need (for the whole Plan period) proposed for the first five years, and more, in the last five years. It is proposed that 400 homes would be delivered each year for the first five years (2026 to 2031), 1,050 per year for years six to ten (2031 to 2036), and 1,524 per year for years eleven to fifteen (2036 to 2043).
- 7.1.4 The preferred approach is underpinned by a broad spatial strategy that remained consistent across all of the reasonable alternatives assessed through the IIA process. This includes strategic allocations at Cirencester, Preston, Siddington, Down Ampney, Fairford, Kemble and the proposed new settlement at Driffield, together with a range of non-strategic allocations distributed across Principal and Non-Principal Settlements. The IIA reasonable alternatives assessment therefore focused on the principal variable elements of the strategy, namely the distribution and scale of development at Moreton-in-Marsh, Mickleton and Ampney Crucis. In this respect, the preferred approach aligns with **Scenario 2**, comprising medium-high growth at Moreton-in-Marsh, higher growth at Mickleton and no strategic growth at Ampney Crucis.

- 7.1.5 The preferred approach is also consistent with national policy relating to strategic-scale and mixed-use development. Paragraph 77(b) of the NPPF recognises that large numbers of homes can often be most effectively delivered through larger-scale developments, including significant urban extensions, and that such developments should support sustainable communities with access to services and employment opportunities. Paragraph 111(a) further supports an appropriate mix of uses within larger-scale developments in order to minimise the number and length of journeys required for employment, shopping, leisure, education and other day-to-day activities. The preferred approach reflects these principles through the allocation of comprehensively master planned mixed-use sites capable of delivering housing, employment land, schools, local centres, community facilities and green infrastructure in a coordinated manner.
- 7.1.6 A key component of the preferred approach is the allocation of 2,200 dwellings to the south and east of Moreton-in-Marsh, together with a comprehensive package of supporting infrastructure, including a new secondary school and a new road connecting the A429 and A44. This level of development is considered sufficient to support significant infrastructure delivery whilst avoiding the substantially larger scale of growth that would be required to facilitate a full link road around the settlement. Land is also safeguarded to support the delivery of additional development and the completion of the link road through a future plan-making process, should sufficient funding and growth requirements arise.
- 7.1.7 The preferred approach also includes a strategic allocation of 1,238 dwellings at Mickleton, together with associated infrastructure including a primary school, local centre, public transport improvements, open space and green infrastructure. Mickleton is relatively unconstrained in the district context, located outside the Cotswolds National Landscape and within proximity of Honeybourne railway station, Chipping Campden and employment opportunities at Meon Vale and Long Marston. The preferred approach therefore seeks to utilise one of the more sustainable locations in the north of the district whilst supporting its long-term sustainability.
- 7.1.8 The preferred approach does not include strategic growth at Ampney Crucis. Whilst the village was considered through the IIA reasonable alternatives appraisal, the preferred approach instead focuses strategic growth in settlements considered better able to accommodate significant development and supporting infrastructure. This approach helps to direct growth towards more sustainable locations whilst reducing potential impacts associated with substantial growth at a relatively small village.
- 7.1.9 Employment provision is focused alongside strategic housing growth at locations including Cirencester, Fairford, Kemble and Driffield, supporting a closer relationship between homes, jobs and services.

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

8. Introduction to the appraisal

8.1. Appraisal methodology

- 8.1.1 **Part 2** of this IIA Report presents an appraisal of the draft Plan against the IIA Framework, with the findings presented under each of the IIA themes.
- 8.1.2 The appraisal in **Part 2** has been prepared in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations, assessing the likely significant effects of the Plan.

8.2. Policies included in the Regulation 19 version of the Local Plan

- 8.2.1 **Table 8-1** presents the policies in the Regulation 19 version of the Local Plan. In the following appraisal chapter these policies will be referred to by their reference (for example, 'CP1').
- 8.2.2 The draft Plan includes 'core policies' and 'development policies'. The **Core Policies** set out the strategic approach for the district, addressing the overall **Spatial Strategy** and key strategic matters such as housing, employment, infrastructure and environmental protection. The **Development Policies** provide more detailed criteria to guide decision-making and to support the delivery and implementation of the Core Policies when determining planning applications.

Table 8-1: Policies in the Regulation 19 version of the Local Plan

Policy reference Policy name

Spatial Strategy	
Core Policy 1	Addressing Climate Change
Core Policy 2	Meeting Housing Needs in Cotswold District - Strategic Allocations
Core Policy 2a	Stepped Housing Trajectory
Core Policy 3	Meeting Housing Needs in Cotswold District - Non-Strategic Allocations
Core Policy 4	Settlement Hierarchy
Core Policy 5	Meeting Employment Needs in Cotswold District
Core Policy 6	Infrastructure Delivery
Cirencester and Surrounding Villages Area Strategy	
Core Policy 7	Cirencester and Surrounding Villages Area Strategy

Policy reference Policy name

Core Policy 8	Cirencester and Surrounding Villages Area Strategic Infrastructure
Core Policy 9	Safeguarding of Land for Strategic Infrastructure Schemes in the Cirencester and Surrounding Villages Area Strategy Area
Core Policy 10	Cirencester Central Area Strategy
Core Policy 11	Special Policy Areas – Royal Agricultural University
South Cotswold Strategy Area	
Core Policy 12	South Cotswold Strategy Area
Core Policy 13	South Cotswold Strategic Infrastructure Delivery
Core Policy 14	Safeguarding of Land for Strategic Infrastructure Schemes in the South Cotswold Area
Core Policy 15	Cotswold Airport
Core Policy 16	Thames and Severn Canal
Core Policy 17	The River Thames
Core Policy 18	Cotswold Lakes: Post-Mineral Extraction After Use
North Cotswold Area Strategy	
Core Policy 19	North Cotswold Strategy Area
Core Policy 20	North Cotswold Strategic Infrastructure Delivery
Core Policy 21	Safeguarding of Land for Strategic Infrastructure Schemes in the North Cotswold Area
Core Policy 22	Gloucester and Cheltenham Green Belt
Core Policy 23	Former Cheltenham to Stratford-Upon-Avon Railway Line
Core Policy 24	Special Policy Area – Campden BRI
Core Policy 25	Special Policy Area – Fire Service College
Sustainable Construction and Renewable Energy	
Core Policy 26	Retrofitting and Decarbonisation of Existing Buildings
Core Policy 27	Net Zero Carbon New Buildings
Core Policy 28	Renewable and Low Carbon Energy Generation, Storage and Transmission
Core Policy 29	Wind Energy Development
Core Policy 30	Roof-Mounted and Ground-Mounted Solar Panels
Core Policy 31	Community Renewable Energy Schemes

Policy reference Policy name

Core Policy 32	Low Carbon Heat Networks
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Transport

Core Policy 33	Sustainable Transport & Connectivity
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Core Policy 34	Assessing and Managing Transport Impacts
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Core Policy 35	Active Travel: Walking, Cycling & Wheeling
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Core Policy 36	Healthy, Safe and Inclusive Design
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Core Policy 37	Public Transport, Shared Transport and Interchanges
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Core Policy 38	Our Kerbside Space and Parking
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Core Policy 39	Electric and Low Emission Vehicles
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Core Policy 40	Aerodrome Safeguarding
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Housing

Core Policy 41	Standards for New Residential Development
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Core Policy 42	Affordable Housing
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Core Policy 43	Self-build and Custom-build Housing
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Core Policy 44	Specialist Accommodation
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Core Policy 45	Gypsy and Traveller Accommodation
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Development Policy 1	Affordable Housing on Rural Exception Sites
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Development Policy 2	Community Led-Housing
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Development Policy 3	Dwellings for Rural Workers Outside Development Boundaries
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Development Policy 4	Removal of Occupancy Conditions
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Development Policy 5	Replacement Dwellings
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Economy, Retail and Tourism

Core Policy 46	New Employment Development
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Core Policy 47	Safeguarding Established Employment Sites
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Core Policy 48	Ancillary Uses on Employment Sites
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Core Policy 49	Development of Tourist Facilities and Visitor Attractions
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Core Policy 50	Tourist and Visitor Accommodation
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Policy reference Policy name

Core Policy 51	Town Centre Uses
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Core Policy 52	New Local Centres
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Development Policy 6	Rural Diversification
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Development Policy 7	Conversion of Rural Buildings
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Development Policy 8	New Agricultural and Forestry Development
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Development Policy 9	Equestrian Related Development
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Historic Environment

Core Policy 53	The Historic Environment
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Core Policy 54	Listed Buildings
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Core Policy 55	Conservation Areas
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Core Policy 56	Non-Designated Heritage Assets
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Core Policy 57	Archaeological Assets
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Core Policy 58	Registered Parks and Gardens
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Core Policy 59	The Conservation of Non-Domestic Historic Buildings (Designated and Non-Designated Heritage Assets)
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Natural Environment

Core Policy 60	Biodiversity and Geodiversity
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Core Policy 61	Local Green Space
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Core Policy 62	Landscape
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Core Policy 63	Managing Flood Risk
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Core Policy 64	Water Management Infrastructure
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Core Policy 65	Watercourses
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Core Policy 66	Pollution and Contaminated Land
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Core Policy 67	Air Quality
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Development Policy 10	Trees, Hedgerows and Woodlands
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Development Policy 11	Dark Skies
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Building Healthy and Sustainable Communities

Policy reference Policy name

Core Policy 68	Planning for Health and Well-being
Core Policy 69	Good Design Outcomes and Process
Core Policy 69a	Good Design Outcomes and Process for Strategic Allocations
Core Policy 70	Green and Blue Infrastructure
Core Policy 71	Management of Accessible Green Open Spaces in Residential Developments
Core Policy 72	Social and Community Infrastructure
Core Policy 73	Telecommunications Infrastructure
Monitoring and Implementation	
Core Policy 74	Monitoring and Implementation

9. Appraisal of the Regulation 19 version of the Local Plan

9.1. Appraisal

- 9.1.1 The appraisal is presented below as a series of narrative discussions under the IIA framework. For each IIA theme, a commentary is presented on the spatial strategy and the Plan as a whole and concludes with a summary table of the likely significant effects (see **Table 9-1** to **Table 9-12**).

Biodiversity

Commentary on the spatial strategy

- 9.1.2 The spatial strategy set out in the Regulation 19 version of the Local Plan (hereafter referred to as ‘the Plan’) has important implications for biodiversity, particularly given the sensitive environmental context of the district, where large areas are subject to national landscape and ecological designations. The strategy seeks to balance the delivery of housing and employment growth with the need to protect and enhance ecological assets.
- 9.1.3 A strength of the spatial strategy is its use of a settlement hierarchy (**CP4**) to direct development towards the most sustainable locations in the district. By focusing the majority of growth in Principal and Non-Principal Settlements, the strategy is likely to reduce pressure on more remote and less disturbed areas of the countryside, which can be particularly important for protecting sensitive habitats and ecological networks. Concentrating development in locations with existing infrastructure and services also helps to limit the spread of incremental development across the wider rural area, which could otherwise lead to habitat fragmentation over time.
- 9.1.4 The allocation of development across a range of settlements, including both strategic allocations (**CP2**) and non-strategic allocations (**CP3**), provides a degree of flexibility and allows growth to be distributed across the district. This may help to avoid excessive pressure on single locations, particularly those with high environmental sensitivity. At the same time, the requirement for masterplanning and comprehensive site design offers opportunities to incorporate green infrastructure, habitat creation and ecological enhancements within larger sites, potentially delivering local biodiversity gains where implemented effectively. Nevertheless, due to the spatial constraints of the district, the distribution of allocated sites still has the potential to place development in proximity to sensitive ecological features in some locations. In this regard:
- 20 allocations are located within 10 km of an internationally designated site.

- all allocations are located within 5 km of a nationally designated biodiversity site (including six allocations which are located within approximately 100 m of a Site of Special Scientific Interest (SSSI)).
 - eight allocations are located within 2 km of a Local Nature Reserve; and
 - several allocations contain, or are adjacent to, priority habitats, ancient woodland, woodland identified in the National Forest Inventory, and habitats which may function as supporting habitat for protected species.
- 9.1.5 Whilst direct effects on these designations are unlikely, development has the potential to result in indirect effects including increased recreational pressure, habitat fragmentation, disturbance to species and impacts on ecological connectivity. However, **Policy CP60**, together with the allocation-specific concept frameworks and development templates, requires habitat retention and enhancement, ecological buffers, biodiversity net gain and green infrastructure corridors, providing a framework through which potential biodiversity effects can be avoided, reduced or mitigated.
- 9.1.6 The spatial strategy recognises the importance of environmental capacity, as set out in **CP4**. This allows for adjustments to the distribution of development where environmental constraints, including those relating to biodiversity, limit the capacity of settlements to accommodate growth. This is an important safeguard, as it provides a mechanism to avoid development in the most sensitive locations and redistribute growth to areas with lower ecological value or greater capacity to accommodate change. However, the effectiveness of this approach will depend on how these considerations are applied in practice and whether ecological constraints are given sufficient weight in decision-making. In particular, where sites are taken forward despite the presence of constraints, there remains potential for adverse effects which will need to be addressed through detailed design and mitigation. This is further considered in the 'commentary on the plan as a whole' section, below.
- 9.1.7 The area-based strategies (**CP7, 12 and 19**) promote the delivery of housing, employment and infrastructure together, which can support more sustainable patterns of development. However, the scale of growth proposed in some areas, particularly where multiple allocations are located in close proximity, raises the potential for cumulative effects on biodiversity, including increased recreational pressure, habitat fragmentation and changes to local hydrology. Whilst cumulative effects cannot be ruled out, particularly where multiple allocations are proposed in proximity to ecological receptors, the widespread incorporation of green infrastructure, ecological corridors and recreational mitigation measures should help to limit potential effects.

Commentary on the plan as a whole

- 9.1.8 A Habitats Regulations Assessment (HRA) has been undertaken and accompanies the Regulation 19 version of the Local Plan. HRA screening identified likely significant effects relation to physical damage and loss of habitat; non-physical disturbance; bird strike; air pollution from vehicle emissions and dust; recreation pressure; water quality from wastewater treatment and direct pollution; and water quantity. Whilst the subsequent Appropriate Assessment has ruled out some of these effects based on the mitigation measures provided in the Local Plan's policy framework, the HRA proposes additional policy recommendations for consideration by plan makers. It is anticipated that these measures will be incorporated into Plan, prior to submission.
- 9.1.9 Nonetheless, the Regulation 19 version of the Local Plan provides a strong and integrated framework for the conservation and enhancement of biodiversity, supported by a clear suite of policies covering designated sites, species protection, habitat networks and biodiversity net gain. Taken together, the policies move beyond a largely design-led approach and establish a more complete and robust basis for managing biodiversity impacts across the district. This is considered below.
- 9.1.10 A key strength of the Plan is the way biodiversity is embedded within wider sustainability and design policies. **CP1** promotes the provision of connected, accessible and multi-functional green spaces, alongside tree and hedgerow planting and measures to support nature recovery. This ensures that biodiversity considerations are built into the design of development from an early stage and are closely aligned with broader environmental outcomes. The requirement for Climate Change and Sustainability Statements further reinforces this approach by requiring applicants to demonstrate how biodiversity has been addressed in proportion to the scale of development.
- 9.1.11 This is strongly underpinned by **CP60**, which provides a clear and comprehensive framework for the protection of ecological assets. The policy applies the mitigation hierarchy, requiring avoidance, mitigation and compensation where impacts arise, and gives the highest level of protection to internationally designated sites, including SACs, SPAs and Ramsar sites. It also ensures protection for nationally and locally designated sites, priority habitats and protected species, with a clear expectation that development will be refused where significant harm cannot be adequately addressed. The inclusion of requirements for ecological surveys, biodiversity management measures and long-term maintenance significantly strengthens the effectiveness of the policy framework. The policy also includes specific mechanisms to address recreational pressures on Habitats Sites, requires biodiversity management and biosecurity measures where appropriate, and expects long-term maintenance arrangements to be secured through conditions or planning obligations.

- 9.1.12 **CP60** also introduces important safeguards for irreplaceable habitats, such as ancient woodland and veteran trees, making clear that their loss will only be permitted in exceptional circumstances. This is complemented by **DP10**, which provides additional protection for key landscape features that often form important components of ecological networks. Together, these policies ensure that both designated and non-designated assets are recognised and protected.
- 9.1.13 The Plan also maintains a strong focus on enhancement and connectivity. **CP70** requires development to contribute to multi-functional green and blue infrastructure networks, avoid fragmentation and improve connectivity, supported by long-term management arrangements. Similarly, **CP16, 17 and 23** support the role of linear corridors in strengthening ecological connectivity, while **CP18** promotes habitat creation and restoration at a landscape scale. **CP22** also contributes indirectly by limiting inappropriate development and helping to maintain the separation and openness of areas that can support ecological networks.
- 9.1.14 **CP61** also contributes positively by protecting designated Local Green Spaces from inappropriate development. Whilst primarily intended to safeguard valued community spaces, many of these sites also provide biodiversity value and support wider green infrastructure networks. **CP24** also includes site-specific requirements for the retention and enhancement of ecological features, including Key Wildlife Sites and existing vegetation, ensuring biodiversity considerations are embedded within these strategic locations. Supporting policies relating to rural land uses and development also help maintain habitat features within the wider countryside.
- 9.1.15 Design-led policies further reinforce biodiversity integration. **CP69 and 69a** require development to incorporate high-quality green spaces and biodiversity enhancements, while **CP68** promotes access to green spaces and connection with nature, recognising the wider benefits of biodiversity for communities. Together, these policies encourage development that contributes to both ecological quality and social value.
- 9.1.16 **CP30** includes safeguards to avoid harm to priority habitats and ecological networks, while encouraging appropriate siting in areas of lower ecological sensitivity.
- 9.1.17 Rural development policies also contribute positively to biodiversity outcomes. **DP8** requires the retention of hedgerows and the incorporation of measures to support wildlife, while **DP9** requires proposals to avoid harm to landscape features and ecological assets, including hedgerows and field margins. **DP7** provides additional protection by ensuring that ecological features such as bat roosts are not adversely affected.
- 9.1.18 The Plan is supported by **CP74**, which provides a mechanism to track delivery and respond where policy objectives are not being met. This is important in ensuring that biodiversity gains are achieved and maintained

over time. This is complemented by **CP71**, which requires the long-term management and maintenance of green spaces delivered through development, helping to secure biodiversity outcomes beyond the initial implementation stage.

Table 9-1: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Improved ecological resilience.	Direct, long-term, positive.	None proposed.
Improved ecological connectivity through green infrastructure and habitat corridors.	Direct, long-term, positive.	None proposed.
Increased habitat provision and enhancement through green and blue infrastructure.	Direct and indirect, long-term, positive.	None proposed.
Delivery of biodiversity net gain and nature recovery measures.	Direct, long-term, positive.	None proposed.

Climate change adaptation

Commentary on the spatial strategy

- 9.1.19 The spatial strategy set out in the draft Plan has a significant role in shaping how the district responds to the impacts of climate change, particularly in relation to flood risk, water management, overheating and the resilience of communities and infrastructure.
- 9.1.20 A key positive aspect of the strategy is its reliance on a settlement hierarchy (**CP4**) to direct development towards locations with existing services, infrastructure and accessibility. By focusing growth in Principal and Non-Principal Settlements, the strategy can reduce the need for dispersed development in rural areas where infrastructure may be less resilient to climate pressures. This approach also supports the more efficient provision of climate adaptation measures, such as sustainable drainage systems, heat mitigation through urban greening, and resilient transport networks, as these are often more viable and effective when delivered at scale within larger or more centralised developments.
- 9.1.21 The emphasis on strategic allocations (**CP2**) and associated masterplanning requirements provides further opportunities to embed climate adaptation into development at an early stage. Larger sites allow for the coordinated integration of measures such as surface water management systems, green infrastructure, shading and cooling strategies,

and layout design that responds to topography and natural features. If implemented effectively, this approach can increase the overall resilience of new communities to climate risks.

- 9.1.22 The site assessment evidence indicates that climate risks have been identified and considered through the allocation process. Strategic allocations at Moreton-in-Marsh, Down Ampney, Mickleton and Siddington contain areas affected by flood risk, whilst several allocations are located within areas susceptible to groundwater flooding. In response, the strategic site concept frameworks incorporate measures such as sustainable drainage systems, strategic green infrastructure, floodplain management and the use of open space to accommodate flood risk. Several non-strategic allocations, including sites at Down Ampney, Siddington, Lechlade, Blockley and Chipping Campden, also include site-specific requirements relating to flood risk avoidance, sustainable drainage and water management measures.
- 9.1.23 The inclusion of the environmental capacity adjustment within **CP4** is also relevant to climate adaptation. This provides flexibility to direct development away from locations where environmental constraints would lead to unacceptable impacts, which may include areas vulnerable to flooding, water stress or other climate-related hazards. This mechanism has the potential to reduce exposure to climate risks. Where development is taken forward in areas with existing constraints, there remains potential for increased exposure to climate risks unless these are effectively mitigated. In this regard, Policies **CP63** and **CP64** provide an important policy framework through which flood risk, surface water management and wider climate resilience considerations can be addressed.
- 9.1.24 The distribution of development across the three strategy areas (**CP7, 12 and 19**) helps to spread growth across the district, which may reduce pressure on any single location. However, this also means that development will take place in a variety of contexts, some of which may be more vulnerable to climate impacts than others. For example, the delivery of a new settlement at Driffild and several large urban extensions may introduce challenges related to water management, flood risk and exposure to changing weather patterns, depending on site-specific conditions. While strategic sites offer greater scope for coordinated mitigation, they also represent a large-scale and long-term commitment, making it particularly important that adaptation measures are embedded from the outset. The concept frameworks for the strategic allocations include measures such as sustainable drainage systems, green infrastructure networks, multifunctional open space and habitat corridors, which should contribute positively to climate resilience over the lifetime of the Plan.

Commentary on the plan as a whole

- 9.1.25 The Plan sets out a clear and comprehensive approach to climate change adaptation, primarily through **CP1**, supported by a wider framework of

design, green infrastructure and environmental policies. Taken together, these policies establish a consistent expectation that development will be designed to be resilient to current and future climate impacts.

- 9.1.26 **CP1** is central to the Plan's approach to climate change. It requires development to demonstrate how proposals will adapt to and be resilient to the impacts of climate change, including through site layout, building design and supporting infrastructure. The policy includes specific requirements such as the implementation of the cooling hierarchy, ensuring buildings are designed to respond to overheating risks through natural ventilation and shading, and promoting the efficient use of natural resources, including water and soil. The requirement to incorporate sustainable drainage systems (SuDS) and water efficiency measures is particularly relevant in managing increased surface water runoff and water resource pressures.
- 9.1.27 The policy also emphasises the role of green and blue infrastructure, requiring development to promote connected, accessible and multi-functional green spaces, including tree and hedgerow planting. This is reinforced by **CP70**, which explicitly identifies the role of green and blue infrastructure in responding to climate change and managing flood risk, and requires a design-led approach that integrates these features from the earliest stages of development. The focus on multifunctionality, connectivity and long-term management supports a more systemic approach to climate resilience.
- 9.1.28 Design-related measures are further supported through **CP69 and 69a**, which require development to incorporate passive design strategies, efficient use of resources and resilience to environmental conditions. The policy's emphasis on long-term adaptability and building lifespan also contributes to ensuring that development remains suitable under changing climatic conditions.
- 9.1.29 Adaptation is also addressed through the treatment of existing buildings. **CP26** supports proposals that improve energy efficiency and adaptability to climate change, including retrofitting and the incorporation of low carbon heating systems. For both modern and traditional buildings, the policy promotes a 'whole house' approach and encourages interventions that respond to climate impacts, while recognising the constraints associated with heritage assets.
- 9.1.30 Water management and flood resilience are addressed in detail through **CP63, 64 and 65**. These policies require development to apply a sequential approach to site selection, avoid areas at highest risk of flooding and demonstrate resilience over the lifetime of the development, taking account of climate change allowances. The requirement for site-specific Flood Risk Assessments, integrated and multi-functional Sustainable Drainage Systems (SuDS), and the use of natural flood management techniques provides a robust framework for managing increased flood risk and surface water pressures. In addition, **CP64** requires efficient use of

water resources and sets clear water efficiency standards, while also safeguarding water quality and infrastructure capacity. Together, these policies significantly strengthen the Plan's ability to respond to future climate-related risks associated with flooding, water scarcity and water quality.

- 9.1.31 The role of natural systems in supporting climate resilience is also reinforced through **CP60** and **DP10**, which protect and enhance habitats, trees and other landscape features. These elements contribute to climate adaptation by supporting functions such as shading, cooling, water regulation and soil stability. The protection of these features helps to maintain the natural capacity of the environment to respond to climate pressures.
- 9.1.32 The Plan also recognises the importance of landscape and environmental assets in supporting resilience. While not directly framed as an adaptation policy, **CP16** supports the restoration and enhancement of the canal, which can contribute to water management, ecological resilience and sustainable movement patterns. Similarly, requirements within **CP24** for flood risk assessment and mitigation, particularly at Campden BRI, demonstrate that climate risks are considered in site-specific contexts.
- 9.1.33 The scale of growth proposed through the spatial strategy, including the provision of a housing supply buffer above the identified requirement, may place additional pressure on natural systems that support climate resilience, such as floodplains, green spaces and water resources. The loss or alteration of these features could reduce the natural capacity of the landscape to manage climate impacts.
- 9.1.34 Finally, the Plan includes clear implementation mechanisms, including the requirement for a Climate Change and Sustainability Statement under **CP1** and the use of monitoring and review through **CP74**. This provides a structured framework to ensure that adaptation measures are addressed consistently and can be monitored over time.

Table 9-2: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Improved resilience to flood risk and climate-related hazards.	Direct, long-term, positive.	None proposed.
Increased use of sustainable drainage systems and water management measures.	Direct, long-term, positive.	None proposed.
Enhanced climate resilience through green and blue infrastructure.	Direct and indirect, long-term, positive.	None proposed.
Increased resilience of communities, buildings and infrastructure to future climate change.	Direct, long-term, positive.	None proposed.

Climate change mitigation

Commentary on the spatial strategy

- 9.1.35 The spatial strategy set out in the Plan plays an important role in influencing greenhouse gas emissions across the district, particularly through the location, scale and form of development, and the extent to which this supports more sustainable patterns of living. The overall approach reflects a clear intention to reduce emissions, although the outcomes will depend on how effectively spatial decisions reduce reliance on high-carbon activities, particularly travel.
- 9.1.36 The use of the settlement hierarchy (**CP4**) is effective for concentrating development in locations with the best access to services, jobs and public transport. By focusing the majority of growth in Principal and Non-Principal Settlements, the strategy supports shorter travel distances and increases the potential for walking, cycling and public transport use, which are critical for reducing transport-related emissions. This is particularly important in a largely rural district where car dependency can otherwise be high. Locating development in more connected settlements also makes it more feasible to provide infrastructure such as public transport services, active travel routes and low-carbon energy systems.
- 9.1.37 Whilst the settlement hierarchy generally directs growth towards the district's most sustainable locations, opportunities to support significant modal shift are constrained by the relatively limited rail network serving the district. In this context, the concentration of growth at Kemble and Moreton-in-Marsh is notable, as these settlements are served by rail stations. In addition, the strategic and non-strategic allocations at Mickleton will deliver homes located in proximity to Honeybourne railway station. Collectively, this represents that around 36% of new allocations are proposed either within settlements served by rail infrastructure or in locations with reasonable access to rail services. This should help support the use of more sustainable travel modes and reduce transport-related greenhouse gas emissions, although this will also depend on the quality of onward public transport and active travel connections.
- 9.1.38 The delivery of housing and employment through strategic allocations (**CP2 and 5**) provides further opportunities to support climate change mitigation. Larger sites allow for comprehensive masterplanning, which can incorporate compact layouts, mixed uses and integrated infrastructure. This can help reduce the need to travel and support more efficient patterns of development. The concept frameworks for the strategic allocations also include measures intended to reduce reliance on private car travel. For example, the strategic allocations at Steadings Southern Extension, Cirencester South East, Down Ampney and Driffield incorporate mobility hubs, active travel connections and public transport infrastructure, whilst the allocations at Kemble and Moreton-in-Marsh include active travel links

to rail stations and local centres. These measures should help support modal shift and reduce transport-related greenhouse gas emissions.

- 9.1.39 The requirement for infrastructure delivery (**CP6**) provides a mechanism to support climate mitigation by ensuring that development is accompanied by the necessary infrastructure, including transport and utilities. However, there is also the potential for investment in road infrastructure as part of supporting growth, particularly the proposed link road at the strategic allocation at Moreton-in-Marsh, which could reinforce car travel if not delivered alongside the active travel, public transport and mobility measures envisaged within the allocation. This highlights the importance of ensuring that infrastructure provision prioritises sustainable modes and low-carbon solutions in order to support the overall objectives of the strategy.

Commentary on the plan as a whole

- 9.1.40 The Plan establishes a comprehensive and detailed framework for climate change mitigation, with a clear focus on reducing greenhouse gas emissions across new development, existing buildings and the transport system. This is primarily delivered through a combination of climate, energy and transport policies, which together promote a transition to a net-zero carbon district and support the Plan's 'green to the core' ambitions.
- 9.1.41 **CP1** sets the overarching requirement that development must demonstrate how it will support an overall reduction in greenhouse gas emissions. The policy includes a wide range of mitigation measures that must be incorporated into development proposals. These include reducing the need to travel, promoting public transport and active travel, and providing electric vehicle charging infrastructure, all of which directly address transport-related emissions. The policy also promotes sustainable design and construction, the re-use of materials, and a 'circular economy' approach, alongside the use of materials with low embodied carbon. In addition, it requires development to contribute to the expansion of renewable and low carbon energy generation, ensuring that mitigation is embedded across design, construction and operation.
- 9.1.42 A key strength of the Plan is the introduction of a detailed and specific framework for building performance through **CP27**. This policy requires all new dwellings to be net zero carbon in operation, supported by requirements relating to low energy design, low carbon heating and on-site renewable energy generation. It includes quantified standards for space heating demand and energy use intensity, the requirement for development to be constructed without connection to the gas grid, and the expectation that renewable energy generation will match or exceed predicted energy demand where feasible. This provides a clear and measurable approach to reducing operational carbon emissions from new development.
- 9.1.43 The Plan also supports mitigation through policies relating to renewable and low carbon energy. **CP28** supports proposals that contribute to

meeting the district's electricity demand from renewable sources and enable further deployment of renewable energy. This is complemented by more specific policies such as **CP29 and 30**, which set out criteria for different types of renewable energy development, and **CP31** which supports locally-led initiatives. **CP32** further strengthens this approach by supporting the delivery of genuinely low carbon heat networks and setting clear standards for their design and operation, helping to address emissions associated with heating and supporting the transition away from fossil fuel-based systems. Together, these policies provide a broad and supportive framework for increasing renewable energy generation across the district.

- 9.1.44 Mitigation is also addressed through the treatment of existing buildings. **CP26** supports the retrofitting of buildings to improve energy efficiency, the use of low carbon heating systems, and the incorporation of micro-renewables. The policy applies the energy hierarchy, prioritising the reduction of energy demand, followed by efficiency improvements and renewable generation. It also recognises that the re-use of existing buildings can be more sustainable than demolition and rebuild, including in relation to embodied carbon.
- 9.1.45 Transport-related emissions are addressed through a comprehensive set of policies. **CP33**, together with **CP34 to 39**, place a clear emphasis on prioritising walking, cycling and public transport, reducing reliance on private vehicles, and supporting the transition to electric and low emission vehicles. These policies require development to be located in accessible locations, incorporate active travel infrastructure, provide public transport connectivity, and support shared mobility schemes. This is consistent with the requirements of **CP1** and provides a strong basis for reducing transport-related emissions over the plan period.
- 9.1.46 Infrastructure and movement corridors are also protected and enhanced in ways that support low-carbon travel. For example, **CP23** safeguards the potential restoration of a rail link, while **CP16** supports the restoration of the Thames and Severn Canal, which may provide opportunities for sustainable movement and recreation. Although not explicitly framed as mitigation policies, these provisions may support a shift towards more sustainable modes of travel.
- 9.1.47 In addition, the Plan recognises the role of natural assets in supporting climate change mitigation. For example, **DP10** requires the protection and enhancement of trees, woodlands and hedgerows, including ancient and veteran trees. These features contribute to carbon sequestration and help offset emissions, while also supporting wider environmental benefits. The encouragement of new tree planting, including woodland creation informed by local strategies, provides a complementary contribution to reducing the overall carbon footprint of development.

Table 9-3: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Reduced greenhouse gas emissions from new development.	Direct, long-term, positive.	None proposed.
Increased use of sustainable and active travel modes.	Direct and indirect, long-term, positive.	None proposed.
Increased deployment of renewable and low carbon energy.	Direct, long-term, positive.	None proposed.
Improved energy efficiency and net zero carbon building performance.	Direct, long-term, positive.	None proposed.
Enhanced carbon sequestration through protection and enhancement of natural assets.	Direct and indirect, long-term, positive.	None proposed.

Economy and employment

Commentary on the spatial strategy

- 9.1.48 The spatial strategy set out in the Plan plays a central role in shaping the distribution, accessibility and sustainability of employment opportunities across the district. It seeks to align the delivery of housing, jobs and infrastructure in a way that supports economic growth while maintaining the character of the area and ensuring that development is well-related to existing settlements and services.
- 9.1.49 By directing the majority of growth towards Principal and Non-Principal Settlements (**CP4**), the strategy focuses employment development in locations with the strongest existing service base, transport connectivity and labour market accessibility. This approach supports more sustainable commuting patterns and increases the potential for people to live closer to their place of work, helping to reduce travel distances and support local economies.
- 9.1.50 The provision of employment land through the spatial strategy is a particularly important aspect of the Plan. The Plan will deliver approximately 32 ha of new employment land, exceeding the identified requirement of approximately 29 ha over the plan period. This provides confidence that sufficient land is available to support forecast economic growth. The approach does not rely on standalone employment allocations; rather, employment growth is primarily delivered through mixed-use strategic allocations alongside the safeguarding and enhancement of existing employment sites across the district (**CP2 and CP5**), which presents clear opportunities to support self-contained and mixed communities. The distribution of employment land across the three strategy areas (**CP7, 12 and 19**) also helps to ensure that economic growth is not overly concentrated in a single location, but instead supports a more balanced pattern of development.

- 9.1.51 New employment allocations are distributed across a number of strategic sites, including approximately 8 ha at Cirencester and Surrounding Villages, 11 ha at Driffield, 4 ha at Fairford, and 9 ha at Kemble. This distribution broadly aligns employment growth with the main locations for housing growth, creating opportunities to reduce commuting distances and support more self-contained communities.
- 9.1.52 The concept frameworks for the strategic allocations demonstrate how employment uses will be integrated alongside housing, services and infrastructure. For example, the strategic allocations at Cirencester, Driffield and Fairford include mixed-use development, local centres and active travel connections intended to improve access to employment opportunities. Similarly, the employment provision at Kemble takes advantage of its proximity to the established business and aviation-related activities associated with Cotswold Airport, whilst the allocation at Mickleton will benefit from its proximity to Honeybourne and the wider employment market of north Cotswold settlements. These measures should help improve accessibility to employment opportunities and support local economic resilience.
- 9.1.53 The strategy also allows for additional employment development through windfalls and Neighbourhood Development Plans, providing flexibility to respond to changing economic conditions. This is important in supporting small-scale and rural businesses, which form a key part of the local economy.
- 9.1.54 The requirement for infrastructure delivery (**CP6**) supports the spatial strategy by ensuring that employment development is accompanied by the necessary infrastructure, including transport and utilities. This is key to ensuring that employment sites are attractive, accessible and viable.

Commentary on the plan as a whole

- 9.1.55 The Plan sets out a positive approach to supporting economic growth and employment, combining town centre regeneration, protection of key economic assets, provision of employment land, tourism development and support for the rural economy.
- 9.1.56 A key element of the Plan's approach is the promotion of vibrant and viable centres, particularly through **CP10** and **CP51**. These policies support a range of mixed-use development, including retail, leisure, cultural and office uses, alongside residential development. The focus on regeneration opportunity sites, diversification of uses and enhancement of town centres is likely to strengthen economic activity, footfall and employment opportunities, particularly in Principal and Non-Principal Settlements.
- 9.1.57 The Plan also identifies and supports the role of strategic economic assets and institutions. **CP11, CP24, and CP25** support the growth and long-term development of key sites such as the Royal Agricultural University, Campden BRI and the Fire Service College. These policies enable

expansion of education, research, training and business uses, which is likely to contribute to high-value employment sectors, skills development and innovation. The requirement for comprehensive masterplanning also supports coordinated and sustainable growth at these locations.

- 9.1.58 In addition, **CP15** safeguards an important employment site and supports aviation-related development and diversification, helping to maintain and enhance its economic role and resilience.
- 9.1.59 The Plan provides strong support for employment development more broadly through **CP46**, which provides positive support for new employment development, including the expansion of existing employment sites and the delivery of new employment opportunities in appropriate locations. It also supports small-scale employment development in rural areas, subject to appropriate criteria, including viability and scale. The policy promotes employment growth in professional, technical, 'green' and knowledge-based sectors, and supports sustainable working practices, which aligns with wider economic and environmental objectives.
- 9.1.60 This is complemented by **CP47**, which establishes a clear presumption in favour of retaining existing employment land and floorspace. The policy requires robust justification for any loss of employment land, including evidence of non-viability and marketing. This helps to ensure that existing employment capacity is protected, supporting long-term economic stability.
- 9.1.61 The Plan also supports the visitor economy, which is a significant component of the district's economic profile. **CP49 and 50** support the development of tourist facilities, attractions and accommodation, where proposals demonstrate economic benefits and are compatible with environmental constraints. This is reinforced by **CP17 and 18**, which support leisure and recreation uses. In addition, **CP53 to 59** relating to the historic environment play an important supporting role, helping to conserve and enhance heritage assets and conservation areas which form a key part of the district's visitor offer and overall economic appeal. Together, these policies promote a sustainable tourism sector, supporting local businesses and employment opportunities.
- 9.1.62 Support for the rural economy is provided through **DP6** and related policies, which enable diversification of agricultural and land-based businesses. This is further supported by **DP7**, which enables the re-use of existing buildings for alternative economic uses, and **DP8**, which supports the ongoing viability of land-based industries. **DP3** also contributes by supporting essential on-site accommodation where required for rural enterprises. **DP9** provides additional support for rural economic activity, recognising equestrian uses as part of the local economy where developed in a sustainable and appropriately scaled manner. The emphasis on re-use of existing buildings and support for low carbon rural enterprises provides opportunities for economic growth in rural areas, while maintaining environmental quality.

- 9.1.63 Infrastructure and connectivity are also recognised as essential to economic growth. **CP8, CP13, and CP20** support the delivery of strategic infrastructure across the three strategy areas, whilst **CP9, CP14, and CP21** safeguard land required for future infrastructure schemes. **CP20** further strengthens this approach by identifying specific infrastructure requirements, including strategic road and sustainable transport improvements, to support planned growth and economic activity. In addition, **CP37** supports improved connectivity and accessibility to employment opportunities, which can enhance labour market mobility and support business growth. **CP23** also safeguards longer-term opportunities for rail connectivity, which may support economic linkages and accessibility over time.
- 9.1.64 The Plan also recognises the importance of digital connectivity in supporting modern economic activity. **CP73** requires development to provide high quality and future-proofed telecommunications infrastructure, ensuring that residents and businesses have access to high-speed digital networks. This is particularly important for supporting home working, digital businesses and rural economic growth.

Table 9-4: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Increased employment opportunities across the district.	Direct, long-term, positive.	None proposed.
Delivery of employment land to support economic growth.	Direct, long-term, positive.	None proposed.
Improved alignment of housing and employment growth.	Direct and indirect, long-term, positive.	None proposed.
Support for town centres, tourism and the rural economy.	Direct and indirect, long-term, positive.	None proposed.
Improved infrastructure and connectivity to support business growth.	Direct, long-term, positive.	None proposed.

Equalities

Commentary on the spatial strategy

- 9.1.65 The spatial strategy plays a role in shaping how different groups across the district are able to access housing, services, jobs and everyday opportunities.
- 9.1.66 A central element of the strategy is the settlement hierarchy (**CP4**), which directs most development towards Principal and Non-Principal Settlements. These locations already benefit from a broader mix of services, employment opportunities and transport links, meaning that new development is more likely to be well connected. This is particularly important for people who may not be able to rely on private vehicles, as it

supports easier access to essential services such as healthcare, education and retail. By reinforcing these locations as the main focus for growth, the strategy has the potential to improve everyday accessibility for a wide range of residents.

- 9.1.67 At the same time, the strategy includes a significant number of non-strategic allocations across smaller settlements (**CP3**). This reflects an intention to support communities across the district rather than concentrating all development in a small number of locations. In some cases, this can help sustain local facilities and maintain the viability of smaller settlements. However, the level of accessibility in these locations is more variable, and in areas with limited services or transport connections, residents may still need to travel further to meet their daily needs. This may be more challenging for certain groups, particularly where access to transport is constrained. This introduces some variability in outcomes for different communities depending on location.
- 9.1.68 The larger strategic allocations (**CP2**) play an important role in shaping equalities outcomes. Sites such as the urban extensions and the proposed new settlement at Driffild provide opportunities to deliver new infrastructure, community facilities and local services alongside housing growth. If these developments are planned and delivered effectively, they can help create places where people are better able to access services locally. Their scale also increases the likelihood of securing integrated provision, although this will depend on delivery and design quality.
- 9.1.69 The spatial strategy also aligns housing growth with employment provision through **CP5** and the Area Strategies (**CP7, 12 and 19**). In principle, this creates opportunities for people to live closer to jobs, which can reduce travel times and improve access to employment.
- 9.1.70 Infrastructure delivery is identified as a key component of the strategy through **CP6**, which supports the provision of transport, services and facilities alongside new development. This has a direct bearing on equalities outcomes, as the timing and location of infrastructure will influence how easily people can access services.

Commentary on the plan as a whole

- 9.1.71 The Plan provides a broad framework that supports equalities and social inclusion, primarily through policies relating to access to services, inclusive design, housing provision and community infrastructure. While equalities is not addressed through a single standalone policy, it is embedded across a range of policy areas, particularly housing, transport and health.
- 9.1.72 A key component of the Plan's approach is ensuring that development is supported by appropriate infrastructure and services. **CP6** requires development to provide the necessary infrastructure to meet the needs arising from new development, supported by the Council's 'infrastructure-first' ambition. This includes social, community and service infrastructure,

which is critical to ensuring that new and existing communities have equitable access to facilities and services.

- 9.1.73 **CP52** also contributes positively to equalities by requiring new local centres within strategic allocations to provide access to services and facilities close to where people live. This may particularly benefit groups with more limited mobility or reduced access to private vehicles by improving access to shops, childcare, community facilities and other day-to-day services.
- 9.1.74 Accessibility is further supported through a strong focus on sustainable and inclusive transport. **CP33** prioritises walking, cycling and public transport, and requires development to integrate with existing networks and provide accessible and inclusive movement infrastructure. This is reinforced by **CP34**, which requires development to be located close to services and to demonstrate how sustainable travel opportunities have been maximised, and by **CP35**, which promotes safe and accessible routes for all users. These policies explicitly recognise the needs of people with disabilities and those with mobility needs, supporting more equitable access to employment, services and community facilities.
- 9.1.75 Access to services and facilities is further supported through policies such as **CP37**, which seeks to ensure that development is well connected to services, and **CP16**, which promotes improved access to recreational routes and public spaces. Digital connectivity is also addressed through **CP73**, which supports access to high quality digital infrastructure, helping to reduce inequalities related to connectivity and access to services. **CP8** and **CP20** also support the delivery of new education infrastructure, improving access to primary and secondary education and reducing the need for longer distance travel to schools.
- 9.1.76 Design also plays an important role in addressing equalities. **CP36** requires development to be inclusive, safe and accessible, and to provide appropriate infrastructure for different users, including pedestrians, cyclists and those using micromobility. The policy emphasises connectivity, safety and usability of the public realm, which are important factors in creating environments that can be used by a wide range of people. This is complemented by **CP69 and 69a**, which require early community engagement, comprehensive masterplanning and design coding for larger sites, helping to ensure that the needs of different groups are considered from the outset of the design process.
- 9.1.77 The Plan includes a strong framework for addressing housing needs across different groups, which is central to equalities. **CP41** requires a proportion of dwellings to meet accessible and adaptable standards (M4(2)) and wheelchair user standards (M4(3)), directly addressing the needs of people with mobility impairments.
- 9.1.78 This is complemented by **CP42**, which requires development to deliver a significant proportion of affordable housing and prioritises rented tenures,

helping to address housing affordability and access for lower income groups. **DP1** further supports the provision of affordable housing in rural areas, ensuring that local needs can be met where opportunities arise.

- 9.1.79 The Plan also provides targeted support for specific groups with particular housing needs. **CP44** supports accommodation for older people, people with disabilities and those requiring care or support, with requirements relating to accessibility, location and design. **CP45** identifies preferred sites and sets out a clear approach to meeting the needs of Traveller communities. Together, these policies provide a structured and inclusive approach to meeting a wide range of housing needs.
- 9.1.80 Health and wellbeing are also closely linked to equalities. **CP68** requires development to demonstrate how it contributes to reducing health inequalities, supports access to open space, and promotes inclusive and active environments. The requirement for Health Impact Assessments on larger developments provides a mechanism to consider how different groups may be affected by development.

Table 9-5: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Improved access to housing, services and employment opportunities.	Direct, long-term, positive.	None proposed.
Improved accessibility through inclusive and sustainable transport provision.	Direct, long-term, positive.	None proposed.
Increased provision of affordable, accessible and specialist housing.	Direct, long-term, positive.	None proposed.
Improved access to community infrastructure, facilities and digital connectivity.	Direct and indirect, long-term, positive.	None proposed.
Support for health, wellbeing and social inclusion.	Direct and indirect, long-term, positive.	None proposed.

Green infrastructure and natural capital

Commentary on the spatial strategy

- 9.1.81 The spatial strategy influences how green infrastructure and natural features are retained, enhanced and connected across the district, mainly through where development is directed and how growth is distributed between settlements.
- 9.1.82 A key feature is the focus on directing development to Principal and Non-Principal Settlements (**CP4**). This helps limit more widespread encroachment into the countryside and increases the opportunity to plan larger, more connected areas of green infrastructure within fewer locations. In these areas, there is greater scope to design green spaces, drainage

features and routes in a more coordinated way, rather than relying on smaller, isolated interventions.

- 9.1.83 Consequently, as major growth is primarily concentrated outside of the Cotswolds National Landscape, which covers approximately 80% of the district, the spatial strategy also safeguards green infrastructure networks across the nationally protected landscape.
- 9.1.84 Strategic allocations (**CP2**) on larger sites, including the main urban extensions and the proposed new settlement at Driffield, provide opportunities to incorporate multi-functional green infrastructure as part of a comprehensive layout, such as open space networks and integrated drainage. These sites can make a meaningful contribution to the overall green infrastructure network if designed well. However, they will also involve the loss of existing land and features, meaning outcomes will depend on how effectively new provision replaces or improves what is currently there. The concept frameworks for the strategic allocations incorporate extensive green infrastructure networks, strategic open space, active travel routes and sustainable drainage measures. In doing so, they provide opportunities to support a number of the priorities identified within the Cotswold Green Infrastructure Strategy, including improved access to natural greenspace, delivery of strategic walking and cycling connections, strengthened ecological networks and the incorporation of multifunctional green infrastructure within new development.
- 9.1.85 The strategy also spreads some growth across smaller settlements through non-strategic allocations (**CP3**). While individually modest, these sites may result in the gradual loss of local green features over time. Their contribution to green infrastructure is likely to be more limited in scale, and there is a greater risk that provision will be site-specific rather than part of a wider network, unless this is addressed through design and connectivity. However, the Cotswold Green Infrastructure Strategy identifies opportunities to improve the connectivity of green infrastructure networks, active travel routes and accessible natural greenspace across the district, particularly within and around the principal settlements. The development templates for non-strategic allocations require consideration of site-specific green infrastructure assets and connections, creating opportunities for individual developments to contribute towards the wider objectives and aspirations of the Green Infrastructure Strategy.
- 9.1.86 The delivery of supporting infrastructure (**CP6**) is relevant, as it can help ensure that green infrastructure is planned alongside other elements of development.

Commentary on the plan as a whole

- 9.1.87 The Plan provides a strong approach to green infrastructure and natural capital, with a clear focus on how natural features and spaces contribute to the quality, resilience and functioning of places.

- 9.1.88 A key strength of the Plan is the way green infrastructure is treated as an essential part of development, rather than something added at the end of the design process. **CP70** requires developers to plan green and blue infrastructure from the outset, ensuring it is properly integrated into the layout and structure of development. This includes creating spaces that serve more than one purpose, such as providing areas for recreation, managing surface water, supporting active travel and improving environmental quality. The focus on accessibility and usability ensures that green spaces are not only provided, but are also well-used and valued by local communities.
- 9.1.89 The Plan also reflects the idea of natural capital, recognising that natural features and systems provide measurable benefits over time. Policies such as **CP1**, **CP69** and **69a** require development to include features such as tree planting, green spaces and sustainable drainage systems. These elements contribute to a range of functions, including reducing flood risk, storing carbon, improving air quality and helping to regulate temperature, making places more resilient to climate change. This is further supported by **DP10**, which protects and enhances key natural assets that contribute to carbon storage, urban cooling and wider ecosystem services.
- 9.1.90 Another important aspect of the Plan is its focus on linking green spaces together. **CP70** expects development to connect into wider green infrastructure networks, rather than creating isolated spaces. This is supported by policies such as **CP16** and **CP23**, which protect and enhance key corridors across the district. These corridors not only support wildlife movement, but also provide routes for walking, cycling and recreation, making them important parts of the wider green infrastructure network. **CP60** further reinforces this approach by requiring development to contribute to ecological networks and habitat connectivity, supporting the wider functioning of natural systems.
- 9.1.91 The Plan also makes use of larger-scale opportunities to strengthen natural capital. **CP18**, for example, supports the reuse of former mineral sites in a way that provides recreation, landscape improvement and environmental benefits. In rural areas, policies such as **DP8** encourage the retention of features like hedgerows, which contribute to soil health, water management and landscape quality, as well as supporting wildlife. **CP22** also provides an important strategic role by limiting inappropriate development and maintaining openness, helping to protect wider landscape structure and green infrastructure continuity.
- 9.1.92 Long-term management is another important feature of the Plan. **CP70** and **CP71** require clear arrangements for maintaining green infrastructure over time, including funding and responsibility for upkeep. This helps ensure that green spaces continue to function properly and deliver benefits in the future, rather than declining after they are first created. **CP24** and **CP25** also supports this approach by requiring comprehensive

masterplanning in their respective Special Policy Areas, along with **CP69** which requires masterplans for major developments.

- 9.1.93 The link between green infrastructure and people's health and wellbeing is also clearly recognised. **CP68** promotes access to green space and opportunities for recreation, highlighting the role that natural environments play in supporting both physical and mental health. This reinforces the idea that green infrastructure is a key part of creating healthy and liveable places. This is further complemented by **CP61**, which protects areas of particular importance to local communities, ensuring continued access to valued green spaces as part of the wider network.

Table 9-6: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Enhanced green and blue infrastructure networks.	Direct, long-term, positive.	None proposed.
Improved natural capital and ecosystem services.	Direct and indirect, long-term, positive.	None proposed.
Increased access to green spaces and recreational opportunities.	Direct, long-term, positive.	None proposed.
Improved connectivity between green infrastructure assets.	Direct, long-term, positive.	None proposed.
Long-term enhancement and management of green infrastructure resources.	Direct, long-term, positive.	None proposed.

Healthy and vital communities

Commentary on the spatial strategy

- 9.1.94 The spatial strategy has a direct influence on how communities develop and function across the district, particularly in terms of access to services, opportunities for everyday activity and overall quality of life. By shaping where growth takes place, it affects how easily people can meet their daily needs and how connected communities are.
- 9.1.95 The focus on directing development to Principal and Non-Principal Settlements (**CP4**) helps ensure that a large proportion of new housing is located in places where services and facilities are already available. This supports more convenient access to healthcare, education, shops and employment, and creates better conditions for walking and cycling as part of everyday life. Concentrating growth in these areas also increases the likelihood that services remain viable and can expand to meet future demand.
- 9.1.96 The proposed use of strategic allocations (**CP2**) introduces opportunities to shape new communities in a more coordinated way. Larger sites, including urban extensions and the proposed new settlement, are capable of

accommodating open space, community facilities and supporting infrastructure within their design. Where these elements are delivered alongside housing, they can create environments that support both physical activity and social interaction. However, the scale of growth proposed at some strategic locations will represent a substantial increase relative to the size of existing communities, such as Moreton-in-Marsh, Mickleton, Kemble, and Down Ampney. Whilst this creates opportunities to secure new services, facilities and infrastructure, it also highlights the importance of ensuring that supporting infrastructure is delivered in step with development and that new growth is successfully integrated with existing communities.

- 9.1.97 The proposed new settlement at Driffield (**CP2 and CP12**) offers the chance to establish a new community with its own services and facilities, both within the current plan period and extending beyond the plan period, which could reduce reliance on other settlements.
- 9.1.98 Smaller sites delivered through **CP3** play a more modest but still relevant role. By bringing development to a range of villages, the strategy helps to support population levels and maintain local facilities where they exist. This can be particularly important in rural areas, although in locations with limited services, residents may still need to travel further for day-to-day needs, which can affect overall accessibility.
- 9.1.99 Infrastructure provision under **CP6** is closely linked to these outcomes. The availability of community facilities, open space and transport connections will influence whether new development supports healthy and well-connected communities.

Commentary on the plan as a whole

- 9.1.100 The Plan sets out a comprehensive framework for supporting healthy and vital communities, drawing together policies relating to health and wellbeing, housing, infrastructure, movement, green infrastructure and design. Taken together, these policies promote environments that support physical health, mental wellbeing, social interaction and access to services, while seeking to ensure that communities are well-served and sustainable over the long term.
- 9.1.101 A central component of the Plan's approach is **CP68**, which explicitly requires development to demonstrate how it will reduce health inequalities, promote healthier lifestyles and support wellbeing. The requirement for Health Impact Assessments (HIAs) on larger developments provides a clear mechanism to assess how proposals respond to local health needs and address inequalities. The policy also promotes access to green space, opportunities for physical activity, and the provision of community infrastructure, all of which are directly linked to improved health outcomes.
- 9.1.102 **CP52** further supports healthy and vital communities by requiring the provision of new local centres within the strategic allocations. These

centres are expected to provide a range of services and facilities, including convenience retail, community uses and, where appropriate, health services, childcare provision and flexible workspace. The policy therefore supports the creation of more self-contained communities and improves access to everyday services within walking and cycling distance of new homes.

- 9.1.103 This approach is supported by a strong emphasis on active and sustainable travel, which plays a key role in supporting healthy lifestyles. **CP33** prioritises walking, cycling and public transport, while **CP35** requires development to be planned around safe and accessible active travel networks. These policies are reinforced by **CP34** and **CP37**, which seek to ensure that development is well connected to services and reduces reliance on private vehicles. **CP38 and 39** further support this approach by prioritising cycle infrastructure, accessible parking and provision for low emission transport, helping to create more inclusive and healthier movement environments.
- 9.1.104 Design is also a key factor in shaping healthy communities. **CP36, CP69, and 69a** require development to create safe, inclusive and high-quality environments, with a clear emphasis on public spaces, accessibility, social interaction and long-term adaptability. These policies encourage layouts that support active lifestyles, community cohesion and a sense of place, all of which contribute to wellbeing.
- 9.1.105 The Plan also places significant emphasis on green and blue infrastructure. **CP70** requires development to incorporate accessible and multifunctional green spaces, while **CP71** ensures that such spaces are properly managed and maintained over the long term. These policies support access to natural environments, recreation and biodiversity, which are closely linked to both physical and mental health. Additional support is provided through **CP1**, which promotes green infrastructure and connected open spaces. This is further supported by **CP61**, which protects areas of particular importance to local communities, helping to ensure continued access to valued open spaces.
- 9.1.106 Access to services and community facilities is addressed through **CP6** and **CP72**. These policies require development to provide or contribute to infrastructure such as community facilities, open spaces and services, ensuring that population growth is supported by appropriate provision. **CP72** also includes safeguards to prevent unnecessary loss of community facilities, helping to maintain social networks and community cohesion.
- 9.1.107 **CP8** and **CP20** support the delivery of significant new education infrastructure, including new primary and secondary schools at Cirencester, Moreton-in-Marsh and Mickleton. This will help ensure that community infrastructure keeps pace with planned growth, improve access to education for existing and future residents, and contribute to the creation of sustainable and well-served communities.

- 9.1.108 Housing provision also plays an important role in supporting healthy and vital communities. **CP41** requires a mix of dwelling types and includes provisions for accessible and adaptable homes, while **CP42** ensures that housing is delivered to meet identified needs, particularly for those unable to access market housing. **CP44** and **CP45** support the needs of specific groups, contributing to more inclusive communities. **DP2** also supports locally-driven housing solutions, helping to strengthen community cohesion and deliver housing that reflects local needs. **CP50**, plays an important role in managing the impacts of tourism on local communities. These policies seek to ensure that housing is not lost to short-term or holiday use where it would undermine the availability of homes for permanent residents, helping to maintain balanced and sustainable communities.
- 9.1.109 The Plan also supports the role of centres and local environments in community life. **CP10** and **CP51** promote mixed-use development and accessible services, supporting vibrant centres that provide opportunities for social interaction, services and leisure. Similarly, policies such as **CP16** and **CP17** support improved access to recreational spaces, while **CP18** and **CP61** promotes outdoor recreation and access to the natural environment, respectively. **CP23** also safeguards opportunities for improved connectivity, which may enhance access to services and support community interaction over time. In addition, **CP53 to 59** relating to the historic environment contribute to the character, identity and distinctiveness of places, which are important to community wellbeing and sense of place.
- 9.1.110 The provision of infrastructure and connectivity also underpins the delivery of healthy communities. **CP8, CP13, and CP20** support the delivery of strategic infrastructure, whilst **CP9, CP14, and CP21** safeguard land required for future infrastructure schemes. These are complemented by **CP73** which supports digital connectivity, improving access to services, employment and social networks. **CP63 and 64** also contribute by ensuring that development is resilient to flooding and water-related risks, helping to protect communities and maintain safe living conditions over the long term. **CP31** further supports community resilience by encouraging locally-led initiatives that can deliver social and community benefits alongside energy generation.
- 9.1.111 **CP74** provides a mechanism to track delivery and respond where objectives are not being met, helping to ensure that communities remain well-served over time.

Table 9-7: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Improved access to services, facilities and community infrastructure.	Direct, long-term, positive.	None proposed.

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Support for healthier lifestyles through active travel and access to green space.	Direct and indirect, long-term, positive.	None proposed.
Increased delivery of inclusive and accessible housing.	Direct, long-term, positive.	None proposed.
Enhanced community cohesion and social wellbeing.	Direct and indirect, long-term, positive.	None proposed.
Creation of healthy, attractive and well-connected places.	Direct, long-term, positive.	None proposed.

Historic environment

Commentary on the spatial strategy

- 9.1.112 The spatial strategy has a strong influence on how the historic environment is experienced, protected and managed across the district, particularly given the high concentration of heritage assets, including conservation areas, listed buildings and historic landscapes.
- 9.1.113 An important part of the strategy is the concentration of growth within Principal and Non-Principal Settlements (**CP4**). Many of these settlements have well-defined historic cores. This is reflected in the site assessment evidence, which identifies that 27 allocations are located within 500 m of a conservation area and nine allocations are located within or directly adjacent to a conservation area. Development in these locations has the potential to affect the significance, character and setting of heritage assets through changes to townscape, key views and settlement form.
- 9.1.114 In addition to conservation areas, heritage sensitivities associated with designated assets are also widespread across the allocations. In particular:
- five allocations are located within 500 m of a Grade I listed building;
 - nine allocations are located within 500 m of a Grade II* listed building;
 - 32 allocations are located within 500 m of a Grade II listed building; and
 - 14 allocations are located within 500 m of a Scheduled Monument, including the strategic allocations at Steadings Southern Extension, Moreton-in-Marsh, and Down Ampney.
- 9.1.115 Potential effects relate principally to changes in the setting of heritage assets, impacts on the historic relationship between settlements and their surrounding landscapes, and effects on archaeological remains. One allocation, Steadings Southern Extension, contains the Settlement South East of Chesterton Farm Scheduled Monument within its development boundary. Whilst this represents a notable heritage sensitivity, the concept framework specifically seeks to conserve and enhance the setting of the

Scheduled Monument through the use of green infrastructure, open space and landscape-led design measures, helping to ensure that the monument remains a key feature within the wider site.

- 9.1.116 The proposed use of strategic allocations (**CP2**), particularly urban extensions, introduces both risks and opportunities for the historic environment. Large-scale development on the edges of settlements can affect the setting of historic towns and villages, including important views and the relationship between built form and surrounding countryside. However, the concept frameworks demonstrate that heritage considerations have informed the design of the strategic allocations. For example, the Cirencester South East and Steadings Southern Extension allocations incorporate substantial green infrastructure buffers and areas of open space to manage the transition between new development and the historic settlement edge. At Fairford and Down Ampney, the concept frameworks seek to respect the historic settlement pattern through the retention of landscape buffers and green corridors, whilst the Kemble allocation incorporates green infrastructure and landscape-led design measures intended to protect the setting of nearby heritage assets and maintain settlement identity. Similarly, the Moreton-in-Marsh framework incorporates strategic open space and landscape buffers which help to safeguard the setting of the historic market town and nearby heritage assets.
- 9.1.117 Smaller sites brought forward through **CP3** are less likely to result in large-scale change individually, but their cumulative impact is relevant. Development within or adjacent to smaller settlements, many of which have historic character, may lead to incremental change over time, particularly where sites are closely related to conservation areas or historic edges. These effects are typically more localised but can gradually alter the character of settlements if not well managed. Several non-strategic allocations are located within or adjacent to conservation areas and in proximity to listed buildings. The accompanying development templates identify these sensitivities and include requirements relating to heritage-led design, the protection of key views, archaeological investigation where necessary, landscaping measures and the conservation of heritage asset settings.
- 9.1.118 The role of the area strategies (**CP7, 12 and 19**) in aligning housing, employment and infrastructure supports a more coordinated approach to development, which can help in managing impacts on the historic environment. The coordinated delivery of growth also presents opportunities to secure strategic landscape and green infrastructure measures that help maintain the setting of historic settlements and heritage assets.
- 9.1.119 The spatial strategy recognises the constraints posed by the historic environment, particularly through the environmental capacity considerations within **CP4**, which allow for adjustments where development would cause

unacceptable harm. This provides an important safeguard, helping to direct growth away from the most sensitive areas where necessary.

Commentary on the plan as a whole

- 9.1.120 The Plan provides a robust framework for the conservation and enhancement of the historic environment, supported by a combination of dedicated heritage policies and cross-cutting design, regeneration and infrastructure policies. These collectively seek to ensure that development respects, protects and where possible enhances heritage assets and their settings, while enabling appropriate and sensitive change.
- 9.1.121 The primary policy framework for heritage protection is set out in **CP53** to **CP59**, which aligns closely with national policy. **CP53** establishes an overarching approach to the historic environment, requiring development to conserve heritage assets and their settings in a manner proportionate to their significance. Great weight is given to conservation, with harm only permitted where there is a clear and convincing justification and where any public benefits outweigh that harm. This establishes a strong protective framework, particularly for assets of the highest significance.
- 9.1.122 The policy framework also includes specific safeguards for different heritage asset types. **CP54** provides detailed protection for listed buildings and their settings, requiring proposals to preserve architectural and historic significance, retain important features and ensure that alterations, extensions and changes of use sustain the significance of the asset. The policy also supports the sensitive retrofitting of listed buildings where this can be achieved without unacceptable harm. **CP55** and **CP56** similarly require development affecting Conservation Areas and non-designated heritage assets to preserve or enhance their significance, character and appearance, ensuring that locally distinctive historic places and features are appropriately considered and protected. In addition, **CP58** provides protection for Registered Parks and Gardens, requiring development to conserve their significance, landscape setting and important views.
- 9.1.123 **CP57** further strengthens the heritage framework by requiring archaeological assessment and, where necessary, field evaluation where development may affect archaeological assets. The policy establishes a strong presumption in favour of preserving scheduled monuments and other important archaeological remains in situ, helping to protect features of archaeological significance across the district.
- 9.1.124 The Plan also positively supports the re-use and long-term conservation of heritage assets. **CP59** encourages the sensitive conversion of historic buildings where this would secure their future, while ensuring that their significance is sustained. This approach is reinforced by **CP26**, which supports the sensitive retrofitting of traditional buildings, provided that their significance is not harmed. This is further complemented by **DP7**, which

supports the reuse of existing rural buildings in a way that respects their character and setting, helping to secure their long-term viability.

- 9.1.125 Beyond the core heritage policies, the Plan integrates the historic environment into place-making and regeneration strategies. For example, **CP10** promotes development that is sensitive to the character and spatial qualities of the historic town centre, including references to the Roman Wall and urban grain. Similarly, **CP11** requires development to respect the parkland character and built heritage of the site, while **CP24** includes requirements to enhance the setting of key sites. **CP51** also contributes by requiring development to enhance the character and heritage of centres, supporting their continued vitality while safeguarding historic significance. These policies demonstrate a commitment to using heritage as a driver for high-quality place-making.
- 9.1.126 Historic transport and cultural assets are also recognised. **CP16** and **CP23** require development to respect, improve and enhance historic routes and associated features, safeguarding their cultural and historic value. These policies support the preservation of historic infrastructure while enabling appropriate use and access. **CP22** also contributes indirectly by maintaining openness and preventing inappropriate development in areas where the historic landscape setting of settlements and heritage assets is particularly sensitive. This is further reinforced by **CP62**, which requires development to conserve landscape character, important views and the setting of natural and built landmark features. This is particularly important in the Cotswolds, where the historic environment is closely tied to landscape character, and helps ensure that the wider setting and historic landscape context of heritage assets are appropriately protected.
- 9.1.127 Design policies further reinforce heritage protection. **CP69** requires proposals to respond to context, local history and cultural identity, ensuring that new development is informed by its historic surroundings. The requirement for masterplanning, design codes and design review for major development and strategic allocations, through **CP69a**, provides additional safeguards to ensure that heritage considerations are addressed from the earliest stages. **CP73** also includes safeguards to minimise impacts on heritage assets and their settings, ensuring that modern infrastructure is carefully integrated within historic environments.

Table 9-8: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Conservation and enhancement of heritage assets and their settings.	Direct, long-term, positive.	None proposed.
Protection of the character and appearance of historic settlements.	Direct and indirect, long-term, positive.	None proposed.
Heritage-led design and place-making.	Direct, long-term, positive.	None proposed.

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Potential effects on the setting and significance of heritage assets from new development.	Direct and indirect, long-term, negative.	Mitigation provided through Plan policies and site-specific requirements.

Housing

Commentary on the spatial strategy

- 9.1.128 The spatial strategy provides the overall framework for how housing growth will be delivered across the district, setting out both the scale of provision and its geographical distribution. It establishes a clear approach based on a combination of strategic allocations, smaller sites and windfall development, which together meet housing needs.
- 9.1.129 A clear strength of the strategy is that it plans not only to meet but to exceed the identified housing requirement by incorporating an approximate 5% buffer above LHN (**CP2**), allowing for flexibility and contingency over the plan period. This reduces the risk of under-delivery and helps ensure that housing needs can be met even where some sites come forward more slowly than expected (i.e., due to the longer lead in times associated with strategic allocations). It also supports a stable supply of land, which is important for maintaining delivery over the long term.
- 9.1.130 The overall distribution of housing is guided by the settlement hierarchy (**CP4**), which directs most growth towards Principal and Non-Principal Settlements as these settlements are better served by infrastructure, services and employment opportunities. In particular, significant proportions of the district's housing growth are directed to Cirencester, Driffield, Moreton-in-Marsh, Fairford, Kemble and Mickleton through the strategic allocations, alongside smaller allocations within a range of Principal and Non-Principal Settlements.
- 9.1.131 The proposed use of strategic allocations (**CP2**) forms the backbone of housing supply, delivering a large proportion of new homes through a relatively small number of sites. The largest allocations are focused at Driffield, Moreton-in-Marsh, Cirencester, Fairford, Kemble and Mickleton, allowing for a more planned and coordinated form of growth where infrastructure, community facilities and environmental mitigation can be considered comprehensively. Strategic sites also provide opportunities for longer-term delivery, including future growth beyond the plan period, which supports continuity in housing supply.
- 9.1.132 The strategy also seeks to address identified Gypsy and Traveller accommodation needs through **CP45**. The Council's assessment of the strategic allocations concluded that only the strategic allocations at Steadings Southern Extension and Driffield could reasonably accommodate Gypsy and Traveller provision during the plan period whilst also retaining

sufficient capacity to support ongoing housing delivery beyond the plan period. The inclusion of Gypsy and Traveller pitches within these larger strategic allocations therefore supports the delivery of identified accommodation needs alongside wider housing growth, helping to promote inclusive and mixed communities.

- 9.1.133 Alongside this, non-strategic allocations (**CP3**) play a complementary role by providing smaller-scale development opportunities across a wider range of settlements. This helps to maintain a spread of housing development across the district, which can support rural communities and local services. It also introduces flexibility, allowing housing delivery to come forward from a variety of sources rather than relying solely on large sites.
- 9.1.134 The spatial strategy is further supported by the area-based strategies (**CP7, 12 and 19**), which set out how housing growth will be delivered in different parts of the district. These strategies align housing with employment and infrastructure, helping to ensure that development is better coordinated and more balanced. The requirement for infrastructure delivery (**CP6**) is an important part of the strategy, as it seeks to ensure that housing growth is supported by the necessary facilities and services. This is critical to making housing developments successful and sustainable.

Commentary on the plan as a whole

- 9.1.135 The Plan provides a strong and comprehensive framework for housing provision, addressing the delivery of sufficient, high-quality, affordable and inclusive housing, supported by infrastructure and aligned with wider sustainability objectives.
- 9.1.136 A key strength of the Plan is its focus on meeting a wide range of housing needs. **CP41** requires development to provide an appropriate mix of dwelling sizes informed by evidence, alongside clear requirements for accessible and adaptable homes (M4(2)) and wheelchair user dwellings (M4(3)). This contributes to the delivery of housing that is suitable for older people and those with mobility impairments, supporting long-term adaptability of the housing stock.
- 9.1.137 **CP43** supports the delivery of self-build and custom-build housing through requirements on larger sites, helping to diversify housing supply and expand housing choice.
- 9.1.138 The Plan also supports specialist and supported housing provision through **CP44**, which addresses the needs of groups including older people, people with disabilities and those requiring care. The policy emphasises accessibility, integration with services and community connectivity, helping to ensure that housing contributes to inclusive and balanced communities. **CP45** further strengthens this approach by identifying sites and setting out a clear framework for meeting the accommodation needs of Traveller communities, ensuring that provision is planned and delivered in a structured and sustainable way.

- 9.1.139 The provision of affordable housing is a central component of the housing framework. **CP42** requires a substantial proportion of new development to deliver affordable housing, with a strong emphasis on rented tenures, reflecting identified needs. This is supported by **DP1** and **DP2**, which provide additional delivery mechanisms, particularly in rural areas. Together, these policies are likely to make a significant contribution to improving housing affordability and access across the district.
- 9.1.140 The Plan also includes targeted measures to help maintain a sustainable supply and balance of housing through **CP50**, which includes safeguards to prevent the loss of existing dwellings to visitor accommodation where it would undermine housing supply, and by **CP49**, which requires proposals to be compatible with local communities and environmental constraints. Together, these policies help to manage the pressures of tourism on housing availability.
- 9.1.141 Housing provision in rural areas is further supported through **DP3**, which enables housing where there is an essential need linked to rural enterprises, while maintaining appropriate controls. **DP4** ensures that existing restrictions are only lifted where justified, helping to protect housing intended to meet specific local needs. **DP5** also contributes by allowing the renewal of housing stock where appropriate, ensuring that replacement homes remain proportionate in scale and location, supporting the maintenance and improvement of existing dwellings without resulting in unsustainable expansion.
- 9.1.142 The Plan also promotes high-quality and sustainable housing development. **CP1** requires housing proposals to incorporate measures relating to energy efficiency, climate resilience, sustainable construction and green infrastructure, contributing to improved living conditions and long-term sustainability. This is complemented by provisions encouraging access to active travel and green space.
- 9.1.143 Delivery of housing is closely linked to infrastructure provision. **CP6** ensures that new housing is supported by the necessary social, physical and service infrastructure, helping to create sustainable and well-functioning communities. Similarly, **CP8**, **CP13** and **CP20** support the delivery of strategic infrastructure required to underpin housing growth, whilst **CP9**, **CP14** and **CP21** safeguard land required for future infrastructure schemes. The Plan also supports the integration of housing within mixed-use and regeneration contexts.

Table 9-9: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Meeting housing needs across the district.	Direct, long-term, positive.	None proposed.

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Increased provision of affordable housing.	Direct, long-term, positive.	None proposed.
Increased provision of accessible and specialist housing.	Direct, long-term, positive.	None proposed.
Improved housing choice and tenure mix.	Direct, long-term, positive.	None proposed.
Improved housing supply to meet identified needs.	Direct, long-term, positive.	None proposed.

Landscape

Commentary on the spatial strategy

- 9.1.144 The spatial strategy has a direct influence on the character and appearance of the district's landscapes, particularly through the scale and location of development and how it is distributed between settlements and the countryside. As the Cotswolds National Landscape covers approximately 80% of the district, and given the designation of Special Landscape Areas locally, these considerations have been a key factor in shaping the spatial strategy for the Plan.
- 9.1.145 The approach to growth reflects the need to balance development requirements with the protection of valued landscapes. In this regard, the focus for strategic-scale growth has been on sites located outside of the Cotswolds National Landscape, reflecting national policy which affords the highest level of protection to nationally designated landscapes. For non-strategic allocations, the focus has similarly been on directing growth towards Principal and Non-Principal Settlements located outside of the National Landscape where possible. However, it is recognised that communities within the National Landscape also require opportunities for growth to support their vitality and long-term sustainability. As a result, development within the National Landscape has generally been directed towards locations identified through the Council's Landscape Sensitivity Assessment as being capable of accommodating development, taking account of landscape sensitivity and opportunities for mitigation. In some cases, allocations have also been supported by wider planning considerations, including community infrastructure benefits and settlement sustainability considerations.
- 9.1.146 This approach is reflected in the allocation strategy, although landscape designations and sensitivities remain a notable consideration across a number of allocations. In particular:
- 16 non-strategic allocations are located within the Cotswolds National Landscape;

- a further 14 allocations are located within 2 km of the Cotswolds National Landscape, comprising seven strategic allocations and eight non-strategic allocations; and
- 18 allocations overlap with a Special Landscape Area, comprising two strategic allocations and 16 non-strategic allocations.

9.1.147 Development in these locations has the potential to affect landscape character, settlement setting, important views and the relationship between settlements and the surrounding countryside, increasing the importance of careful site design and landscape mitigation.

9.1.148 The Landscape Sensitivity Assessment also demonstrates several of the allocations are located within landscapes of medium-high or high sensitivity, including strategic allocations at Driffield, Fairford, and Kemble (see the Landscape Sensitivity Assessment). In response, the concept frameworks incorporate measures such as structural planting, landscape buffers, green infrastructure corridors, retention of existing vegetation and the use of open space to soften settlement edges and maintain key views. For example, the Steadings Southern Extension allocation incorporates substantial green infrastructure and open space along sensitive boundaries, whilst the Kemble and Fairford allocations utilise landscape-led design principles to assist integration with the surrounding landscape. At Moreton-in-Marsh and Mickleton, landscape buffers and strategic open space are incorporated to help protect settlement setting and reduce visual impacts. These measures should help to reduce potential adverse effects on landscape character and visual amenity.

9.1.149 The proposed new settlement at Driffield (**CP2** and **CP12**) also represents a significant landscape change. As a new area of built development, it will inevitably alter the existing character of the landscape at a local scale. While there is scope to design the settlement in a way that responds to its surroundings, including through layout and landscape structure, it will still represent a substantial change to currently undeveloped land. However, the concept framework incorporates strategic green infrastructure corridors, open space networks and structural landscaping intended to help integrate the development into the surrounding landscape and maintain connectivity with existing landscape features.

9.1.150 Smaller sites delivered through **CP3** are less likely to result in major change individually, but their cumulative impact is important. Development across multiple villages and edge-of-settlement locations can gradually alter the pattern and form of settlements, particularly where development extends into open land or affects the distinction between settlements and the countryside. The accompanying development templates for the non-strategic sites identify landscape sensitivities and include requirements relating to landscape buffers, structural planting, protection of key views and context-sensitive design.

- 9.1.151 The spatial strategy does include an important safeguard through the environmental capacity approach within **CP4**, which allows for adjustments where development would result in unacceptable harm, including to landscape character. This provides a mechanism to take account of landscape sensitivity when distributing growth.

Commentary on the plan as a whole

- 9.1.152 The Plan is prepared within a highly sensitive landscape context, with much of the district falling within the Cotswolds National Landscape, placing significant emphasis on the need to conserve and enhance landscape character, scenic quality and sense of place. Overall, the Plan provides a strong framework for landscape protection and enhancement, although some policies supporting development introduce potential for localised adverse effects.
- 9.1.153 **CP62** provides a clear overarching framework, requiring development to conserve landscape character, important views, and the setting of natural and built features, including the historic significance of landscapes. The policy also requires development to respond to the Cotswold Landscape Character Assessment, protect settlement separation, avoid unacceptable visual intrusion into the countryside and, for major developments, be supported by Landscape and Visual Impact Assessments.
- 9.1.154 A key strength of the Plan is the way landscape considerations are embedded across multiple policies, rather than being addressed solely through **CP62** as single policy. For example, **CP22** explicitly requires development to conserve openness, landscape character and separation, while also recognising the area's designation within the National Landscape.
- 9.1.155 The Plan also includes clear safeguards for development within sensitive landscapes. **CP28** and **CP29** require proposals affecting the National Landscape to demonstrate that benefits outweigh harm, and direct development away from areas of high landscape sensitivity. Likewise, **CP30** proposes locating larger-scale solar schemes in areas of lower landscape sensitivity, helping to manage cumulative landscape effects.
- 9.1.156 The Plan supports landscape enhancement and restoration, particularly through policies relating to green infrastructure and environmental assets. **CP70** requires development to adopt a design-led approach, integrating landscape features such as trees, hedgerows, watercourses and habitats into proposals. It also promotes connectivity, biodiversity net gain and long-term management, all of which contribute to improved landscape quality and resilience. This is reinforced by **CP71**, which ensures the long-term stewardship of accessible green spaces. **CP60** further strengthens this by requiring protection and enhancement of habitats and ecological networks, recognising the essential role that biodiversity plays in defining landscape character and function. **DP10** further strengthens this approach by

protecting key landscape features and promoting new planting, which contributes to the conservation of landscape character and the delivery of wider environmental benefits.

- 9.1.157 Landscape character is also protected through rural development policies, which emphasise sensitive siting, design and integration with existing features. For example, **DP6** and **DP8** require proposals to integrate with existing buildings, avoid skyline locations and minimise visual impacts, while also protecting National Landscape character. Similarly, **DP9** requires schemes to demonstrate that they do not result in adverse cumulative landscape impacts. **DP11** also contributes by protecting the district's dark night skies, which form an important component of landscape character and tranquillity, particularly within rural areas and the Cotswolds National Landscape.
- 9.1.158 Policies focused on the reuse of existing buildings, such as **DP7** and **DP5**, also contribute positively by encouraging the reuse and adaptation of existing structures, thereby reducing the need for new built form in the countryside and helping to maintain landscape character.
- 9.1.159 In addition, the Plan recognises the importance of distinct landscape features and corridors. **CP16** and **CP23** require development to respect and enhance their historic and landscape character, while **CP18** supports after-uses that reinforce local landscape identity and sense of place. **CP17** also supports leisure and recreation uses where appropriate, which can enhance the function and value of river corridors within the landscape. **CP65** further supports this by requiring development to protect the form, function and setting of watercourses, including the provision of buffer zones and avoidance of culverting, helping to maintain their role as key landscape features and corridors. **CP61** contributes at a more local scale by protecting areas of particular importance to communities, helping to maintain the character and distinctiveness of settlements and their surroundings.
- 9.1.160 The relationship between landscape and the historic and built environment is also clearly recognised. **CP53 to 59** ensure that development conserves heritage assets and their settings, which are key components of the Cotswold landscape. Similarly, **CP51** and **CP10** contribute to the protection of townscape character, ensuring that development within settlements reflects local form, grain and historic context. Design policies such as **CP69 and 69a** further reinforce this by requiring development to respond to local character and identity, including both townscape and landscape considerations.
- 9.1.161 **CP72** supports the provision of open spaces and community facilities which form part of the wider townscape and local landscape structure, while **CP73** requires infrastructure to minimise visual impacts, helping to protect skylines, views and landscape character.

- 9.1.162 **CP74** provides a mechanism to track the effectiveness of the policy framework and respond where landscape objectives are not being achieved.

Table 9-10: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Protection and enhancement of landscape character through landscape-led design, green infrastructure and mitigation measures.	Direct, long-term, positive.	None proposed.
Potential landscape effects associated with development within and in proximity to the Cotswolds National Landscape and Special Landscape Areas.	Direct and indirect, long-term, negative.	Mitigation provided through Plan policies, concept frameworks and development templates.
Improved integration of development into the landscape through buffers, planting, open space and green infrastructure.	Direct, long-term, positive.	None proposed.

Land, soil and water resources

Commentary on the spatial strategy

- 9.1.163 The spatial strategy influences how land is used, soils are managed and water resources are affected, primarily through the location and scale of development. These effects are closely linked to the balance between concentrating growth and distributing it across the district.
- 9.1.164 Focusing development within Principal and Non-Principal Settlements (**CP4**) helps to make more efficient use of land, particularly where development takes place within or on the edge of existing built-up areas. This can reduce the need for more dispersed development across the countryside, which would otherwise lead to a greater overall loss of undeveloped land. At the same time, in light of the limited brownfield availability across the district, much of the planned growth is on greenfield sites, meaning that land take and soil loss is unavoidable.
- 9.1.165 The proposed delivery of strategic allocations (**CP2**) provides opportunities to plan development more carefully, including how land is used and how water is managed across a site. However, these locations will still involve the permanent loss of agricultural land and soil resources, particularly where sites are currently in active use. In this regard:
- 40 allocations overlap with Agricultural Land Classification (ALC) Grades 1-3 agricultural land, although this does not distinguish between Grade 3a (best and most versatile land) or Grade 3b land;

- 16 allocations are located within a Groundwater Source Protection Zone, including the strategic allocations at Down Ampney, Driffield, Kemble, Cirencester South East, Kingshill Lane, Fairford, Siddington, and Steadings Southern Extension;
 - six allocations are located within 500 m of a historic landfill site; and
 - three allocations are located within 250 m of a safeguarded waste site.
- 9.1.166 These constraints indicate the potential for adverse effects on agricultural land resources, soil quality and groundwater resources if development is not appropriately designed and managed.
- 9.1.167 The concept frameworks for the strategic and non-strategic allocations incorporate measures intended to respond to many of these constraints. For example, the strategic allocations at Driffield, Steadings Southern Extension, Fairford and Moreton-in-Marsh incorporate substantial areas of green infrastructure, sustainable drainage systems, strategic open space and multifunctional green space. Similarly, allocations located within Groundwater Source Protection Zones include requirements relating to sustainable drainage, surface water management and the protection of water quality. These measures should help to reduce risks to soil functions, improve water management and limit adverse effects on groundwater resources.
- 9.1.168 The role of infrastructure delivery (**CP6**) is also relevant, particularly in relation to water resources. Infrastructure such as drainage systems and utilities will influence how water is managed across the district. This is important given that many Principal and Non-Principal Settlements are within proximity to a main river or watercourse and areas of flood risk.

Commentary on the plan as a whole

- 9.1.169 The Plan provides a generally positive framework for the sustainable management of land, soil and water resources, within the constraints of the district. It achieves this by promoting efficient use of natural resources, protection of water environments and sustainable land management, while recognising the potential for some localised adverse effects associated with development pressures and inevitable loss of agricultural land.
- 9.1.170 A key strength of the Plan is the integration of resource efficiency and water management within climate policy. **CP1** explicitly requires development to promote the efficient use of natural resources, including water and soil, and to incorporate measures such as SuDS and water efficiency in buildings. This supports the sustainable management of water resources, helps to reduce runoff and flood risk, and contributes to the protection of soil structure and function. The inclusion of waste reduction and circular economy principles also promotes efficient land use and minimisation of resource consumption.

- 9.1.171 Water environments are further supported through policies relating to key watercourses and assets. **CP16** requires development to respect, enhance and restore the canal and its historic route, including its biodiversity and hydrological function. Similarly, **CP17** allows increased recreational use only where there is environmental capacity, implicitly recognising constraints relating to water quality and ecological sensitivity. **CP65** strengthens this approach by requiring development to protect the function, morphology and setting of watercourses, including buffer zones and avoidance of culverting, helping to maintain natural hydrological processes and water quality.
- 9.1.172 **CP18** provides a particularly positive approach to land and water resource management in former mineral extraction areas. It requires development to deliver biodiversity net gain, landscape enhancement and safe public access, while ensuring that proposals are consistent with approved restoration and aftercare schemes. This contributes to the beneficial after-use of previously disturbed land and supports long-term environmental enhancement.
- 9.1.173 The Plan also promotes the efficient use of land and materials, particularly through **CP26**, which encourages the reuse and retrofit of existing buildings rather than demolition and rebuild. This helps to reduce land take, minimise waste and limit the loss of embodied resources. The requirement to consider embodied carbon and the circular economy further supports more sustainable use of materials and land resources.
- 9.1.174 Agricultural land and rural resource management are addressed through **DP8**, which requires proposals to demonstrate a functional need, minimise environmental impacts and incorporate mitigation and enhancement measures such as retention of hedgerows and provision for wildlife. These provisions help protect soil quality, agricultural productivity and ecological functions. This is complemented by **CP60**, which promotes the protection of habitats and ecological networks that depend on healthy soil and water systems, and by **CP62**, which supports the conservation of natural landforms and soil-based landscape features.
- 9.1.175 A comprehensive framework for managing water resources is provided through **CP63 and CP64**. These policies require development to demonstrate adequate water supply and wastewater capacity, achieve high standards of water efficiency, protect water quality and incorporate SuDS. They also promote the use of natural flood management techniques and require a sequential approach to development in flood-prone areas. Together, these policies play a central role in managing water resources and reducing pressures on both surface and groundwater systems. **CP66** further supports this by preventing contamination of soil and water resources and requiring remediation where necessary.
- 9.1.176 **CP74** provides a mechanism to track environmental outcomes and respond where objectives relating to resource management are not being achieved.

Table 9-11: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Improved management of water resources through water efficiency measures, SuDS and water quality protections.	Direct, long-term, positive.	None proposed.
Protection and enhancement of groundwater and water environments.	Direct and indirect, long-term, positive.	None proposed.
Loss of agricultural land and soil resources through development.	Direct, permanent, negative.	Mitigation provided through Plan policies and site-specific requirements.
Increased pressure on water resources from planned growth.	Indirect, long-term, negative.	Mitigation provided through water efficiency and water management policies.

Transport and air quality

Commentary on the spatial strategy

- 9.1.177 The spatial strategy has a clear influence on travel patterns, levels of traffic and associated air quality, mainly through the location of development and how well it connects people to jobs, services and transport networks.
- 9.1.178 The focus on directing growth to Principal and Non-Principal Settlements (**CP4**) supports more efficient travel patterns. These locations are generally better served by facilities and, where available, public transport, making it more realistic for people to walk, cycle or use public transport for day-to-day journeys. Concentrating development in these areas reduces the need for longer-distance travel and can help limit increases in traffic and emissions.
- 9.1.179 The proposed strategic allocations (**CP2**) provide opportunities to plan movement in a more coordinated way. Larger sites can be designed with integrated walking and cycling routes, links to existing networks and provision for public transport, which may help to reduce reliance on private vehicles over time.
- 9.1.180 The spatial distribution of growth also provides opportunities to make use of the district's rail infrastructure. Settlements served by rail stations, including Moreton-in-Marsh and Kemble, along with Mickleton, which is in proximity of Honeybourne rail station, are a focus for planned growth over the Plan period. Collectively, this represents that around 36% of new allocations are proposed either within settlements served by rail infrastructure or in locations with reasonable access to rail services. The concept frameworks for the strategic allocations at Kemble, Moreton-in-Marsh and Mickleton include active travel links and connections to local

centres and transport infrastructure, which should help support more sustainable travel patterns and reduce reliance on private car use. Additionally, the delivery of a link road to the south and east of Moreton-in-Marsh will help to alleviate traffic through the town.

- 9.1.181 The distribution of development across smaller settlements through **CP3** contributes to dispersed growth. In these locations, access to services and public transport is often more limited, meaning that residents are more likely to rely on private vehicles for everyday travel. While the scale of individual sites is relatively small, their cumulative effect may increase traffic levels and have a localised impact on air quality.
- 9.1.182 The alignment of housing and employment growth within the area strategies (**CP7, 12 and 19**) helps to support more balanced communities, where some journeys can be made more locally.
- 9.1.183 The requirement for infrastructure delivery (**CP6**) is an important part of the strategy, as it provides a mechanism to deliver transport improvements alongside growth. This may include new routes, services or enhancements to existing infrastructure. At the same time, supporting growth may also involve investment in road infrastructure, which could reinforce car use if not balanced with sustainable transport measures.

Commentary on the plan as a whole

- 9.1.184 The Plan provides a strong and comprehensive framework to promote sustainable transport, reduce reliance on the private car and improve air quality, although the delivery of planned growth and associated infrastructure introduces potential for localised adverse effects.
- 9.1.185 A key strength of the Plan is the prioritisation of sustainable transport modes. **CP33** and **CP34** require development to prioritise walking, cycling and public transport, supported by integrated networks, improved infrastructure and contributions to sustainable travel measures. These are reinforced by **CP35**, which promotes the creation of safe, direct and attractive walking and cycling routes, including connections to schools and key services. Collectively, these policies provide a strong framework for encouraging modal shift away from the private car, with positive implications for reducing traffic congestion and improving air quality.
- 9.1.186 The Plan also places significant emphasis on public transport provision and accessibility. **CP37** requires development to incorporate viable and frequent public transport services, with clear accessibility standards (for example, proximity to stops and service levels). The requirement for mobility hubs, bus service enhancements and integrated shared transport options in **CP33** further supports a transition to more sustainable travel behaviours.
- 9.1.187 In addition, **CP39** and provisions within **CP1** promote the uptake of electric vehicles (EVs) and low-emission transport, including charging infrastructure

and support for alternative mobility options such as electric bikes. This is likely to contribute to improvements in local air quality over time, particularly in areas currently affected by vehicle emissions. **CP38** further supports this by prioritising cycle infrastructure, managing parking provision and promoting electric vehicle charging, which can influence travel behaviour and reduce reliance on private vehicles.

- 9.1.188 The Plan adopts a holistic and design-led approach to transport, integrating movement with place-making. **CP36** and **CP69** require development to create well-connected, safe and attractive environments that encourage active travel and reduce car dependency. **CP36** is particularly important in shaping how streets and public spaces function, requiring layouts that prioritise walking, cycling and inclusive movement, which can significantly influence travel behaviour and reduce reliance on private vehicles. **CP68** further strengthens this approach by promoting development that supports active lifestyles and reduces health inequalities, linking transport planning directly to air quality and health outcomes.
- 9.1.189 **CP66** complements this approach by requiring development to avoid unacceptable risks arising from pollution, contaminated land, noise, vibration, dust, odour and impacts on air, land and water resources. The policy also requires investigation and remediation where contamination is present, helping to protect both environmental quality and human health.
- 9.1.190 Infrastructure delivery is also a key component. **CP6, 8, 13 and 20** support the delivery of strategic transport infrastructure, including cycle links, transport hubs, public transport improvements and new road infrastructure where required. These policies help ensure that transport capacity and connectivity are aligned with development, reducing the risk of unmanaged congestion and associated air quality issues. **CP9, CP14 and CP21** further supports this by protecting land required for future transport schemes, although the implementation of such infrastructure may result in localised increases in traffic and associated emissions depending on scheme design and function.
- 9.1.191 The Plan also supports the reuse and enhancement of existing transport corridors, such as through **CP23** and **CP16**, which can provide sustainable transport and recreational routes, further reducing reliance on car travel. **CP11** and other strategic site policies also require proposals to demonstrate sustainable access and connectivity, ensuring that major trip-generating uses are integrated with sustainable transport networks.
- 9.1.192 Despite these strengths, the scale of development proposed within the Plan will inevitably lead to increased traffic generation, particularly in rural areas or locations where public transport provision may be more limited. While policies seek to mitigate these impacts through transport assessments, travel plans and sustainable infrastructure, some increase in vehicle trips and associated emissions is likely, particularly in the short to medium term.

- 9.1.193 Strategic infrastructure policies also include provision for new and upgraded road infrastructure, which, while necessary to support growth, may encourage continued car use in some locations and potentially offset gains from sustainable transport measures. In addition, rural development policies may give rise to car-dependent travel patterns, reflecting the dispersed nature of some settlements. Development associated with certain uses, such as employment sites or aviation-related activities at **CP15**, may also contribute to increased traffic and emissions, although these effects are expected to be managed through transport and environmental policy requirements. Policies supporting employment development, such as **CP46**, may also influence travel patterns and trip generation, particularly where employment sites are located outside of the most accessible locations. However, the policy includes support for sustainable travel and working practices, which may help to mitigate associated transport and air quality impacts.
- 9.1.194 However, these adverse effects are clearly mitigated by the overarching policy framework, which requires a strong focus on mode shift, integrated transport planning, EV uptake and accessibility to sustainable travel options. **CP67** further reinforces this by requiring development to minimise air pollution and protect air quality, including through mitigation measures where deterioration may otherwise occur. The emphasis on early infrastructure provision, masterplanning and long-term monitoring (**CP74**) further supports effective implementation.

Table 9-12: Effects summary table

Likely significant effect	Effect dimensions	Recommendations / mitigation measures
Increased use of sustainable and active travel modes.	Direct, long-term, positive.	None proposed.
Improved accessibility to public transport and sustainable transport infrastructure.	Direct, long-term, positive.	None proposed.
Improved air quality through reduced reliance on private vehicles and increased uptake of low-emission transport.	Direct and indirect, long-term, mixed.	None proposed.
Increased traffic generation associated with planned growth, particularly in rural areas.	Direct, long-term, negative.	Mitigation provided through sustainable transport, accessibility and air quality policies.

Cumulative and in-combination effects

9.1.195 Cumulative and in-combination effects refer to the combined impacts of multiple policies, proposals, or developments:

- Cumulative effects arise when several policies or developments affect the same environmental receptor or issue over time; and
- In-combination effects occur when the Plan's impacts interact with those from other plans or projects, potentially leading to greater overall effects.

Cumulative Effects

9.1.196 The Plan introduces a number of allocations which have the potential to give rise to cumulative effects, particularly in relation to transport, landscape, biodiversity, water resources and settlement character.

9.1.197 Cumulative effects arise from the concentration of development within and around Cirencester. The presence of multiple strategic allocations and associated infrastructure proposals within the same broad area has the potential to result in combined pressures on local transport networks, increased demand on water and wastewater infrastructure, and incremental changes to landscape and townscape character.

9.1.198 Cumulative effects may also occur in settlements that have already experienced recent growth, such as Moreton-in-Marsh. Additional allocations, when considered alongside existing planning commitments and recent development patterns, may lead to further incremental changes in settlement form, increased traffic levels and additional pressure on local infrastructure. Over time, this may result in more noticeable changes to character and environmental conditions.

9.1.199 Longer-term growth trajectories represent a further source of cumulative effects. Strategic locations such as Driffield and The Steadings may act as focal points for development beyond the plan period, and while the Plan defines growth within a fixed timeframe, there remains the potential for continued expansion in these areas. This could result in gradual but substantial changes to landscape character, land use patterns and infrastructure demand over time.

9.1.200 The spatial distribution of development may also give rise to cumulative effects. In particular, the concentration of growth in settlements outside the Cotswolds National Landscape, while consistent with environmental constraints, may result in disproportionate expansion in certain locations. This has the potential to alter the scale, form and character of those settlements incrementally, particularly where growth significantly exceeds historic development patterns.

9.1.201 At a district-wide level, the overall scale of development proposed is likely to result in incremental loss of greenfield land, soil sealing and increased

pressure on water resources. While such effects may be limited at the individual site level, their cumulative impact over time may become more noticeable, particularly where multiple developments occur within the same landscape, catchment or infrastructure network.

In-Combination Effects

- 9.1.202 In-combination effects are likely to arise through the interaction of the CLP with neighbouring plans, cross-boundary development patterns and wider strategic systems, including transport and environmental networks.
- 9.1.203 A key in-combination issue relates to cross-boundary transport patterns. Growth in settlements such as Mickleton may interact with development in neighbouring authorities, including Honeybourne in Wychavon District, particularly in relation to access to rail services and shared transport infrastructure. The combined effect of development across administrative boundaries may result in increased traffic flows and associated air quality impacts along key routes, particularly where infrastructure serves a wider functional area.
- 9.1.204 In-combination effects may also arise in relation to ecological receptors, particularly Site of Special Scientific Interest (SSSIs) and other sensitive habitats. Where multiple allocations fall within Impact Risk Zones, such as around Fairford, the combined effects of development may include increased recreational pressure, habitat fragmentation or changes to hydrological conditions. These impacts may arise not only from development within the Plan area, but also from pressures generated by surrounding authorities and wider environmental systems.
- 9.1.205 There is also potential for interaction with wider infrastructure systems, particularly transport and water networks, which extend beyond the administrative boundary. Development proposed within the Plan may place additional demand on shared infrastructure, and this demand may combine with growth from neighbouring areas, resulting in pressures that are greater than those associated with the CLP alone.
- 9.1.206 At a broader strategic level, Local Government Reorganisation across Gloucestershire may also give rise to in-combination effects. Changes in governance structures, spatial planning responsibilities and infrastructure delivery mechanisms may influence how development is coordinated across the area. While the impact of this remains uncertain, there is potential for effects relating to the alignment of growth strategies, infrastructure provision and environmental management.

9.2. Summary of the appraisal findings

Biodiversity

- 9.2.1 The Plan is expected to have **positive effects for biodiversity** through the protection and enhancement of ecological assets, the delivery of biodiversity net gain, and the strengthening of green infrastructure and ecological networks. Whilst development has the potential to affect sensitive ecological receptors, the policy framework provides a robust basis for avoiding, reducing and mitigating adverse effects. Overall, the Plan is expected to support improved ecological resilience and nature recovery across the district.

Climate change adaptation

- 9.2.2 The Plan is expected to have **positive effects for climate change adaptation** through a strong framework of policies relating to flood risk, water management, sustainable drainage, climate-resilient design and green and blue infrastructure. Whilst a number of allocations are affected by climate-related constraints, including flood risk and groundwater flooding, the Plan incorporates a range of site-specific and policy-based measures intended to avoid, reduce and mitigate these risks. Overall, the Plan is expected to improve the resilience of communities, development and infrastructure to the effects of climate change over the long term.

Climate change mitigation

- 9.2.3 The Plan is expected to have **positive effects for climate change mitigation** through a comprehensive framework of policies promoting net zero carbon development, renewable and low carbon energy, sustainable transport and active travel. The spatial strategy supports this approach by directing growth towards the district's most sustainable settlements, including locations with access to the rail network, whilst strategic allocations incorporate measures designed to reduce reliance on private car travel. Overall, the Plan is expected to contribute to a long-term reduction in greenhouse gas emissions across the district.

Economy and employment

- 9.2.4 The Plan is expected to have **positive effects for economy and employment** through the delivery of employment land, support for key economic sectors, protection of existing employment sites and investment in infrastructure and connectivity. The spatial strategy aligns housing and employment growth across the district, helping to support sustainable economic development, improve access to jobs and strengthen local communities. Overall, the Plan is expected to support long-term economic growth, business resilience and employment opportunities across the district.

Equalities

- 9.2.5 The Plan is expected to have **positive effects for equalities** through a strong focus on inclusive design, accessibility, community infrastructure and the delivery of affordable, accessible and specialist housing. Policies relating to sustainable transport, access to services, digital connectivity and health and wellbeing further support equitable outcomes for different groups across the district. Overall, the Plan is expected to promote social inclusion and improve access to housing, services and opportunities for all residents, including those with protected characteristics.

Green infrastructure and natural capital

- 9.2.6 The Plan is expected to have **positive effects for green infrastructure and natural capital** through the protection, enhancement and long-term management of green and blue infrastructure assets. The strategic allocations, policy framework and supporting concept frameworks provide significant opportunities to strengthen green infrastructure networks, improve access to natural greenspace, deliver multifunctional environmental benefits and enhance ecosystem services. Overall, the Plan is expected to contribute positively to the quality, resilience and connectivity of the district's natural assets.

Healthy and vital communities

- 9.2.7 The Plan is expected to have **positive effects for healthy and vital communities** through the delivery of housing, infrastructure, community facilities and accessible green spaces in sustainable locations. A strong emphasis on inclusive design, active travel, health and wellbeing, and access to services will help support healthier lifestyles and community cohesion. Whilst some settlements will accommodate significant levels of growth relative to their existing size, the Plan seeks to ensure that development is supported by the timely delivery of infrastructure and community facilities. Overall, the Plan is expected to contribute to the creation of well-connected, inclusive and resilient communities across the district.

Historic environment

- 9.2.8 The Plan is expected to result in **mixed, but predominantly positive, effects on the historic environment**. Whilst a significant number of allocations are located in proximity to heritage assets, conservation areas and scheduled monuments, creating potential for adverse effects on their significance and setting, the Plan includes a robust framework of heritage, design and place-making policies alongside site-specific mitigation measures. These provide a strong basis for avoiding, reducing and mitigating adverse effects, whilst also creating opportunities for heritage-led regeneration and the long-term conservation of the district's historic environment.

Housing

- 9.2.9 The Plan is expected to have **positive effects for housing** through meeting LHN and providing a headroom which allows for flexibility and contingency over the plan period. This reduces the risk of under-delivery and helps ensure that housing needs can be met even where some sites come forward more slowly than expected (i.e., due to the longer lead in times associated with strategic allocations). It also supports a stable supply of land, which is important for maintaining delivery over the long term. More broadly, policy support for affordable housing, accessible and adaptable homes, specialist accommodation, and Gypsy and Traveller provision will help meet a diverse range of housing needs. Overall, the Plan is expected to improve housing choice, affordability and availability, contributing to the creation of sustainable and inclusive communities.

Landscape

- 9.2.10 The Plan is expected to result in **mixed effects for landscape**. Whilst the spatial strategy has sought to direct major growth away from the most sensitive landscapes where possible, a number of allocations are located within or in proximity to the Cotswolds National Landscape and Special Landscape Areas, and development will inevitably result in landscape change in some locations. However, the Plan incorporates a strong framework of landscape, design and green infrastructure policies, together with site-specific mitigation measures, which should help to conserve landscape character, protect important views and integrate development into its surroundings.

Land, soil and water resources

- 9.2.11 The Plan is expected to result in **mixed effects for land, soil and water resources**. Whilst it includes a strong framework for the sustainable management of water resources, water quality, drainage and resource efficiency, a significant proportion of development will take place on greenfield land, including land classified as Grades 1–3 agricultural land. Growth also has the potential to increase pressure on water resources and groundwater systems. However, the Plan incorporates comprehensive measures relating to water efficiency, sustainable drainage, groundwater protection and pollution prevention, which should help to avoid, reduce and mitigate adverse effects.

Transport and air quality

- 9.2.12 The Plan is expected to result in **mixed, but predominantly positive, effects on transport and air quality**. The spatial strategy directs growth towards the district's most sustainable settlements and incorporates opportunities to support active travel, public transport use and access to the rail network. Whilst planned growth will inevitably generate additional traffic and may increase reliance on private vehicles in some rural locations, the

Plan includes a comprehensive framework of policies promoting sustainable transport, modal shift, public transport, electric vehicle infrastructure and air quality improvement. Together, these measures should help to minimise adverse effects and support more sustainable travel patterns over the long term.

9.3. Recommendations at this stage of plan making

- 9.3.1 The IIA has not identified any significant issues which require amendments to the spatial strategy or policy framework at this stage of plan preparation. However, careful implementation of the Plan will be important, particularly in relation to landscape, heritage, biodiversity, transport and infrastructure delivery. The effectiveness of mitigation measures should therefore be monitored through the Plan's monitoring framework and reviewed where necessary.

Part 3: What are the next steps?

10. Plan Finalisation

10.1. Consultation on the Regulation 19 version of the Local Plan

- 10.1.1 The IIA has informed the preparation of the Regulation 19 Local Plan and the development of its spatial strategy, allocations and policy framework.
- 10.1.2 Consultation responses received on the Regulation 19 Local Plan and accompanying IIA Report will be reviewed by the Council and considered by plan makers tasked with finalising the Plan.

10.2. Submission, examination and adoption

- 10.2.1 Following the consultation period, the Council will consider the representations received and determine whether the Plan remains suitable for submission for independent examination. The Plan, together with the IIA Report and other supporting evidence, will then be submitted to the Secretary of State for independent examination.
- 10.2.2 During the examination process, the Inspector will consider the soundness and legal compliance of the Plan, taking account of representations received and the findings of the IIA. Where modifications are required, these will be subject to further consultation and, where necessary, additional appraisal before the Plan is adopted.

11. Monitoring

- 11.1.1 The Environmental Assessment of Plans and Programmes Regulations (2004) require the significant environmental effects of implementing the Plan to be monitored. Monitoring helps to identify any unforeseen adverse effects arising from implementation of the Plan and enables appropriate remedial action to be taken where necessary.
- 11.1.2 The Plan contains a comprehensive monitoring framework which includes a range of indicators relating to housing delivery, employment growth, biodiversity, climate change, infrastructure provision, heritage, transport and other sustainability objectives. The monitoring framework therefore provides an important mechanism for tracking many of the environmental, social and economic effects identified through this IIA.
- 11.1.3 In particular, monitoring should focus on the key sustainability issues identified through the appraisal process, including:
- delivery of housing and employment development;
 - provision of affordable housing and specialist accommodation;
 - biodiversity net gain and habitat enhancement;
 - delivery and long-term management of green infrastructure;
 - greenhouse gas emissions, renewable energy generation and net zero carbon development;
 - transport mode share, active travel uptake and air quality;
 - impacts on the historic environment;
 - impacts on the Cotswolds National Landscape and other valued landscapes;
 - flood risk, water quality and water resource management; and
 - provision of infrastructure, services and community facilities.
- 11.1.4 Particular attention should be given to monitoring potential adverse or mixed effects identified through the IIA, including landscape change associated with development within or close to the Cotswolds National Landscape, effects on heritage assets and their settings, the loss of agricultural land, pressures on water resources and the transport impacts associated with planned growth.
- 11.1.5 Where monitoring identifies significant unforeseen adverse effects, or where the Plan is not performing as anticipated, the Council should consider whether additional mitigation measures, policy interventions or a review of the Plan are required.

Appendix A : Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the IIA Report.

Table A-1 links the structure of this report to an interpretation of Schedule 2, whilst **Table A-2** explains this interpretation (N.B. this current report is an IIA Report, as opposed to an SA Report). **Table A-3** then presents a discussion of more how the information in this IIA Report reflects the requirements for the IIA Report.

Table A-1: Questions answered by this IIA Report, in-line with an interpretation of regulatory requirements

Questions answered	As per regulations... the IIA 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
<i>What's the IIA scope? (supported by the IIA Scoping Report)</i>	
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

Questions answered**As per regulations... the IIA Report must include...****Part 1**

What has plan-making / IIA 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 IIA 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 A-2: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>		
<i>The report must include...</i>	<i>The report must include...</i>		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) 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;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>	
(h) 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	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table A-3: Checklist of how and where (within this report) regulatory requirements are reflected

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA (or in this case, IIA) Report:	
• An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 1 and Chapter 2 presents this information.
• The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; • The environmental characteristics of areas likely to be significantly affected; • ... environmental problems which are relevant... areas of a particular environmental importance...;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'IIA framework', which is presented within Chapter 3, Appendix B and C. The IIA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal chapters as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
• 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 Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'IIA framework', which is presented within Chapter 3, Appendix B and C. Also, information on the SA scope is presented as part of appraisal work in Chapter 6 and 9. With regards to explaining "<i>how... considerations have been taken into account</i>", Chapter 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
• The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air,	Chapter 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Chapter 9 presents an appraisal of the

Regulatory requirement	Information presented in this report
climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Local Plan as a whole. All appraisal work naturally involved giving consideration to the IIA scope and the various effect characteristics.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Chapter 9 presents recommendations and flags potential elements that can be a focus of further work if required ahead of Local Plan finalisation.
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;	Chapter 4 and Chapter 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Chapter 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
... measures envisaged concerning monitoring;	Chapter 10 presents this information.
a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations:	
Authorities... 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...	This IIA Report is published alongside the Regulation 19 version of the Local Plan in order to inform the consultation and then subsequent plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	

Regulatory requirement	Information presented in this report
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This IIA Report will be taken into account when finalising the plan for publication (see Chapter 10).

Appendix B Scoping information review (baseline and policy update)

B.1 Updated baseline

The baseline information is presented under each IIA topic in **Table B.1** below and has been proportionately updated to reflect the scope of the plan and potential effects.

Table B.1 Baseline information

IIA topic area	Summary of the key messages arising from the baseline
Economy and Employment	• Reduction in the number of people of working age living within the district. • The perceived loss of employment land to residential-led development. • Businesses face skill and labour shortages due to the high cost of living in the area, the affordability of housing, and comparatively low median wages. • The district imports labour (leading to net in-migration) to support its growth and experiences problems recruiting suitably skilled staff. • Limited offer in terms of large modern office space due to historic buildings and high-quality natural environment. • Competitive disadvantage compared to larger surrounding towns such as Swindon, Cheltenham, Tewkesbury and Gloucester.
Tourism (linked to Economy and Employment)	• Limited range of public transport options to key destinations, with limited parking exacerbating traffic. • Poor road signage and road maintenance in some areas. • Concentration of tourism in honeypot destinations with little to offer younger people and families. • Balancing of needs between visitors and residents to avoid conflict and retain a sense of place. • Potential environmental damage e.g. erosion caused by increased visitor numbers.
Healthy and Vital Communities	• Review of the settlement hierarchy across the district in light of the proposed level of growth to deliver LHN and employment land requirements.

IIA topic area	Summary of the key messages arising from the baseline
Transport and Air Quality	• The district is a net importer of its workforce, although a significant number of commuter journeys go inside and outside of the district. • A high proportion of the district's residents travel to work as the driver of a car or van. A lower-than-average proportion of residents travel to work as a passenger in a car, on a bike, or by public transport. • A significantly higher than average proportion of the district's working population work at home. However, much of the district has limited internet access. • The proportion of the population that own three or four or more cars is higher than average. Transport pollution (i.e., nitrogen dioxide levels) continue to be at risk of exceeding the national air quality standard. • Rural inaccessibility and connectivity is a contributor to inequalities across the district. • The district has very few electric vehicle charging points.
Biodiversity	• Recreational pressure on international sites, and the decline in the condition of some nationally and locally important sites for biodiversity. • Small and isolated parcels of priority habitat that cause fragmentation of ecological networks. • Delivering net gains for nature through new development areas, aligning with targets and indicators within the Environment Improvement Plan (2025).
Green Infrastructure and Natural Capital	• The need for more natural open spaces and open spaces including cycle/pedestrian links, play spaces and natural open spaces. • Recent work for the update to the Green Infrastructure Strategy has highlighted that the district has a deficit of open spaces based the ANGSt Standards. • The natural environment provides multiple benefits for humans, but the benefits are not officially measured by loss or gain.
Climate Change	• The age and larger size of the district's existing housing stock is likely to be a contributing reason for it having higher than average domestic gas and electricity consumption and lower than average energy efficiency ratings. • The district's environment reduces its potential for strategic renewable energy interventions. • The district continues to be at risk from fluvial, surface and groundwater flooding.

IIA topic area	Summary of the key messages arising from the baseline
Historic Environment	• Preserving the historic character and distinctiveness of the district's settlements, given their rich heritage resource which is internationally renowned, and how most of the Principal and Non-Principal Settlements contain designated conservation areas and listed buildings.
Landscape	• 80% of Cotswold District is within the Cotswolds National Landscape, limiting opportunities for major development within this area. Growth will likely be concentrated outside of the National Landscape which may significantly alter character of settlements across the district due to their potential increases in size. • Special Landscape Areas (SLA) cover the district, incorporating areas within and outside of the National Landscape boundaries. The interplay between the built and natural environment will be an essential local consideration for new development areas, particularly in locations within the setting of SLA.
Land, Soil, and Water Resources	• Best and Most Versatile Land for agricultural purposes is prevalent across the district, with challenge for strategic scale growth likely to be delivered on greenfield land given limited brownfield site availability. • The district has several groundwater source protection zones. A large proportion of the district is also covered by Nitrate Vulnerable Zones. • Many of the Principal and Non-Principal Settlements across the district (i.e., locations where growth is likely to be directed) are within proximity to a main river or ordinary watercourse. • Cotswold is part of the 'SWOX', a Water Resource Zone in the Thames area, an area which is classed as '<i>seriously water stressed</i>'.

B.2 Updated policy context

The IIA must consider the relationships between the emerging Plan and other relevant plans, policies or strategies (PPS) and environmental objectives. The tables below show the key PPS which have informed plan making and the IIA.

Table B.2 PPS applicable for all IIA themes

Document Title	Year of Publication
International	
<u>SEA Directive [2001/42/EC]</u>	2001
National	
<u>Design and Placemaking Planning Practice Guidance: Consultation Document</u>	2026
<u>Environment Improvement Plan</u>	2025
<u>National Planning Policy Framework (NPPF) Consultation Draft</u>	2025
<u>Planning and Infrastructure Act</u>	2025
<u>National Planning Policy Framework (NPPF)</u>	2024
<u>Levelling-up and Regeneration Act</u>	2023
<u>Environment Act</u>	2021
<u>National Model Design Code</u>	2021
<u>National Design Guide</u>	2019
<u>Environmental Assessment of Plans and Programmes Regulations</u>	2004
<u>Planning and Compulsory Purchase Act</u>	2004
<u>Planning Practice Guidance</u>	various

B.3 Healthy and vital communities

Table B.3 PPS reviewed in relation to healthy and vital communities

Document Title	Year of Publication
International	
<u>Ambient Air Quality and Cleaner Air for Europe Directive [2008/50/EC]</u>	2008
National	
<u>10 Year Health Plan for England</u>	2025
<u>Streets for a Healthy Life: A companion guide to building for a Healthy Life</u>	2022

Document Title	Year of Publication
<u>Building for a Healthy Life</u>	2020
<u>Health Equity in England: The Marmot Review 10 Years On</u>	2020
<u>Health Impact Assessment in Spatial Planning</u>	2020
<u>Planning for Sport Guidance</u>	2019
<u>Healthy High Streets</u>	2018
<u>Spatial Planning for Health: An evidence resource for planning and designing healthier places</u>	2017

B.4 Housing

Table B.4 PPS reviewed in relation to housing

Document Title	Year of Publication
National	
<u>10-Year Infrastructure Strategy</u>	2025
<u>Planning Policy for Traveller Sites</u>	2023
<u>Homes England Strategic Plan 2023 to 2028</u>	2023
<u>Long-Term Plan for Housing</u>	2023
<u>The National Housing Federation's Vision for a Long-Term Housing Strategy</u>	2023

B.5 Economy and employment

Table B.5 PPS reviewed in relation to economy and employment

Document Title	Year of Publication
International	
<u>The Paris Agreement UNFCCC</u>	2015
<u>Waste Framework Directive</u>	2008
National	
<u>Spring Forecast 2026</u>	2026
<u>UK Infrastructure: A 10 Year Strategy</u>	2025
<u>Get Britain Working White Paper</u>	2024
<u>Invest 2035: UK Industrial Strategy Green Paper</u>	emerging

B.6 Equalities

Table B.6 PPS reviewed in relation to equalities

Document Title	Year of Publication
International	
<u>European Convention on Human Rights</u>	1950
<u>Convention on the Rights of Persons with Disabilities</u>	2006
National	
<u>Equality Act</u>	2010
<u>Human Rights Act</u>	1998

B.7 Transport and air quality

Table B.7 PPS reviewed in relation to transport and air quality

Document Title	Year of Publication
National	
<u>The Department for Transport's Third Cycling and Walking Investment Strategy</u>	2026
<u>Cycle Infrastructure Design</u>	2020
<u>The Transport Investment Strategy – Moving Britain Ahead</u>	2017
<u>Ambient Air Quality and Cleaner Air for Europe Directive [2008/50/EC]</u>	2008

B.8 Climate change mitigation

Table B.8 PPS reviewed in relation to climate change mitigation

Document Title	Year of Publication
International	
<u>The Paris Agreement UNFCCC</u>	2015
<u>Kyoto Protocol</u>	1997
National	
<u>The Seventh Carbon Budget</u>	2025
<u>Carbon Budget Delivery Plan</u>	2023
<u>UK Climate Change Risk Assessment</u>	2022
<u>Net Zero Strategy: Build Back Greener</u>	2021
<u>Heat Networks: Building a Market Framework</u>	2020

Document Title	Year of Publication
<u>Clean Growth Strategy</u>	2019
<u>The Road to Zero</u>	2018
<u>UK Climate Change Act</u>	2008

B.9 Climate change adaptation

Table B.9 PPS reviewed in relation to climate change adaptation

Document Title	Year of Publication
International	
<u>Biodiversity Strategy for 2030</u>	2020
<u>The Paris Agreement UNFCCC</u>	2015
<u>Water Framework Directive</u>	2000
National	
<u>UK (third) National Adaptation Programme 2023 to 2028</u>	2023
<u>UK Climate Change Risk Assessment</u>	2022
<u>National Flood and Coastal Erosion Risk Management Strategy</u>	2020
<u>How Local Authorities Can Reduce Emissions and Manage Climate Change Risk</u>	2012
<u>Flood and Water Management Act</u>	2010
<u>UK Climate Change Act</u>	2008

B.10 Historic environment

Table B.10 PPS reviewed in relation to historic environment

Document Title	Year of Publication
International	
<u>European Landscape Convention</u>	2000
<u>Convention on the Protection of the Archaeological Heritage of Europe</u>	1992
<u>World Heritage Convention</u>	1972
National	
<u>Historic England: Heritage and Climate Change</u>	2022
<u>Historic England Advice Note 11: Local Planning and the Historic Environment</u>	2022

Document Title	Year of Publication
<u>Historic England Advice Note 4: Tall Buildings Advice Note</u>	2022
<u>Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management</u>	2019
<u>Historic England Good Practice Advice: The Setting of Heritage Assets</u>	2017
<u>Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)</u>	2016
<u>Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans</u>	2015
<u>Ancient Monuments and Archaeological Areas Act 1979</u>	1979
<u>Planning (Listed Buildings and Conservation Areas) Act 1990</u>	1990
<u>Historic Buildings and Ancient Monuments Act</u>	1953

B.11 Landscape

Table B.11 PPS reviewed in relation to landscape

Document Title	Year of Publication
International	
<u>European Landscape Convention</u>	2000
National	
<u>Design and Placemaking PPG (consultation document)</u>	2026
<u>Management plans for Protected Landscapes in England</u>	2025
<u>Protected Landscapes Targets and Outcomes Framework</u>	2024

B.12 Green infrastructure and natural capital

Table B.12 PPS reviewed in relation to green infrastructure and natural capital

Document Title	Year of Publication
National	
<u>Design and Placemaking PPG (consultation document)</u>	2026
<u>National Model Design Code</u>	2021

B.13 Biodiversity

Table B.13 PPS reviewed in relation to biodiversity

Document Title	Year of Publication
International	
<u>Biodiversity Strategy for 2030</u>	2020
<u>The Paris Agreement UNFCCC</u>	2015
<u>Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services</u>	2012
<u>Birds Directive [2009/147/EC]</u>	2009
<u>Habitats Directive [92/43/EEC]</u>	1992
<u>Convention of Wetlands of International Importance Especially as Waterfowl Habitat (Ramsar Convention)</u>	1971
National	
<u>UK Biodiversity Framework</u>	2024
<u>Natural England Green Infrastructure Framework</u>	2023
<u>Biodiversity Net Gain Guidance</u>	2023
<u>Environment Act 2021</u>	2021
<u>Conservation of Habitats and Species (Amendment) (EU Exit) Regulations</u>	2019
<u>Conservation of Habitats and Species Regulations</u>	2017
<u>Wildlife and Countryside Act</u>	1981

B.14 Land, soil and water resources

Table B.14 PPS reviewed in relation to land, soil and water resources

Document Title	Year of Publication
International	
<u>Waste Framework Directive</u>	2008
<u>Water Framework Directive</u>	2000
National	
<u>Agriculture Act</u>	2020
<u>Safeguarding our Soils: A strategy for England</u>	2009
<u>National Framework for Water Resources</u>	2025
<u>Water Environment (Water Framework Directive) (England and Wales) Regulations.</u>	2017

Appendix C : Key sustainability issues and IIA framework

C.1 Key sustainability issues

The key sustainability issues are set out under each IIA topic in **Table C.1** below. These have been revised in light of the updated baseline and policy context for the district presented in **Appendix B**, and responses received from statutory bodies.

Table C.1 Key sustainability issues

IIA topic	Key sustainability issues
Healthy and Vital Communities	• An aging population needs good accessibility to services and facilities and suitable housing to enable them to live independently for longer and avoid social isolation. • With a lower than average economically active population, the district has to import a significant part of its workforce from elsewhere, increasing commuting journeys. • Fewer younger people reduces the viability of some services and facilities. • Services, facilities, employment opportunities and jobs are needed that are accessible to all sections of the community. • Living environment improvements are needed to improve the health of people in lower social and economic status groups. • Measures are needed to improve the district's health and wellbeing, such as promoting active travel and physical activity and to decrease car use and providing employment opportunities in traditional and emerging sectors.
Housing	• Household size – new housing developments need to meet the needs of the increasing number of smaller households. • House size - flats and terraced houses utilise less energy and they can be built in higher densities meaning that less land is required. • Significant over-delivery - continuing to deliver significantly more housing than is required is stressing the district's infrastructure. It inflates the calculation of future housing need and ultimately leads the district to a

IIA topic	Key sustainability issues
	position where it is no longer able to meet its housing needs, constraining its ability to deliver plan-led development. • Affordability – many younger people cannot afford to live in the district. People working in the district are often unable to live close to their jobs. These problems increase car journeys and social isolation. • Affordable housing - even 'affordable housing' can still be unaffordable to the people who need it because affordability relates to the market value of housing • Second home ownership - multiple home ownership reduces the amount of available housing stock that could otherwise contribute towards meeting the district's housing need.
Economy and Employment	• Very few locations in Cotswold District offer positive viability thresholds for new employment development. The district's established employment sites therefore play a critical role in meeting the district's economic and business needs. Protection of such sites and support for their potential intensification is needed to attract new businesses and ensure that existing businesses are retained and have the opportunity to grow. • An ageing population will have an impact on the economically active age group. This, combined with difficulties in attracting workers due to median wages below the national average; and the high cost of living and the affordability of housing is a key issue for the district. • Need for improved broadband connectivity, particularly in rural areas to support rural economy and reduce the need to travel. • Need to compete with larger surrounding towns such as Swindon, Cheltenham, Tewkesbury and Gloucester; and focus on its highly skilled workforce and attractive high-quality environment to live and work. • Ensuring that town centres retain their important role as community hubs through ensuring that they are resilient, flexible and adaptable to change.
Transport and Air Quality	• Poor accessibility leaves many people isolated from friends and family, key services, and their place of employment. • The district has a reliance on private car use. • Public transport is not currently a realistic alternative mode of transport in many parts of the district.

IIA topic	Key sustainability issues
	• Households owning numerous cars reinforces the reliance on accessing services and facilities by car. • The infrastructure is not currently in place to support electric vehicles and move away from fossil fuels. • Poor air quality is a risk to public health and has other environmental impacts.
Biodiversity	• Recreational pressures on Internationally Important Sites and other sites known for biodiversity interest. • Declining Biodiversity habitats and species globally, nationally and locally. • Fragmentation of habitats, small habitat pockets, lack of connectivity between sites and the limited ability to create new and larger sites for biodiversity. • Lack of understanding of key biodiversity issues at a development industry level. • Need to consider climate change adaptation and mitigation for biodiversity. • Biodiversity at a local level needs to take into consideration a specific site, but also how that site sits, and connects to other biodiversity features in the area.
Green Infrastructure and Natural Capital	• The need to further integrate the multifunctional benefits of GI and the role it has to play in addressing issues relating to climate change, the environment as a whole, as well as health and wellbeing. This includes the role GI has in contributing to healthier communities through the design of homes, their location and the grey and green infrastructure required to support them. • A key issue related to Green Infrastructure is the long-term management of public open spaces. As a result, the Council has been involved in the “Fairer management of public open space within residential developments” project. • Green infrastructure at a local level needs to take into consideration a specific site, but how that site also sits, and connects to other GI in the area. • Mapping natural capital enables a better understanding of its role and where it can be enhanced to deliver multiple benefits. • Natural capital mapping prepared by the Gloucestershire Local Nature Partnership provides useful information which is not currently referred to in the local plan. Underpins a number of policy areas.
Climate Change	• Climate change is likely to exacerbate health risks and inequalities associated with building overheating, indoor air pollution, flood damage, and water and biological contamination in the indoor environment.

IIA topic	Key sustainability issues
	Disruptions to daily life related to climate change can mean lost work and school days and may harm trade, transportation, agriculture, energy production, and tourism. Severe weather events can delay planting and harvesting, cause power outages, cause travel disruption, and otherwise make it difficult for people to go about their daily business, all of which will have an effect on the economy. • Parts of the district are more susceptible to the impacts of climate change, most notably areas with higher flood risk. • The reasons for the district's reducing carbon footprint are not understood and need to be investigated.
Historic Environment	• Ensuring that heritage assets are managed and maintained appropriately • How to manage change which protects and enhances the historic environment for future generations, while meeting the needs of current occupiers and users, for example the move from retail uses. • Using the historic environment as an "inspiration" for the design of new developments. • Relatively few non-ecclesiastical listed buildings are deemed to be at risk; however, it is still crucial that these are addressed (churches and scheduled monuments). • The need to consider the impacts of climate change on the historic environment. • Within the Council there is an increase in interest regarding how the historic environment can deliver on the climate change agenda.
Landscape	• The threats to the Cotswolds National Landscape and Special Landscape Areas associated with new development areas, climate change, and longer-term land management practices. • Finding the right balance between the need for more renewable energy provision and the existing landscape character. • Increased pressure on Public Rights of Way and National Trails as a result of tourism. • To ensure that development is designed and sensitively located to respect the Cotswold District's landscape and built heritage. • Making sure that the landscape is also valued for its multifunctional role including health and wellbeing as part of Green Infrastructure.

IIA topic	Key sustainability issues
Land, Soil, and Water Resources	• Best and Most Versatile Land for agricultural purposes is prevalent across the district, with challenge for strategic scale growth likely to be delivered on greenfield land given limited brownfield site availability. • Many of the Principal and Non-Principal Settlements across the district (i.e., locations where growth is likely to be directed) are within proximity to a main river or ordinary watercourse. • Increase in population growth may require infrastructure upgrades to enable development, to accommodate higher flows and/or to prevent a WFD deterioration • The development of each site could have an impact, particularly in relation to biodiversity and water quality, and where Good Ecological Status (GES) has not been reached. - run-off from increased development may worsen water quality. • Thames Water's (and other companies) ability to maintain a continuous supply to customer demands especially during hot, dry weather. • Increase in water demand adds pressure to existing supply infrastructures and upgrades will be required, combined with the uncertainty over the impact of climate change.

C.2 IIA Framework

Table C.2: IIA Framework

Topic	Objectives	Appraisal questions: Will the option / proposal help to...
 Biodiversity	• Protect and enhance biodiversity.	• protect and enhance semi-natural habitats, priority habitats and the habitats of priority species? • reduce habitat fragmentation and support nature networks and landscape scale enhancements? • provide net gain? • increase public awareness of biodiversity? • secure long-term management of biodiversity and sites? • protect and enhance features of geodiversity interest?
 Climate Change (adaptation)	• Ensure adaptability to climate change that, where feasible, goes beyond simple limitation of negative effects.	• reduce vulnerability to climate change impacts? • reduce flood risk, manage run-off sustainably and ensure the direct or indirect risk of flooding on site or downstream of the site is not increased by the development? • ensure that development takes place in accordance with the Strategic Flood Risk Assessment, Water Cycle Study and sequential test for flood risk, taking into account the likely effects of climate change?
 Climate Change (mitigation)	• Take an active role in achieving net zero carbon by 2050 if not before.	• encourage measures to reduce carbon emissions? • encourage / enable improvements to the energy efficiency of the district's existing building stock? • increase energy efficiency and reduce greenhouse gas emissions? • increase the generation and use of renewable energy? • address the negative impact of climate change, go beyond mitigation to achieve carbon neutral development?

Topic	Objectives	Appraisal questions: Will the option / proposal help to...
		• minimise the need to travel by unsustainable means? • adjust to future needs through being flexible and adaptive to the effects of climate change (heat, drought, extreme weather)? • ensure that development takes place in accordance with the Strategic Flood Risk Assessment, Water Cycle Study and sequential test for flood risk, taking into account the likely effects of climate change?
€ \$ £ ¥	Economy and Employment	• Achieve sustainable economic growth and opportunities for employment, including support for the rural economy. Support the resilience and vitality of town centres during transformation from the “traditional” retail-dominated high street to a more flexible and responsive model. • encourage the retention and / or growth of existing businesses? • provide accessible jobs? • provide live / work units and workspace for locally appropriate businesses? • provide sites for business and employment within communities? • encourage the use of local services and purchasing of local products? • ensure housing is delivered which can attract workers? • contribute to supporting the rural economy particularly through retaining or increasing the number of people employed in agriculture and tourism? • support the roll out of high-speed broadband? • contribute to a low carbon economy? • encourage larger businesses to locate in the district? • encourage a range of jobs and premises and in particular increase the number of people employed in emerging economic sectors? • support vitality and viability of existing town centres by helping them to be more flexible and responsive to change? • Encourage and support the development of sustainable tourism. • seek to avoid environmental damage e.g. erosion caused by increased visitor numbers? • support the visitor economy?

Topic	Objectives	Appraisal questions: Will the option / proposal help to...
	Equalities • Advance equality for all.	• Promote access for all including those with and without shared protected characteristics? • Provide opportunities to foster good relations between groups?
	Green Infrastructure and Natural Capital • Conserve and enhance green infrastructure assets and networks and exploit its multi-functional benefits.	• deliver the Council's GI Strategy? • maximise multiple benefits provided by GI? • link and enhance existing GI assets and networks?
	• Deliver natural capital and enhance the provision of ecosystem services.	• take a natural capital approach to growth by providing a strategic framework for delivery of growth to... – identify the most beneficial locations for tree planting? – assess how development projects can best contribute to natural capital locally? – identify blue / green infrastructure opportunities?
	Healthy and Vital Communities • Contribute to the achievement of balanced and healthy communities and be responsive to the needs of different age groups in the district.	• enable and encourage younger people to live and work in the district? • enable older people to live close to facilities, services and other people? • tackle social and functional isolation by making provision for interaction such as safe and accessible spaces, parks, community hubs? • provide essential community services and facilities including healthcare, Green Infrastructure and allotments? • enable "lifetime homes"? • increase physical activity, reduce obesity and improve mental health and wellbeing through the design and layout of schemes, provision of facilities for sport and recreation?

Topic	Objectives	Appraisal questions: Will the option / proposal help to...
	Historic Environment	• improve access to the countryside for recreation? • provide mixed use, mixed housing type and mixed tenure developments? • enable access to further education / training opportunities?
	• Deliver high quality and well-designed sustainable development that responds appropriately to its context.	• be sustainably and sympathetically designed having regard to its context? • respond appropriately to its context though being supported by a detailed characterisation study?
	Housing	• conserve and enhance the historic environment? • protect the historic settlement pattern and distinctive character of the towns and villages of the district? • ensure beneficial use and long-term management of heritage assets? • ensure that historic environment is used as a key driver and focus for inward investment regeneration and redevelopment, particularly within our historic market towns? • increase public awareness of the historic environment?
	• Conserve and enhance the historic environment of the district.	• improve housing affordability? • provide sufficient affordable housing for those who need it? • be appropriately located having regard to facilities, services and environmental quality? • reduce the number of second homes delivered on new developments? • provide energy efficient homes? • provide housing that is designed and constructed sustainably, using where feasible recycled or recovered materials?
	• Meet local need for housing by maintaining a sustainable level of supply and ensure that new housing is as sustainable as possible in terms of its location,	

Topic	Objectives	Appraisal questions: Will the option / proposal help to...
	construction materials and internal and external facilities.	• retrofit sustainable infrastructure, where possible? • provide good garden / light standards?
 Landscape	• Conserve, restore and enhance the character of landscapes in the district.	• conserve, restore and enhance the landscape (character, appearance and quality) of the district, including landscape assets, trees, setting of settlements? • maintain the tranquillity of the district, including the protection and promotion of Dark Skies? • support the integrity of the Cotswolds National Landscape in line with the vision and objectives of the latest published management strategy? • safeguard the integrity of Special Landscape Areas across the district?
 Land, Soil and Water Resources	• Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	• enable and promote reuse, recycling and reduction of waste generated in the district? • encourage local community recycling. reuse and minimisation of waste in new developments?
	• Support the efficient use of land.	• avoid development on the best and most versatile agricultural land? • increase the percentage of development on previously developed land? • promote remediation of contaminated land?
	• Encourage the prudent use of natural resources.	• avoid sterilisation of identified mineral resource areas?

Topic	Objectives	Appraisal questions: Will the option / proposal help to...
	• Protect and enhance water quality and minimise water use.	• protect groundwater and surface water quality? • ensure that development is supported by adequate water supply and drainage? • reduce per capita water consumption through the use of rainwater recycling, grey water reuse or other methods?
 Transport and Air Quality	• Reduce the need to travel by private car, reduce traffic congestion and air pollution through improving travel choice by active encouragement of modal shift and facilitation of more sustainable forms of transport.	• reduce the need to travel? • encourage modal shift, particularly in respect of journeys to work, through walking, cycling and use of public transport? • promote sustainable and active travel for all residents including the needs of specific groups and the infrastructure required to support that? • prevent the exacerbation of air pollution in areas susceptible to poor air quality?

Appendix D Settlement-by-settlement discussion of sites

Main Settlement

Cirencester

Land to the north of the A429, which bisects the central section of the market town, is within the Cotswolds National Landscape. The Town Centre, framed by the A429 ring road, is a designated Conservation Area which contains several Scheduled Monuments and Grade I Listed Buildings. There is a Special Landscape Area to the north east and to the south west of the town, and Cirencester Park Historic Park and Garden extends to the west of the town (north of the A419).

Land to the south east of the town is comparatively less constrained, with key constraints including areas of Flood Zone 2 and Flood Zone 3 (associated with the River Churn and the Thames and Severn Canal), Conservation Areas in the villages of Driffild, Harnhill, and Preston, and Groundwater Source Protection Zones. On this basis, the following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension:

- 'Land east of Kingshill Lane, Cirencester' (C164A).
- 'Steadings southern extension, Cirencester' (C190).
- 'The Whiteway, Cirencester' (C132).

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Cirencester:

- Two of these sites have planning permission, specifically C39 and C80.
- Two of these sites are lower than the threshold of five homes reflecting their indicative capacities or are not within or adjacent to Cirencester and therefore represent an unsustainable location for growth, specifically C168 and C172D.
- C178 is within the Cotswold National Landscape and has a 'high' sensitivity. The indicative capacity for the site is close to the threshold for a sustainable urban extension, which would constitute major development within the National Landscape.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: C52, C57, C70, C71, C79A, C81B, C97, C101A, C101B, C106B, C111, C149A, C149B; and R614 (for employment).

Principal Settlements

Andoversford

The village is wholly located within the Cotswolds National Landscape. Land to the north west of the village is a Scheduled Monument (Roman small town at Wycomb), which overlaps with an area of Deciduous Woodland Priority Habitat. There are corridors of Flood Zone 2 and Flood Zone 3 passing through the village, associated with the River Coln (and its tributaries).

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Andoversford, R231 is not located adjacent to the settlement. An allocation at this location would result in isolated development, approximately 1.5km to the west of the village, contrary to the broad spatial strategy for the emerging Local Plan.

Reflecting the above, only one non-strategic site option has been considered in detail through Stage 3 of the site selection process, specifically: A2.

Blockley

The village is wholly located within the Cotswolds National Landscape. Most of the village itself is a designated Conservation Area (with associated Grade II and Grade II* Listed Buildings). An area of land to the north east of the village is within Flood Zone 3, which connects to Blockley Brook.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Blockley:

- R33A, R33B, and R501 are not located adjacent to the settlement and allocating these locations would result in isolated development, approximately 3km to the east of the village, contrary to the broad spatial strategy for the emerging Local Plan. R33B and R501 are adjacent sites, outside but within the setting of the Cotswolds National Landscape. All three sites are within a Special Landscape Area.
- R585 is approximately 1km to the north of the village within an industrial centre. Whilst the site is primarily brownfield land, development at this location would be isolated from the village, contrary to the broad spatial strategy for the

emerging Local Plan. Additionally, approximately 30% of the site contains deciduous woodland priority habitat, and 'Sedgecombe Wood' is an ancient, replanted woodland directly to the north of the site.

- R610 and R688 are located approximately 2km to the north east of the village. Allocating these locations would result in isolated development outside of the village boundaries, contrary to the broad spatial strategy for the emerging Local Plan. R610 is within the Cotswold National Landscape, with R688 adjacent to, and within the setting of the National Landscape. R688 is within a Special Landscape Area.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: BK8A, BK8B, BK11, BK14A, R533, R663, R69, and RUR_E16.

Bourton-on-the-Water

The village is wholly located within the Cotswolds National Landscape and is often referred to as "the Venice of the Cotswolds". Much of the southern section of the village is a designated Conservation Area, which borders two Scheduled Monuments to the east and west. The Scheduled Monument to the east overlaps with Greystones Farm Nature Reserve, which connects to Salmonsbury Meadows Site of Special Scientific Interest (SSSI). Most of the land to the east of the village, and land passing through the southern section of the village (from the west), is within Flood Zone 3. The areas broadly follow the corridor of the River Windrush (and its tributaries), and the lakes to the north of Nethercote. Several established footpaths pass through the village from the surrounding countryside, including Windrush Way, Macmillan Way, and the Heart of England Way.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Bourton-on-the-Water:

- B32 has planning permission for phased redevelopment of residential and retirement housing but is not yet built out. The site is considered deliverable during the first five years of the plan period.
- B57 is entirely covered by Priority Habitat and is subject to extensive flood risk constraints, with the majority of the site located within Flood Zone 3. Whilst the site adjoins an existing employment area, the extent of environmental constraints would make development difficult to accommodate without unacceptable impacts.

Reflecting the above, only one non-strategic site option has been considered in detail through Stage 3 of the site selection process, specifically: B56.

Chipping Campden

The village is wholly located within the Cotswolds National Landscape and often referred to as the “jewel in the crown” of the Cotswolds. Most of the central section of the village is a designated Conservation Area, which includes the High Street where almost all of the buildings are either Grade II, Grade II*, or Grade I Listed. Land to the east of the Conservation Area comprises Campden House Historic Park and Garden. Most of the undeveloped land to the north, east, and south east of the village comprises Grade I or Grade 2 Agricultural Land, which is some of the best and most versatile agricultural land within the country. Several established footpaths pass through the market town and connect to the surrounding countryside, including Cotswold Way, Monarch’s Wat, and the Heart of England Way.

Within the HELAA, of the sites which are classified as ‘potentially deliverable / developable’ or ‘deliverable / developable’ for non-strategic scale development at Chipping Campden, CC59 has planning permission for five dwellings but is not yet built out. The site is considered deliverable during the first five years of the plan period.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: CC10A, CC66B, CC68, CC71, and CC74 (western section of the site).

Fairford

Most of the northern half of the town is a designated Conservation area, containing Grade I, Grade II, and Grade II* Listed Buildings. Land to the north of the town is within a Special Landscape Area, encompassing Fairford Park estate. The River Coln (and areas of Flood Zone 2 and Flood Zone 3) passes through the Special Landscape Area and the town, continuing to the south east where it forms the southern border of the Whelford Meadows SSSI and Cotswold Water Park SSSI. The SSSIs comprise a series of lakes which extend northward from the River Coln to the A417. Land to the south of the town is also within the boundary of the Cotswold Water Park SSSI, which extends to RAF Fairford. The south of the town also comprises areas of Grade 2 and Grade 3a ‘best and most versatile’ agricultural land. The town is not within the Cotswolds National Landscape.

Additionally, Land to the north east and to the west of Fairford is comparatively less constrained, with key constraints including the setting of the Special Landscape Area, SSSI Impact Risk Zones, and Groundwater Source Protection Zones.

Reflecting the above, the following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension: ‘Land north east of Fairford’ (F57A, F57B, F57C).

Within the HELAA, of the sites classified as ‘potentially deliverable / developable’ or ‘deliverable / developable’ for a sustainable urban extension, ‘Land to the south west of Fairford (F53A and F53B)’ could deliver up to 420 homes reflecting the indicative site capacities within the HELAA. An outline planning application of 74 homes has come forward on Site F53A. Constraints to development across Site F53B limit further opportunities for expansion, given the adjacent SSSI and its associated Impact Risk Zones. On this basis, the sites are considered separately for potential non-strategic development during the plan period.

Within the HELAA, the following 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Fairford have been considered in detail through Stage 3 of the site selection process, specifically: F20A, F39C, F45, F52, F53A, F53B, F56A, and F56B.

Kemble

A Special Landscape Area encompasses the town and the surrounding land to the north, east, south east, and north west. Most of the town is a designated Conservation Area. There are areas of Flood Zone 2 and Flood Zone 3 to the north east and north west, following the corridor of the River Thames (and its tributaries). The Kemble Railway Cuttings SSSI is also located to the north west of the town, with areas of Deciduous Woodland Priority Habitat to the north east of the town surrounding the dismantled railway. Kemble Railway Station is at the north western extent of the town, and Cotswold Airport is approximately 1.5km to the west of the town (via the A429). The town is not within the Cotswolds National Landscape.

Land to the south west of the town is comparatively less constrained, albeit located within the setting of the Special Landscape Area. There are isolated areas of Deciduous Woodland Priority Habitat (including Kemble Wood), SSSI Impact Risk Zones associated with Kemble Railway Cuttings, and areas within Groundwater Source Protection Zones.

Within the HELAA, of the sites classified as 'potentially deliverable / developable' or 'deliverable / developable' for a sustainable urban extension, Cotswold Airport (K7A and K7B) currently accommodates around 620 employees, alongside a substantial volume of visitors and customers, with aspirations for further growth. However, the site has since been confirmed as being unavailable for a local plan allocation. The following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension: 'Land south west of Kemble' (K9, K12, K15, K16).

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Kemble, R542 is located approximately 1km to the east of the town. Allocating this site would result in isolated development outside of the town, contrary to the broad spatial strategy for the emerging Local Plan.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: K1A, K3, and K6A.

Lechlade-on-Thames

Located toward the south eastern boundary of the district, Lechlade borders the neighbouring authorities of West Oxfordshire, Swindon, and the Vale of White Horse. The River Thames passes along the southern boundary of the town, with areas of Flood Zone 2 and Flood Zone 3 encompassing most of the undeveloped areas to the east, south east, and south west of the town. These areas are also underlain by Grade 2 agricultural land, which is some of the best and most versatile agricultural land within the country. Cotswold Water Park SSSI extends to the north of the town, and the 'Multi-period settlement, cemetery, and ceremonial complex west of Lechlade' Scheduled Monument is located to the north west of the town. The southern section of the town is a designated Conservation Area, containing all of the town's Grade I and Grade II Listed Buildings. The town is not within the Cotswolds National Landscape.

In terms of strategic opportunities, R683 and R684 are located approximately 1km to the west of the town. The combined capacities of these sites would not exceed the minimum threshold of 1,500 homes required to constitute as a 'new settlement'. Reflecting the above, the following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension: 'Cluster of sites to the west of Lechlade, within proximity to Lechlade Garden Centre' (L34, L37, L43).

Within the HELAA, the following sites classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Lechlade have been considered in detail through Stage 3 of the site selection process, specifically: L13, L14, L16A, L26, L32, L33, and L35A.

Mickleton

Land to the east, south east, south, and south west of the village is within the Cotswolds National Landscape. The central and southern section of the village is a designated Conservation Area, with the Grade II Listed 'Kiftsgate Court' Historic Park and Garden also to the south east. Land to the north of the village is relatively unconstrained, although it is classified as Grade 2 (very good quality) 'best and most versatile' land for agricultural uses. To the west, areas of Flood Zone 2 and Flood Zone 3 broadly follow the corridor of Norton Brook, with a Special Landscape Area covering land to the west of the Brook (including Thistley Hill). The Heart of England Way passes through the village.

Reflecting the above, the following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension: 'Land to the north and west of Mickleton' (MK1AB, MK3, MK16, MK17, MK21, MK22, MK23, MK12A, MK18, MK19, MK20B).

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Mickleton, MK12B has received planning permission for a residential development and is not yet built out. The site is considered deliverable within the first five years of the plan period.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: MK1C, MK2B, MK2C, MK7, MK11A and MK11C.

Moreton-in-Marsh

The Cotswolds National Landscape encompasses land to the south west, west, and north west of the town. Land to the north and to the south of the town is within a Special Landscape Area, with these areas also including the 'Roman small town at Dorn' Scheduled Monument (to the north) and Grade 2 Agricultural Land (to the south). The western section of the town, west of Moreton-in-Marsh Railway Station and including the built-up areas surrounding the A429 and A44, is a designated Conservation Area. The Conservation Area contains the majority of the town's Grade II and Grade II* Listed Buildings, with the 'Batsford Camp

(adjacent to Queen Victoria's Garden)' Scheduled Monument marking the Conservation Area's northern extent. Corridors of Flood Zone 2 and Flood Zone 3 follow the River Evenlode (and its tributaries) to the south of the town.

Land to the east of the town is comparatively unconstrained, although it is within the setting of the Special Landscape Areas to the north and to the south. There is also an interconnected network of Deciduous Woodland Priority Habitat surrounding the Fire Service College (north of the A44 and south of Todenham Road).

Within the HELAA, of the sites classified as 'potentially deliverable / developable' or 'deliverable / developable' for a sustainable urban extension, 'Land to the north, east and south of Moreton-in-Marsh' and 'Land to the south and east of Moreton-in-Marsh' are assessed as a potential sustainable urban extension. To the south east of these potential sustainable urban extensions, 'Land at Coldicote Farm' (M83) also has an indicative capacity which exceeds 350 homes. As the site is not immediately adjacent to the town, development at this location would fall into the 'new settlement' category based on the site selection methodology. However, as the site would adjoin the sustainable urban extension at Moreton-in-Marsh if either 'Land to the north, east, and south of Moreton-in-Marsh' or 'Land to the south and east of Moreton-in-Marsh' is taken forward as an allocation, it has been tested within the sustainable urban extension category for completeness.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Moreton-in-Marsh, M71A and M28B have received planning permission for residential development but are not yet fully built out. The sites are considered deliverable within the first five years of the plan period. Additionally, M70 is subject to a pending application for residential development (ref. 25/04041/OUT) and is therefore not available for employment development. It is anticipated that M70 and M71A will form part of the land to the south and east of Moreton-in-Marsh if this sustainable urban extension is taken forward as a Local Plan allocation.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: M11, M22, M74A (eastern section of M74 considered through HELAA), and M78 (for employment).

Northleach

The village is wholly within the Cotswolds National Landscape, with several public rights of way connecting the village with the surrounding countryside. This includes the Diamond Way, Monarch's Way, and Fosse Way. Most of the village is a designated Conservation Area, including Grade I, Grade II, and Grade II* Listed Buildings. Areas of Flood Zone 2 and Flood Zone 3 follow the corridor of the River Leach, through the western section of the village before extending alongside its southern boundary.

Reflecting the above, only one site has been classified as 'potentially deliverable / developable' within Northleach, specifically: N14B. In July 2026, the Council resolved to grant planning permission for 50 homes on the site. On this basis, **no site options within Northleach have been assessed in detail through Stage 3 of the site selection process.**

Siddington

Located approximately 750m to the south of Cirencester, key constraints surrounding Siddington include areas of Grade 2 agricultural land (to the west), areas of Flood Zone 2 and Flood Zone 3 (to the east) associated with the River Churn and the Thames and Severn Canal, and areas of Deciduous Woodland Priority Habitat and the Cotswold Water Park SSSI (to the south). Areas to the south east, south, and south west of the village overlap with a Groundwater Source Protection Zone. The village is outside of the Cotswolds National Landscape.

There are several opportunity sites for development around Siddington, particularly to the north and to the south. A key consideration for the site selection process is the extent to which growth may reduce the openness between Siddington and Cirencester and increase likelihood of coalescence.

Reflecting the above, the following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension:

- 'Land south west of Siddington' (SD20).
- 'Land north of South Cerney Airfield' (SD24).

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: SD3A, SD5, SD6, SD8, SD9A, SD9B, SD9C, SD11B, SD15, SD17, SD21, SD22, and SD23.

South Cerney

Located towards the southern extent of the district and sharing a boundary with Wiltshire, South Cerney is surrounded by the Cotswold Water Park SSSI to the east, south, and to the west. Land to the west is also primarily underlain by Grade 2 (Very Good) Agricultural Land and areas of Flood Zone 2 and Flood Zone 3 associated with the River Churn and the Water Park. The northern section of the village is a designated Conservation Area, containing most of the village's Grade I and Grade II Listed Buildings. 'South Cerney Castle' Scheduled Monument is located adjacent to the northern boundary of the Conservation Area. The village is outside of the Cotswolds National Landscape.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at South Cerney:

- R556, R600, and R645 are not located adjacent to the settlement and allocating these locations would result in isolated development, approximately 1.5km to the north east of the village, contrary to the broad spatial strategy for the emerging Local Plan.

- R601, SC20, and SC21 are located between 250-750m to the north of the village, alongside South Cerney Road and adjacent to South Cerney Airfield (to the east). Allocating these locations would deliver growth in comparatively isolated locations outside of the existing core of the village, contrary to the broad spatial strategy.
- R673 and RUR_E12 are located approximately 1.5km and 600m to the south east of the village, respectively. Both sites contain areas of Flood Zone 2 or Flood Zone 3 and are adjacent to the Cotswold Water Park SSSI. In light of this, the sites are excluded from further assessment.
- SC36 and SC37 are adjacent to the north of the village, to the east and west of South Cerney Road. The Study of Land Surrounding Settlements (July 2026) concludes that SC36 has a 'medium-high' sensitivity, and SC37 has a 'high' sensitivity. Additionally, SC32 is adjacent to the western edge of the village and is also concluded as having a 'medium-high' sensitivity. The justification for these sensitivity ratings outlines:
 - SC32: The site forms part of the western rural edge of South Cerney, contributing to the green and open setting of the village and maintaining a distinct transition between settlement and countryside.
 - SC36: Development would represent encroachment into a rural landscape, although this is tempered by the level of enclosure and adjacent permanent boundary created by the railway embankment. The setting of the listed buildings within and adjacent to the parcel would likely restrict the scale of any development.
 - SC37: The site occupies a visually and physically prominent position on the north-western edge of South Cerney. The undulating landform rising to the west increases visibility, where open views across the site and surrounding countryside are available. The parcel reads clearly as open countryside forming part of the rural setting and western transition of the village.

Reflecting the above, **no site options within South Cerney have been assessed in detail through Stage 3 of the site selection process.**

Stow-on-the-Wold

Located approximately 250m above sea level, Stow-on-the-Wold is the highest town in the district. Wholly within the Cotswolds National Landscape, the town is at a junction between several public rights of way, including Gloucestershire Way, Monarch's Way, Macmillan Way, and the Heart of England Way. Most of the central and south eastern sections of the town are a designated Conservation Area, with the Grade II* Listed 'Abbotswood' Historic Park and Garden encompassing land to the west of the town.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Stow-on-the-Wold:

- S14A has planning permission for residential development but is not yet built out. The site is considered deliverable during the first five years of the plan period.
- There is a cluster of four sites adjacent to the northern boundary of the town, all of which have received a 'medium-high' sensitivity rating within the Study of Land Surrounding Settlements (July 2026). The justification for these sensitivity ratings outlines:
 - S51: Due to its elevated position, rural approach setting, and role in defining the northern edge of Stow-on-the-Wold, the site exhibits the characteristic features of the High Wold Plateau, including open fields, stone walls, and far-reaching views that are strongly representative of the Cotswold landscape.
 - S65A / S65B: Reflecting their elevated position, open westerly views, and role in defining the north-western edge of Stow-on-the-Wold, the sites form part of a visually prominent approach, contributing to special qualities of scenic beauty, settlement containment, and the historic character of the High Wold plateau.
 - S66: This is due to its elevated and open character, traditional field pattern, and clear physical and visual separation from the existing settlement. The site occupies part of the High Wold Plateau and contributes strongly to the rural, expansive setting that defines Stow-on-the-Wold's northern approach.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: S14B, S55B, and S68.

Tetbury

Tetbury is wholly within the Cotswolds National Landscape. Land to the north and to the west of the town is primarily underlain by areas of Grade 2 (Very Good) Agricultural Land. Veizey's Quarry SSSI is approximately 400m to the north west of the town. From a heritage perspective, the southern half of the town is a designated Conservation Area, containing the majority of the town's Grade I, Grade II, and Grade II* Listed Buildings. 'Tetbury Camp' Scheduled Monument forms the southern extent of the Conservation Area. Areas of Flood Zone 2 and Flood Zone 3 broadly follow the corridor of the River Avon, along the eastern, southern and western boundaries of the town.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Tetbury, the following are classified as having a 'medium-high' or 'high' sensitivity within the Study of Land Surrounding Settlements (July 2026), with the justifications as follows:

- T45: Reflecting its sloping topography, open visual relationship with the western countryside, and role in defining the town's green edge. The site forms part of the rural setting of Tetbury, where open land, riparian vegetation, and the floodplain create a natural transition between built form and the wider lowland landscape. Although the site is

physically enclosed by development on two sides, its exposed slope, ecological value, and visual prominence contribute to its overall sensitivity.

- T52: Reflecting its pastoral landscape character, sloping topography, and role as part of the undeveloped eastern approach to Tetbury. The site lies within the Cotswolds National Landscape, where open farmland, hedgerows, and mature trees define the transition between the town and its rural setting. Although new residential development is present to the north, the site remains visually and perceptually separate, maintaining a strong rural identity and contributing to the sense of openness on approach from Cirencester Road.
- T74: Discounted during Stage 1 of the Study of Land Surrounding Settlements due to the following four factors: its location on a prominent ridgeline, escarpment or high ground; falls within clear views from public vantage points; would extend the settlement in an uncharacteristic direction or weaken form; and would not be attached / adjacent to existing development.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: T31B, T49, T57, T70, T71A, and T76.

Upper Rissington

The whole of the village is within the boundaries of the Cotswolds National Landscape. There are several areas of Deciduous Woodland Priority Habitat to the north, east, and west of the village. RAF Little Rissington Airfield encompasses land to the south.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Upper Rissington, UR4A and UR4B were excluded at Stage 1 of the Study of Land Surrounding Settlements (July 2026) due to the following factors: located on prominent ridgelines, escarpments, or high ground; falls within clear views from public vantage points; and introduce a significant area of built form into a rural or visually sensitive landscape.

Reflecting the above, only one non-strategic site option has been considered in detail through Stage 3 of the site selection process, specifically: UR1A.

Non-Principal Settlements

Avening

The whole of the village is within the boundary of the Cotswolds National Landscape. Areas of Flood Zone 2 and Flood Zone 3 follow the corridors of the watercourses which pass through the village and extend to the north, east, and south west. Most of the village is a designated Conservation Area, split into two sections covering the western and south eastern sections.

Within the HELAA, none of the available site options within Avening are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Avening due to their 'high' landscape sensitivity. Specifically, the Study of Land Surrounding Settlements (July 2026) notes that Avening is highly sensitive to change due to its location within a steep-sided valley landscape, its strong historic character and its position within the Cotswolds National Landscape. The surrounding valley sides are particularly sensitive as they provide the essential landscape setting to the village and create the characteristic sense of enclosure. Development on these slopes would be highly visible and could detract from the wooded and pastoral backdrop that defines the settlement. The village is also sensitive to development that would contribute to the coalescence of built form along the valley floor or result in the erosion of the distinct settlement pattern that has evolved in response to the valley landform.

Reflecting the above, **no site options within Avening have been assessed in detail through Stage 3 of the site selection process.**

Bibury

Bibury is entirely within the Cotswolds National Landscape, with most of the village a designated Conservation Area. There are three Grade I and two Grade II* Listed Buildings within the Conservation Area, with the 'Bibury Roman villa near Bibury Mill' Scheduled Monument marking its eastern boundary. The River Coln passes through the centre of the village (east to west), with areas of Flood Zone 2 and Flood Zone 3 surrounding the river corridor.

The Study of Land Surrounding Settlements (July 2026) states that Bibury is highly sensitive to change due to the exceptional quality of its historic and landscape setting within the River Coln valley and the Cotswolds National Landscape. The strong relationship between the settlement, the river corridor and the enclosing valley sides forms an essential component of the village's character and scenic value. The valley sides surrounding the settlement are particularly sensitive as they provide the visual and physical setting to the village and allow views across and along the valley. Development on elevated land or upper valley slopes would be visually prominent and would risk eroding the contained and secluded character of the settlement. Additionally, land closely associated with the Conservation Area, the river corridor and the historic core of the village is also highly sensitive due to the contribution these areas make to the significance, character and appearance of Bibury.

Reflecting these sensitivities, none of the available site options within and adjacent to Bibury are classified as ‘potentially deliverable / developable’ or ‘deliverable / developable’ for non-strategic scale development at Bibury. Whilst R677 is the only site afforded a ‘medium’ sensitivity within the Study, the site is not adjacent to the village and would add to the ribbon development along the B4425. The location of R677 outside of the village is contrary to the broad spatial strategy for the emerging Local Plan.

Reflecting the above, **no site options within Bibury have been assessed in detail through Stage 3 of the site selection process.**

Bledington

Bledington is located towards the eastern boundary of the district, within proximity to the neighbouring authority of West Oxfordshire. The whole of the village is within the Cotswolds National Landscape. Most of the land surrounding the village is within Flood Zone 2 and Flood Zone 3, following the corridors of the Bledington Brook, Westcote Brook, and Cornwell Brook. The brooks are tributaries of the River Evenlode, which passes to the east of the village. Land to the north of Church Lane is designated as a Conservation Area and contains most of the village’s Grade II Listed Buildings. The village is approximately 1km to the west of Kingham Railway Station, located in West Oxfordshire.

Within the HELAA, all of the four available site options within Bledington are classified as ‘not deliverable / developable’. In light of this, **no site options within Bledington have been assessed in detail through Stage 3 of the site selection process.**

Bourton-on-the-Hill

The whole of the village is within the boundaries of the Cotswolds National Landscape, with most of the village also a designated Conservation Area. The Grade I Listed ‘Church of St Peter’ and the Grade II* Listed ‘Bourton House’ are within the Conservation Area, along with the ‘Tithe Barn, Bourton House’ Scheduled Monument (at its eastern boundary). With regard to local ecological assets, there are areas of Deciduous Woodland Priority Habitat to the north, south west, and west of the village. ‘Bourton Woods’ is an area of Ancient Replanted Woodland to the north west of the village, between the A44 and B4479.

The Study of Land Surrounding Settlements (July 2026) states that Bourton-on-the-Hill is highly sensitive to change due to its elevated position on the Farmed Slopes and its strong visual relationship with the surrounding landscape. The village itself is highly visible from parts of the surrounding vale and benefits from extensive outward views. Development on exposed edges or prominent slopes would have the potential to alter the character of the settlement and affect its relationship with the wider landscape.

Reflecting the above, only one site has been classified as ‘potentially deliverable / developable’ within Bourton-on-the-Hill and has been considered in detail through Stage 3 of the site selection process, specifically: R83.

Broadwell

Along with the village itself, land to the north, south, and west of the village is within the Cotswolds National Landscape. Most of the village is a designated Conservation Area, containing clusters of Grade II Listed Buildings, three Grade II* Listed and one Grade I Listed Buildings. 'Broadwell Roman villa' Scheduled Monument is located approximately 250m to the north west of the village.

The Study of Land Surrounding Settlements (July 2026) states that Broadwell exhibits generally high landscape sensitivity due to the strong relationship between the settlement, the River Evenlode, the extensive village green and the surrounding agricultural landscape. Land to the east of the village is comparatively less constrained, albeit within the setting of the National Landscape.

Reflecting the above, the following non-strategic site options classified as 'potentially deliverable / developable' within the HELAA have been considered in detail through Stage 3 of the site selection process, specifically: R89, R90, and R682.

Chedworth

Chedworth is wholly within the Cotswolds National Landscape and most of the village is a designated Conservation Area. There are several areas of Deciduous Woodland Priority Habitat within and surrounding the village (including the Stony Furlong Railway Cutting SSSI), with larger areas of interconnected and ancient woodland approximately 500m to the north of the village (including Burfords Grove and Chedworth Woods). There is a corridor of land to the east of the village within Flood Zone 2 and Flood Zone 3, associated with a tributary of the River Coln.

The Study of Land Surrounding Settlements (July 2026) states that Chedworth is highly sensitive to change due to the strong relationship between the settlement, the valley landform, the surrounding High Wold landscape and its exceptional historic environment. The valley sides surrounding the village are particularly sensitive as they form the immediate setting of the settlement and contribute to views into and out of the village. Development on these slopes would be prominent and could erode the intimate and secluded character of the valley landscape. Limited opportunities may exist for small-scale development closely related to the existing built framework of the village where proposals can be accommodated without harming the landscape setting, historic character or wider National Landscape.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Chedworth:

- R505 and R534 are excluded at Stage 1 of the Study of Land Surrounding Settlements due to the following factors: would not be attached / adjacent to existing development; would introduce a significant area of built form into a rural or visually sensitive landscape; would extend settlement in an uncharacteristic direction or weaken form; and for R534, falls within clear views from public vantage points.

- R98 has 'medium to high' sensitivity to development. The site occupies an open and transitional position on the northern edge of Chedworth and forms part of the rural setting of the village within the Cotswolds National Landscape. Although influenced by existing recreational uses and adjacent residential development, the site retains an open and semi-rural character that contributes positively to the settlement edge and wider landscape setting.

Reflecting the above, only one non-strategic site option has been considered in detail through Stage 3 of the site selection process, specifically: R504.

Didmarton

Located towards the south western boundary of the district, adjacent to Wiltshire, Didmarton is wholly within the Cotswolds National Landscape. There is a corridor of land to the east of the village which is within Flood Zone 2 and Flood Zone 3, associated with Joyce's Pool (a source of the River Avon). Most of the village is a designated Conservation Area, with land to the south west comprising the Grade I Listed 'Badminton House' Historic Park and Garden.

The Study of Land Surrounding Settlements (July 2026) states that the undeveloped countryside surrounding Didmarton plays an important role in maintaining the settlement's rural character, preserving views and preventing the erosion of its distinct identity. Limited opportunities may exist for small-scale development where proposals are well related to the existing built form, avoid visually prominent locations and retain the characteristic landscape structure of the area.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Didmarton:

- R437 has a medium-high sensitivity. The site occupies a sensitive edge-of-settlement location on the western approach into Didmarton where the village transitions into the surrounding open countryside. Whilst the site contains existing barns and areas of hardstanding, it nevertheless retains a relatively open and semi-rural character due to the mature vegetation, open western aspect and relationship with the wider rural landscape.
- R439 has a medium-high sensitivity. The site forms part of the pastoral landscape on the southern edge of Didmarton and contributes positively to the rural setting of the village within the Cotswolds National Landscape. Although physically adjacent to existing residential development, the site remains visually and spatially associated with the wider countryside beyond the established ribbon pattern of development along The Street.
- R440 has a medium-high sensitivity. The site occupies a sensitive position on the northern edge of Didmarton where the existing settlement transitions into the surrounding rural landscape. Although the site is closely associated with

adjacent residential development and existing settlement form, it nevertheless contributes positively to the open character and historic setting of the village edge within the Cotswolds National Landscape.

Whilst R436 is the only site afforded a 'medium-low' sensitivity within the Study, the indicative capacity of the site within the HELAA is below the minimum threshold of five dwellings and has been excluded at Stage 1 of the site selection process. Reflecting the above, **no site options within Didmarton have been assessed in detail through Stage 3 of the site selection process.**

Down Ampney

Most of the undeveloped areas surrounding the village is either Grade 1, Grade 2, or Grade 3a Agricultural Land, which is some of the best and most versatile agricultural land in the country. Land to the south of the village is within a Minerals Safeguarding Area at the former RAF Down Ampney Airfield. The southern extent of the village is a designated Conservation Area, containing Grade I and Grade II listed buildings, with land to the south east of the village comprising the Settlement at Bean Hay Copse Scheduled Monument. To the west, areas of Flood Zone 2 and Flood Zone 3 comprise the undeveloped areas of land between the village and Ampney Brook. The village is not within the Cotswolds National Landscape.

The Study of Land Surrounding Settlements (July 2026) states that the landscape surrounding the village is generally large scale, relatively open agricultural land and strongly defines the rural character of the area. On this basis, the following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension:

- 'Land east of Down Ampney' (DA20B).
- 'Land south of Down Ampney' (DA17B).
- 'Land surrounding Down Ampney' (DA5, DA17A, DA20A, DA21, DA22A, DA32).

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Down Ampney:

- DA4A has a medium to high sensitivity. The site occupies a transitional position between the built edge of Down Ampney and the wider countryside. Its open and level form, combined with the presence of PRow Footpaths 3 and 4, gives the land an accessible and visually sensitive character. The open southern boundary provides views across adjoining farmland, contributing to the perception of rural openness around the settlement. Although the site's use for flower cultivation and its proximity to residential development reduce susceptibility in part, it still plays an important role in maintaining the rural edge and visual connection between the village and its countryside setting. The PRow

are particularly influential, creating frequent viewpoints across the land and strengthening recreational and perceptual sensitivity

- DA8 has planning permission for residential development but is not yet fully built out. The site is considered deliverable within the first five years of the plan period.
- DA16A has significant flood risk constraints which, together with landscape, heritage and locational constraints, substantially reduce its suitability for employment development. The site's rural location and limited accessibility make it less attractive than alternative employment opportunities in more accessible locations.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: DA4, DA5D, and DA7.

Kempsford

Kempsford is a village located toward the south eastern boundary of the district, adjacent to the neighbouring authority of Swindon. Land to the north of the village primarily comprises RAF Fairford. Land to the south and to the west is within Flood Zone 2 and Flood Zone 3, following the corridor of the River Thames. From a heritage perspective, the village core is a designated Conservation Area. Key features of the Conservation Area include a corridor of Deciduous Woodland Priority Habitat alongside the River Thames, and a cluster of Grade II Listed Buildings surrounding the Grade I Listed 'Church of St Mary the Virgin (toward the eastern boundary of the village). 'Sites near Manor Ham Barn' Scheduled Monument sits approximately 750m to the west of the village. The village is outside of the Cotswolds National Landscape.

The Study of Land Surrounding Settlements (July 2026) states that the village is characterised by a strong historic core centred on St Mary's Church, Kempsford Manor and a collection of traditional limestone buildings. Development extends along the principal routes through the village, creating a predominantly linear settlement pattern with occasional clusters of more recent residential development. The open and relatively flat nature of the landscape means that development on the settlement edge can be visible across a wide area and has the potential to affect the rural character of the floodplain. The village's historic core, church, mature trees and river corridor form key components of local character and are particularly sensitive.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Kempsford:

- R202 and R202A have a 'medium-high' to 'high' sensitivity. Whilst parts of the site are associated with existing agricultural and equestrian activity, the overall site extends beyond the established settlement edge and forms part of the wider rural landscape surrounding the village. Historic character and setting are particularly important

considerations. The site adjoins the Kempsford Conservation Area and contributes to the setting of both Church of St Mary the Virgin and Manor Farm Barns. The open agricultural character, paddocks and fields form part of the wider rural setting within which these heritage assets are experienced. Over 50% of the site areas are within Flood Zone 2 or Flood Zone 3, adding further sensitivities to development.

Reflecting the above, the following non-strategic site options (all to the north of the village) have been considered in detail through Stage 3 of the site selection process, specifically: R203A, R203B, R203C.

Longborough

The village is wholly within the Cotswolds National Landscape. To the north east, a corridor of land within Flood Zone 2 and Flood Zone 3 broadly follows a watercourse towards Moreton-in-Marsh (for approximately 2km) before connecting to the River Evenlode. There are areas of Deciduous Woodland Priority Habitat to the south and to the south west of the village, including Horsington Plantation and Humble Bee Coppice which forms a green ring and natural buffer between Longborough and the neighbouring village of Donnington (to the south east). Within the village core, land surrounding High Street, The Folly, and Charlesway is a designated Conservation Area which is primarily lined with Grade II Listed Buildings. The Grade I Listed 'Church of St James' is toward the northern extent of the Conservation Area (and village).

The Study of Land Surrounding Settlements (July 2026) states that Longborough exhibits generally high landscape sensitivity owing to its elevated position, strong relationship with the surrounding landform and visibility within the wider landscape. The surrounding landscape displays many characteristic Cotswold features including rolling topography, dry stone walls, mature hedgerows, scattered woodland and historic field patterns. These elements contribute to landscape distinctiveness. R577 is the only site classified as having a 'medium-low' sensitivity but is designated as an Established Employment Site in the adopted Local Plan and is in active use as employment units (known as The Sitch). The Local Plan evidence base finds this site should continue to be protected for employment use and is therefore unsuitable for redevelopment.

Within the HELAA, none of the sites are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Longborough. R560 and R561 have planning permission for 9 and 14 homes respectively, and the developments are complete. The sites forms part of the 'known commitments' total for the emerging Local Plan. Additionally, R229C and R457 are classified as having a 'high' landscape sensitivity to development

Reflecting the above, **no site options within Longborough have been assessed in detail through Stage 3 of the site selection process.**

Meysey Hampton

Located to the south of the A417, and approximately 2.5km to the west of Fairford, Meysey Hamton is at the border between the Cotswold District and the neighbouring authority of Wiltshire. The village core is a designated Conservation Area containing clusters of Grade II Listed Buildings. There are two Grade II* Listed Buildings in the village, specifically: the Church of St Mary the Virgin (toward the western village boundary), and Villars Farmhouse (toward the south western village boundary). There are areas of Deciduous Woodland Priority Habitat to the south west and south east of the village, with corridors of Flood Zone 2 and Flood Zone 3 approximately 750m to the east and west (respectively). The village is not within the Cotswolds National Landscape.

There are **no available sites for residential development within or adjacent to Meysey Hampton** after reviewing the site submissions from the various 'call for sites' exercises completed by the Council to date. The only available site, R516, is approximately 2.5km to the north of the village and has permission for change of use from a former mushroom composting facility to provide Class B2 vehicle workshop. The site is not currently built out but is considered deliverable within the first five years of the plan period.

North Cerney

Wholly within the Cotswolds National Landscape, North Cerney is broadly linear in its character and extends to the north east from the A435 and River Churn. Land surrounding the River Churn is within Flood Zone 2 and Flood Zone 3, encompassing areas to the south and to the north west of the village. The southern half of the village is a designated Conservation Area, including clusters of Grade II Listed Buildings and the Grade I Listed 'Church of All Saints' (to the south west of the A435 and River Churn). The road and the river splits the Conservation Area into two sections. Areas of Deciduous Woodland Priority Habitat follow the river corridor and surround Cerney House, a Grade II Listed Building to the south west of the village and the Church of All Saints.

Within the HELAA, the two available site options within North Cerney (R262 and R263) are classified as 'not deliverable / developable'. In light of this, **no site options within North Cerney have been assessed in detail through Stage 3 of the site selection process.**

Poulton

Poulton is located along the A417 towards the southern boundary of the district. A tributary of Ampney Brook flows to the south west and to the west of the village, with a corridor of land surrounding the watercourse within Flood Zone 2 and Flood Zone 3. Most of the village is a designated Conservation Area, containing clusters of Grade II Listed Buildings (along London Road and Cricklade Street). The Grade I listed 'The Manor House and Gatepiers' stands in the village core, and 'Ranbury Ring' Scheduled Monument is approximately 750m to the west.

Land to the north east and south east of the village is comparatively unconstrained, albeit within the setting of the Conservation Area and comprising areas of open countryside. There are isolated areas of Deciduous Woodland Priority Habitat, and the village

is outside of the Cotswolds National Landscape. The Study of Land Surrounding Settlements (July 2026) states that whilst some opportunities may exist for limited and well-contained development, proposals should respect the settlement's rural setting, maintain characteristic landscape features and avoid visually prominent locations.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Poulton:

- R606 has been classified as having a 'medium-high' sensitivity. The site forms part of the open northern approach to Poulton, contributing to the rural setting and character of the village. Its gently rising topography, arable land use, and open northern views reinforce its role as a transitional space between built form and countryside. Although the site is influenced by adjacent residential properties, it remains predominantly rural and undeveloped, with strong visual and physical connections to the wider landscape to the north and east.
- R512 is located approximately 500m from the southern settlement edge of Poulton (via Cricklade Street), and approximately 1km to the south of the village centre. Allocating this site would result in isolated development outside of the village, contrary to the broad spatial strategy for the emerging Local Plan.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: R467, R468, R509, R517, and R607.

Preston

Preston is approximately 750m to the east of Cirencester and is a broadly linear village in character extending north eastward from the A419. The village has a functional relationship with Cirencester in this respect. The village core is a designated Conservation Area, centred around the Grade II* Listed 'Church of All Saints'. Land to the west of the village is within Flood Zone 2 and Flood Zone 3, following the corridor of the River Churn which extends to the south towards Siddington.

Land to the north, east, and south of the village is comparatively unconstrained, albeit within the setting of the Conservation Area and comprising areas of open countryside. There are isolated areas of Deciduous Woodland Priority Habitat, and the village is outside of the Cotswolds National Landscape. The Study of Land Surrounding Settlements (July 2026) states that the settlement remains relatively compact and linear in form, with development generally confined to the road corridor. Specifically, Preston exhibits generally moderate-high landscape sensitivity arising from its small scale, historic character and strong relationship with the surrounding agricultural landscape.

The following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension: 'Land south east of Cirencester and south of Preston' (R519, R650).

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Preston, R531 is detached from the existing settlement and is currently in active employment use.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: R281, R282B, R521, and R637.

Sapperton

Sapperton is located along the western boundary of the district, adjacent to the neighbouring authority of Stroud. The village is wholly within the Cotswolds National Landscape and is a designated Conservation Area. Land to the north and west of the village comprises a corridor of Deciduous Woodland Priority Habitat and Ancient Woodland which surrounds the River Frome. Daneway Banks SSSI is approximately 750m to the north west of the village, albeit within the neighbouring authority area. Land to the east is within the Grade I Listed 'Cirencester Park' Historic Park and Garden.

The Study of Land Surrounding Settlements (July 2026) states that Sapperton exhibits high landscape sensitivity due to the combination of its historic character, distinctive topography and location within the Cotswolds National Landscape. The High Wold Valley landscape is particularly sensitive to development due to its enclosed character, steep valley sides, extensive woodland cover and strong sense of tranquillity. Development has the potential to interrupt the secluded character of the valley and affect important views along and across the landscape. In light of this, all of the 'potentially deliverable / developable' sites within Sapperton (R660, R661, and R662) have been classified as having a 'medium-high' or 'high' sensitivity to development.

In light of the above, **no site options within Sapperton have been assessed in detail through Stage 3 of the site selection process.**

Swell

Comprising two distinct communities within Upper Swell and Lower Swell, the villages are approximately 1.5km to the west of Stow-on-the-Wold (via the B4077 and B4068, respectively) and entirely within the boundaries of the Cotswolds National Landscape. Land between Stow-on-the-Wold and the villages forms the Grade II* Listed 'Abbotswood' Historic Park and Garden. The River Dikler flows to the east of the villages, with a corridor of land adjoining the watercourse within Flood Zone 2 and Flood Zone 3. Both villages are designated Conservation Areas.

There are **no available sites for residential development within or adjacent to Upper Swell or Lower Swell** after reviewing the site submissions from the various 'call for sites' exercises completed by the Council to date.

Willersey

Land to the east and to the south east of the village is within the Cotswolds National Landscape, with land to the south west within the neighbouring authority area of Wychavon. Most of the village within the National Landscape is also designated as a Conservation Area, containing several Grade II Listed Buildings and the Grade I Listed 'Church of St Peter'.

The Study of Land Surrounding Settlements (July 2026) states that the southern part of the village is a more sensitive landscape consisting of smaller fields and hedges with more trees and occasional blocks of woodland. Land to the north, north east, and north west of the village is comparatively unconstrained, albeit within the setting of the National Landscape. A corridor of land within Flood Zone 2 and Flood Zone 3 follows the watercourse to the west of the village and forms the boundary between Cotswold District and Wychavon District.

The following sites (or clusters of sites) have been taken forward to Stage 3 of the site selection process for a potential sustainable urban extension: 'Cluster of sites to the north of Willersey' (W7B, W7B2).

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at Willersey:

- W7A1 has full planning permission for residential development but is not yet built out. The site is considered deliverable within the first five years of the plan period.
- W7A2 and W7C have a resolution to grant permission for 60 homes, and W8B has a resolution to grant permission for 30 homes.
- W8A1, W8A2, and W8C are classified as having a 'medium to high' sensitivity within the Study of Land Surrounding Settlements (July 2026).

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: W4B and W11.

The village cluster of Coln St Aldwyns, Hatherop, and Quenington

Coln St Aldwyns and Hatherop are within the boundaries of the Cotswolds National Landscape, with Quenington directly to the south and within its setting. The River Coln meanders between the villages, with a corridor of land adjacent to the watercourse within Flood Zone 2 and Flood Zone 3. Most of the land between the villages forms part of the Grade II Listed 'Hatherop Castle' Historic Park and Garden, with the villages themselves containing designated Conservation Areas. There are areas of Deciduous Woodland Priority Habitat (including some areas of Ancient Woodland) to the west of Coln St Aldwyns, to the north of Hatherop, and to the north of Quenington.

The Study of Land Surrounding Settlements (July 2026) states that Coln St Aldwyns, Hatherop and Quenington exhibit generally high landscape sensitivity due to their location within the Coln Valley and the strong relationship between the settlements, the river corridor and the surrounding agricultural landscape. The River Coln and associated floodplain, meadows, watercourses and riparian vegetation form key components of local character and are particularly sensitive to change. Development which adversely affects these features could diminish the distinctive valley character and setting of the settlements. The undeveloped countryside between and surrounding the settlements plays an important role in maintaining their separate identities and preventing the perception of coalescence within the valley.

Within the HELAA, of the sites which are classified as 'potentially deliverable / developable' or 'deliverable / developable' for non-strategic scale development at the village cluster of Coln St Aldwyns, Hatherop, and Quenington:

- R123, R608, and R609 in Coln St Aldwyns are excluded at Stage 1 of the Study of Land Surrounding Settlements due to the following factors: adjacent to / within designated heritage features; falls within clear views from public vantage points; introduce a significant area of built form into a rural or visually sensitive landscape; located on prominent ridgelines, escarpments or high ground (for R123); and would extend settlement in an uncharacteristic direction or weaken form (for R123 and R608).
- R681 in Quenington is also excluded at Stage 1 due to the factors listed above for the three Coln St Aldwyns sites. This is the only available site option in Quenington which is within the Cotswolds National Landscape.

Reflecting the above, the following non-strategic site options have been considered in detail through Stage 3 of the site selection process, specifically: Quenington (R538 and R591) and Hatherop (R670).

