CHELTENHAM
BOROUGH COUNCIL

CHELTENHAM LOCAL PLAN:
Regulation 19

HABITATS REGULATIONS ASSESSMENT (HRA)
SCREENING REPORT

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enfusion

Cheltenham Borough Council

Cheltenham Local Plan: Regulation 19

Habitats Regulations Assessment (HRA) Screening Report

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1.0 Introduction

The Cheltenham Plan & The HRA

1.1 Cheltenham Borough Council is preparing a new Local Plan in consideration of National Planning Policy Framework (NPPF, 2012), changed local circumstances, and the progress of the new Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS). The JCS has been examined and the Inspector's Final Report (October 2017)[1] recently published; this concluded overall that the JCS has been found sound subject to an immediate partial review. The new Local Plan will support the strategic development framework provided by the JCS; it will present a local Vision & Objectives with local policies, focussed on non-strategic allocations, local infrastructure issues, and development management policies relevant to Cheltenham[2]. The Cheltenham Plan will guide development in the local area and will be used in combination with the JCS.

1.2 The Cheltenham Local Plan was being prepared in two parts. Part One provided a local economic strategy and economic development policies, local infrastructure policies (particularly focussing on local green space) with housing and mixed-use non-strategic allocations. Part One was subject to a Preferred Options consultation (February – March 2017) and built upon the earlier Issues & Options work and was subject to initial HRA Screening (October 2016).

1.3 The Cheltenham Local Plan is now combining Part One and Two. The next stage of plan-making comprises the Draft Local Plan Regulation 19. This includes the topics covered in the Preferred Options document as well as updated detailed development management policies addressing local issues such as heritage and conservation areas, retailing, urban green environment, natural environment, culture and recreation, housing standards and countryside policies[3]. This HRA Screening Report updates the previous HRA screening to take into account changes in site allocations and the implications from the development management policies.

1.4 Enfusion Ltd, specialists in SA/SEA & HRA, were commissioned to progress the Habitats Regulations[4] Assessment (HRA) of the Cheltenham Local Plan on behalf of the Council in their role as the competent authority. HRA is a process that assesses the likely significant effects (individually and in-combination) of proposed development on EU designated sites; it is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites[5].

[1] https://jointcorestrategy.org/examination#main-modifications-evidence-base-and-examination-documents
[2] https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan
[3] Ibid
[4] The Conservation of Habitats and Species Regulations 2010 (as amended). Online at: http://www.legislation.gov.uk/uksi/2010/490/contents/made [October 2016]
[5] These include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

1.5 At the same time, Enfusion has been undertaking the Integrated (Sustainability) Appraisal (incorporating Strategic Environmental Assessment, Equalities Impact Assessment and Health Impact Assessment) of the emerging draft Cheltenham Plan; this work has been undertaken concurrently, with the findings from the two processes informing each other as appropriate.

Context: GCT JCS & The Cheltenham Plan

1.6 Cheltenham Borough Council, in partnership with Gloucester City Council and Tewkesbury Borough Council, have produced a Joint Core Strategy[6] (JCS) that sets out the strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period to 2031) sets out the housing and employment needs for the Cheltenham area, the strategic direction for development growth, and strategic policies to guide development. The Cheltenham Plan covers the administrative area of Cheltenham Borough and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance[7].

1.7 The GCT JCS identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031; 10,917 of these dwellings are identified to meet the needs of the Cheltenham area. Cheltenham cannot meet its housing needs within its administrative boundaries, and therefore, the JCS has identified a number of urban extensions/strategic allocations to help meet the area's need. The JCS Strategic Allocation North West Cheltenham (A5) were found sound by the Inspector[8] subject to retention of a green buffer around Swindon village to be detailed in the Local Plan; also, the Strategic Allocation West Cheltenham (A11) was found sound. The Strategic Allocation for Leckhampton (A6) was found to be unsound but the Inspector advised that is could be suitable for a non-strategic allocation in the Cheltenham Plan if a Local Green Space was designated within the site area. These strategic sites provide strategic allocations totalling 5,385 new homes through the JCS for the Cheltenham area.

1.8 The GCT JCS was subject to HRA (Submission May 2014, Modifications Update October 2016)[9]; the SA and HRA were found through examination to have met their legal requirements. The HRA concluded that the proposed modifications to the JCS (as consulted upon) would not have any adverse effects, alone or in-combination, on the integrity of the identified European sites. This HRA of the Cheltenham Local Plan has to be considered within the strategic context of the HRA of the JCS, and including discussions held during the examination of the JCS.

[6] https://jointcorestrategy.org/
[7] National Planning Policy Framework (March 2012) Online at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [August 2016]
[8] https://jointcorestrategy.org/examination
[9] https://jointcorestrategy.org/examination

1.9 The Cheltenham Plan allocates the remainder of the identified housing need through local sites, and provides local planning policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period. The Council made a 'call for sites' that may be suitable for future development with a closing date of 23 October 2017. Potential site options were investigated through the Council's site assessment process and all reasonable options (ie realistic and deliverable) were tested through the SA process (SA Report, October 2016); proposed site allocations were screened through the HRA process (HRA Report, October 2016).

1.10 As a result of comments received to the consultation on the Part One Plan Preferred Options earlier in 2017, amendments were made including changes to the allocated sites. This updated HRA screening has considered the likely effects of these changes and the effects of the draft Plan as now presented for Regulation 19 consultation.

Consultation

1.11 The Habitats Regulations require the plan making/competent authority to consult the appropriate nature conservation statutory body - Natural England (NE) for plans in England. NE was consulted on the draft HRA Screening Report that accompanied the Part One Draft Plan on wider consultation. The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. In addition to the statutory consultation undertaken with the appropriate nature conservation body, the draft HRA Screening Report was available for wider public consultation alongside the Cheltenham Plan Part One for 6 weeks from 6 February to 20 March 2017.

1.12 Only one representation was received on the initial HRA Screening Report (2016) – from the statutory body Natural England. All comments received and responses made on the HRA and SA Reports are collated and presented in Appendix V of the Regulation 19 SA Report (November 2017). NE does not agree with the conclusion of no likely significant effects with regard to the Cotswold Beechwoods Special Area of Conservation (SAC). The Cheltenham Plan area is approximately 5km from the Cotswold Beechwoods SAC. Whilst NE noted that the majority of the site allocations are over 10km from the Cotswold Beechwoods SAC, as yet they suggest that there is no strategic understanding of where visitors come from and how they use the SAC, no established zone of influence for recreational pressure and no mitigation plan. In combination impacts must also be considered. Without this information, NE consider it is not possible to reach a conclusion of no likely significant effects from the Cheltenham Plan based on distance alone.

1.13 NE welcomed the draft plan's Local Green Space policy, particularly the identification of sites for Local Green Space Designation. However, NE considered that these local green spaces cannot be assumed to provide mitigation for recreational pressure on the SAC; the sites are local rather than strategic and have not been assessed or selected with this purpose in mind. In addition, there is an emphasis on the protection of existing sites rather than

their improvement or the creation of new sites to absorb the additional need generated through growth. NE therefore, did not agree with the HRA's conclusion that the green space policies mitigate against additional recreational pressure on the Cotswold Beechwoods SAC to allow a conclusion of no likely significant effects.

1.14 Since NE's comments (March 2017) on the initial HRA Screening Report for the Cheltenham Plan Preferred Options, further discussions have been held between the JCS authorities and NE regarding the HRA of the JCS. The JCS and its accompanying SA and HRA have been found sound and legally compliant (October 2017). Therefore, the updated situation has been taken into account in responding to NE's concerns on the Cheltenham Plan – and that the Regulation 19 Plan includes relevant development management policies.

1.15 This further HRA Screening Report assesses the draft Cheltenham Plan and builds upon the initial HRA screening work. The HRA Report will accompany the Regulation 19 Plan on consultation during January – February 2018. Any comments received will be considered in the preparation of the Plan that will be submitted to the Secretary of State for independent examination later in 2018.

Purpose & Structure of Report

1.16 This report documents the process and the findings of the HRA screening for the Regulation 19 draft Cheltenham Plan. Following this introductory section, the document is organised into a further three sections:

- Section 2 summarises the requirements for HRA, the methods used, and the background to the Cheltenham Plan.
- Section 3 outlines the screening process and the findings of the screening assessment with technical details presented in the Appendices I-III.
- Section 4 summarises the findings of the HRA and explains the next steps.

Details are provided in technical appendices. Appendix I summarises the relevant European Site Characterisations; Appendix II provides a review of relevant plans, programmes and projects; and Appendix III systematically demonstrates the HRA screening of likely significant effects (LSEs) against the Regulation 19 Plan Policies and Site Allocations.

2.0 Habitats Regulations Assessment & the Draft Plan

Requirements for Habitats Regulations Assessment

2.1 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan (either alone or in-combination with other plans and projects) against the conservation objectives of any site designated for its nature conservation importance.

2.2 The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive] which aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In addition, Government guidance[10] also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process as required by the Regulations.

2.3 The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the impacts of a land-use plan, when considered individually or in combination with the effects of other plans and projects against the conservation objectives of a European Site, would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

Guidance & Good Practice

2.4 The application of HRA to Local Plans has been informed by a number of key guidance and practice documents. Guidance for HRA was published by the Government[11] based on the European Commission's (2001) guidance for the Appropriate Assessment (AA) of Plans. The Governments guidance recommends three main stages to the HRA process:

- **Stage 1**: Screening for Likely Significant Effect
- **Stage 2:** Appropriate Assessment, Ascertaining Effects on Integrity
- **Stage 3**: Mitigation Measures and Alternatives Assessment

[10] DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas - core guidance for developers, regulators & land/marine managers
[11] DCLG, 2006, Planning for the Protection of European Sites: Appropriate Assessment

2.5 If alternative solutions or avoidance/ mitigation measures to remove adverse effects on site integrity cannot be delivered, then current guidance recommends an additional stage to consider Imperative Reasons of Overriding Public Interest (IROPI) for why the plan should proceed. For the HRA of land use plans, IROPI is only likely to be justified in a very limited set of circumstances and must be accompanied by agreed, deliverable compensation measures for the habitats and species affected. Since the HRA of the GCT JCS did not identify any potential residual adverse effects, this additional stage is not needed for this lower level local plan and is not considered any further in this report.

2.6 More recently, the nature conservation regulator Natural England has produced additional, detailed guidance[12] on the HRA of Local Plan documents that complements the DCLG guidance, and builds on assessment experience and relevant court rulings. In 2012, DEFRA published a Core Guidance[13] document relating to the Habitats & Wild Birds Directive, providing information on decision making and the HRA process for developers, regulators and land/marine managers.

2.7 Significant effects on European sites are often associated with disturbance and increased emissions from increased traffic arising from new development; this can often be associated with increased recreational pressures. In recognition of the role of traffic emissions and HRA, the joint Air Quality Technical Advisory Group (AQTAG – Environment Agency, Natural England, Natural Resources Wales) published guidance[14] regarding HRA in-combination assessment, defining likely significant effect thresholds for industrial installations and emissions to air. The Design Manual for Roads & Bridges (DMRB) Volume 11[15] provides guidance on environmental assessment including implications for European Sites (Section 4).

2.8 DMRB advises that where annual average daily traffic movements (AADT) resulting from development do not exceed 1000 on affected roads, environmental effects may be regarded as neutral and scoped out of any further assessment. The AQTAG21 guidance relied upon by NE and prepared by the AQTAG asserts that the 1000 AADT threshold equated to a 1% change in critical loads/levels relating to an identified pollutant which, if not exceeded, allowed the decision-maker to conclude that there would be no likely significant effect. Advice from NE further asserted that it was unlikely that a substantial number of plans or projects will occur in the same area at the same time, such that their in-combination impact would give rise to concern at the appropriate assessment stage.

[12] Tyldesley, D., 2009, The Habitats Regulations Assessment of Local Development Documents (Natural England)
[13] DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas- Core guidance for developers, regulators & land/marine managers
[14] http://www.midsussex.gov.uk/media/78886/189_wealdenappendixb.pdf
[15] http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/index.htm

2.9 In a recent court case[16], Wealden District Council argued that whereas its Core Strategy (WCS) had been prepared on the basis that it would generate 950 AADT on part of the A26 road next to the SAC, the effect of the JCS would be to increase the AADT beyond the 1000 threshold and on a proper interpretation of the DMRB, this required an in-combination assessment of the effects of both the Wealden Core Strategy and the JCS – which had not been carried out in the HRA of the JCS. Lewes DC and the SDNPA argued that no in-combination assessment was required because the JCS on its own involved the generation of traffic below the threshold and no further in-combination assessment was required.

2.10 The Judge found that on a proper interpretation of the DMRB, in-combination effects are potentially relevant at the initial scoping stage as well as at the subsequent further assessment stage. He also found that there was no explanation for not aggregating the two amounts such that the AADTs from both plans (WCS & SDNPA JCS) should have been taken into account; the 1000 AADT threshold would be exceeded and thus then require an in-combination assessment.

2.11 The Proposed JCS Modifications accompanied by the SA Addendum Report (2016) incorporating the updated HRA findings were subject to statutory consultation between 27 February and 10 April 2017. Representation from Natural England (NE) advised the JCS Authorities that they should seek their own legal advice in consideration of this recent High Court Judgment that found advice from Natural England on the in-combination of air quality impacts (based on nationally developed guidance) to be flawed.

2.12 The case concerned the approach to assessment of in-combination effects with regard to vehicle emissions and nitrogen deposition effects on heathland habitat in the Ashdown Forest SAC. The outcome was that part of the Lewes JCS (prepared by LDC & the SDNPA) was quashed. Natural England has been required to reconsider its advice regarding in-combination assessment and Highways England has been required to re-examine its Design Manual for Roads & Bridges (DRMB). An HRA Note (July 2017) was prepared to explain the situation with this advice and the HRA of the GCT JCS; the findings of the strategic level HRA of the GCT JCS reported in 2013-4, 2015 and 2016 remain relevant and valid. The HRA of the GCT JCS has been found sound and legally compliant (October 2017).

2.13 The JCS Authorities will continue to monitor air quality, undertake further studies as necessary, and continue to liaise closely with the relevant regulator Natural England to ensure that implications for the Cotswolds Beechwoods SAC and HRA are addressed. They will monitor any future developments in guidance from NE and HE that arise from the Wealden Judgment recommendations and adjust studies accordingly. This situation with guidance provided by the regulators has been taken into account with the HRA of the Cheltenham Plan.

[16] http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html

Method

2.14 The approach taken for the HRA of the Cheltenham LP follows the method set out in the formal guidance documents. The key stages of the HRA process and the specific tasks undertaken for each stage are set out in Table 2.1.

Table 2.1: HRA Key Stages:

Stages	Habitats Regulations Assessment
Stage 1: Screening for Likely Significant Effects	1. Identify European sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the European site(s) potentially affected.
	3. Analyse the policy/ plan and the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects on European sites (magnitude, duration, and location) based on best available information.
	4. Examine other plans and programmes that could contribute (cumulatively) to identified impacts/ effects.
	5. Produce screening assessment based on evidence gathered and consult statutory nature conservation body on findings.
	6. If effects are judged likely or uncertainty exists – the precautionary principle applies proceed to Stage 2.
Stage 2: Appropriate Assessment	1. Agree scope and method of Appropriate Assessment with statutory nature conservation body.
	2. Collate all relevant information and evaluate potential impacts on site(s) in light of conservation objectives.
Stage 3: Mitigation Measures and Alternatives Assessment	1. Consider how effect on integrity of site(s) could be avoided by changes to plan and the consideration of alternatives (e.g. an alternative policy/ spatial location). Develop mitigation measures (including timescale and mechanisms for delivery).
	2. Prepare HRA/ AA report and consult statutory body.
	3. Finalise HRA/AA report in line with statutory advice to accompany plan for wider consultation.

The Draft Cheltenham Plan

Aims & Objectives

2.15 The Cheltenham LPs vision is divided into 3 separate themes. Under each theme are a collection of objectives to help achieve the desired vision. The vision and corresponding objectives will help shape what the Cheltenham LP will deliver over the plan period. The 3 vision themes and their resultant objectives can be found in Table 2.2.

Table 2.2: The Cheltenham Plan Vision & Objectives

Vision	Objectives
A place where people live in strong, safe, healthy, well-served and well-connected communities.	▪ Recognise the local distinctiveness of Cheltenham's various neighbourhoods, promoting their integration and regeneration where appropriate

	▪ Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population ▪ Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation ▪ Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities ▪ Increase opportunities for sport and active leisure, particularly in areas of under-provision ▪ Ensure that places are designed in a way that is accessible to all and where barriers to walking and cycling are removed so that active travel and public transport are the default choices ▪ Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities ▪ Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime ▪ Improve health outcomes by promoting and prioritising active travel.
A place with a prosperous and enterprising economy where employment opportunities are increasing and diversifying, and where the benefits are felt by all	▪ Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham ▪ Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact ▪ Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres ▪ Deliver a range of sustainable transport choices through appropriate infrastructure improvements including better cross-town and local links, prioritised junctions, and improved public transport. ▪ Encourage knowledge-intensive services businesses in high value sectors; ▪ Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities.
A place where the quality and sustainability of our cultural assets and natural and built	▪ Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas

environment are valued and recognised locally, nationally and internationally	▪ Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the borough maintains its reputation as a cultural destination and continues to be an attractive place to visit ▪ Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term ▪ Create a walkable network of interconnected, multifunctional green spaces that link with the wider countryside ▪ Support provision, maintenance and continued investment in a high-quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity ▪ Manage and reduce the risk of flooding within the borough

Level and Distribution of Growth

2.16 Taking into account the likely employment and housing needs, the emerging GCT JCS identified a preferred strategy for distributing development through an Urban Focus. This means that the development will be distributed in the existing urban areas mainly in Gloucester, Cheltenham and Tewkesbury and in urban extensions and strategic allocations.

2.17 The JCS sets out that 10,917 new houses have been allocated to meet the needs of Cheltenham. Two urban extensions/strategic allocations have been allocated to accommodate a proportion of this growth – A5 North-West Cheltenham (4285 dwellings) and A11 West Cheltenham (1,100 dwellings). The remaining development needs will be met through smaller local development locations within Cheltenham. The developing JCS was subject to HRA which concluded that the submission JCS and main modifications will not have adverse effects, alone or in-combination, on the integrity of the identified European sites. The JCS HRA was found to be legally compliant and the JCS was adopted in November 2017.

Site Allocations & Local Policies

2.18 The Cheltenham Plan comprises chapters including the Local Policies and Site Allocations, as follows:

- Introduction
- Vision and Objectives
- Scale & Distribution of New Development JCS Policies SP1-2
- Employment – JCS SD2; Local Policies EM1-6
- Design Requirements -JCS Policy SD5; Local Policies D1-D3
- Green Belt – JCS Policy SD6; Local Policies GB1-2
- Landscape – JCS Policy SD7; Local Policy L1

- Cotswold Area of Outstanding Beauty – JCS Policy SD8
- Historic Environment – JCS Policy SD9; Local Policies HE1-5
- Biodiversity and Geodiversity – JCS Policy SD10
- Health and Environmental Quality – JCS Policy SD15; Local Policy SL1
- Housing Mix and Standards – JCS Policy SD12; Local Policies HM1-4
- Gypsies, Travellers and Travelling Showpeople – JCS Policy SD14; Local Policy GT1
- Green Infrastructure – JCS Policy INF4; Local Policies GI1-3
- Renewable Energy and Low Carbon Energy Development – JCS Policy INF6
- Retail and City/Town Centres – JCS Policy SD3
- Social and Community Infrastructure – JCS Policy SD5; Local Policies CI1-4
- Transport Network – JCS Policy INF1; Local Policies TN1-2
- Residential Development – JCS Policy SD11; Local Policies H1-2

3.0 Screening

The JCS HRA (2013)

3.1 The emerging GCT JCS (2013) has set the overall level of growth and a HRA was undertaken during its preparation. The HRA screening of the JCS found that for 12 of the 13 identified European sites there would be no significant effects, although there was some uncertainty regarding the in-combination effects on 7 European sites as a result of changes to Air Quality, Disturbance and Water Levels & Quality. There was also uncertainty around the significant impacts that short range atmospheric pollution might have on the Cotswolds Beechwoods SAC. Therefore, an Appropriate Assessment (AA) was undertaken to gain a more detailed understanding of the possible significant impacts which may occur.

3.2 The AA made a number of recommendations to ensure potential impacts on European sites did not occur, including conducting a transport assessment and a water cycle study, and strengthening the flooding policy. Overall the HRA concluded that with consideration to the recommendations provided, the Draft JCS would not have significant alone or in combination effects on the integrity of the identified European sites. There was some uncertainty raised during consultation and examination by Natural England regarding the potential recreational impacts on the Cotswolds Beechwoods SAC and proposed mitigation measures. However, this has now been resolved through a HRA Addendum Report[17] (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and the environmental regulator, Natural England. No further concerns on the HRA have been raised during the initial stages of the examination of the JCS and therefore, it can be concluded that the strategic development proposed for Cheltenham in the JCS will not have adverse effects on the identified European sites.

Screening the Draft Cheltenham Plan 2016

3.3 Three European sites were found to be within 15km of the Cheltenham Borough administrative boundary, and therefore were scoped into the HRA for the Cheltenham Plan and as detailed in Appendix I of this HRA Report. The European sites that have been included are listed below:

- Bredon Hill SAC
- Cotswolds Beechwoods SAC
- Dixton Woods SAC

[17] http://www.gct-jcs.org/Documents/Examination-Document-Library/SAPR119A-HRA-Addendum-Cotswold-Beechwoods.pdf

Characterisation of European Sites

Table 3.1: European Sites Characterisation

Bredon Hill SAC
Bredon Hill is an area of pasture woodland and ancient parkland. The site provides habitat for the Violet Click Beetle Limoniscus violaceus beetle, which develops in the decaying wood either of very large, old hollow beech trees (Windsor Forest) or ash trees (Worcestershire/Gloucestershire border sites). Currently the only site attributes which Natural England understands the species to need is related to the abundance and condition of the ancient trees within which it develops.
Cotswolds Beechwoods SAC
The Cotswolds Beechwoods SAC is the most westerly block of *Asperulo-Fagetum* beech forests in the UK. The woods are structurally varied with blocks of high forest and areas of remnant Beech Coppice. The area is designated as a SAC due to the presence of both *Asperulo-Fagetum* Beech forests and semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*). The site has a number of vulnerabilities including recreational activities and invasive non-native species.
Dixton Woods SAC
Dixton Wood is an area of broadleaved woodland (formerly partially grazed) with a dominance of ash including exceptionally large ancient pollards. The site is designated for its population of Violet Click Beetle *Limoniscus violaceaus*, which is largely dependent on these pollards (for breeding). Principal risks to the site's integrity are lack of future replacement pollards (age-class skewed to older generation) and game management practices.

Other Plans and Programmes

3.4 A review of other plans and programmes in and around the Cheltenham plan area was conducted to consider the potential for significant in-combination effects. The review found that a number of existing plans could have a variety of in-combination effects with the Draft Cheltenham Plan and as detailed in Appendix II of this HRA Report. These potential significant effects include impacts on air pollution through increased traffic and increased levels of disturbance through recreational activities, together with noise and light pollution.

The Effects of The Plan (Updated 2017)

3.5 The Draft Cheltenham Plan proposes a number of local sites for development and a number of policies to guide development. Housing, employment and infrastructure development has the potential to generate a range of environmental effects that could have impacts on European sites. These types of effects and impacts that can arise from housing and employment development are summarised in Table 3.3 below.

Table 3.3: Housing, Employment and Infrastructure Development - Possible Effects & Impacts on European Sites

Effects on European Sites	Impact Types
Habitat (& species) fragmentation and loss	Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations) Introduction of invasive species (predation)
Disturbance	Increased recreational activity (population increase) Noise and light pollution (from development and increased traffic)
Changes to hydrological regime/ water levels	Increased abstraction levels (new housing) Increased hard standing non-permeable surfaces/ accelerated run-off Laying pipes/ cables (surface & ground) Topography alteration
Changes to water quality	Increase in run-off/ pollutants from non-permeable surfaces (roads, built areas) Increased air pollution (eutrophication) (traffic, housing) Increased volume of discharges (consented)
Changes in air quality	Increased traffic movements Increased emissions from buildings

3.6 The first stage in the screening process considered the likely significant effects (LSEs) arising from implementation of the policies and proposed local sites - and whether these have the potential to lead to potential impacts. The screening identified that given the distance from European sites and the lack of environmental pathways none of the Cheltenham Plan Part One Preferred Options' policies and none of the proposed local site allocations would lead to any significant effects on European sites (HRA Screening Report October 2016) and Appendix III of this HRA Report.

3.7 Most Draft Local Policies in the Preferred Options were focused on safeguarding and protecting existing land and did not propose any development. These were screened and were found to not result in any LSEs. There were three draft local policies proposing development with specific site allocations for residential, mixed and employment land use. These 3 policies were considered to potentially result in LSEs due to the development they were proposing, and so the next step taken was to assess the proposed sites.

3.8 Overall there were 17 sites proposed in 3 policies and the screening of these sites indicated that there were no environmental pathways found for LSEs to occur. Almost all of the proposed development sites were over 10km away from the identified European site and located in urbanised areas. Given this distance and the Cheltenham Plan and JCS Polices that seek to ensure sufficient green space allocations within the Plan area to support new development, it was considered unlikely that recreational impacts on the European sites would be of significance. The lack of any identified

environmental pathways for LSEs to occur indicated that the 3 policies relating to development will not lead to any significant effects occurring alone on identified European sites.

3.9 Comments received on the Preferred Options Part One consultation (February – March 2017) were taken into account in developing the next stage of the Plan – Regulation 19. The Regulation 19 Plan included refinements to the Vision & Objectives, which are not significant with regard to the HRA Screening. Additional development management policies to guide development are included to support the Core Policies in the JCS – and including JCS Policy SD10 Biodiversity & Geodiversity that ensures that new development both within and surrounding internationally, nationally and locally designated sites has no unacceptable adverse impacts. These development management policies do not in themselves lead to development and therefore are not considered to lead to LSEs.

3.10 The previous Local Policies proposing land allocated for housing and mixed-use development have been renamed Policy H1-2 and include the same site allocations but updated to reflect changes since consultation in early 2017. The previous findings of the HRA screening remain relevant and valid for the site allocations previously considered (Appendix III of this HRA Report). New site allocations have been included in the updated Plan as follows:

- Brockhampton Lane in Local Policy H1, now included in the site allocations as the threshold for minimum yield has been changed from 30 to 20 units
- Stone Crescent in Local Policy H1, now included in the site allocations as the threshold for minimum yield has been changed from 30 to 20 units

These new small local sites are over 10km from the Beechwoods SAC and, as with the other local site allocations, will not lead to any significant effects occurring alone on the identified European sites – and with particular consideration of the Beechwoods SAC to the south (Appendix III).

In-Combination Effects (Updated 2017)

3.11 Relevant plans and programmes were screened to consider the possible in-combination effects they may have with the Cheltenham LP. A number of the screened plans and programmes were found to potentially have an effect on European Sites through increased atmospheric pollution and recreational activity.

3.12 The proposed green space local policies for the Cheltenham Plan address the protection and development of green spaces within Cheltenham. This provision should ensure sufficient recreation space is provided within the borough boundary for existing and future local residents and prevent any significant additional recreational pressures on any of the European sites. Therefore, significant effects through recreation activities is unlikely.

3.13 None of the allocated sites within the area are likely to substantially increase traffic on any road which goes within 200 metres of the European sites due to the proposed local site locations within Cheltenham. Therefore, any risk of significant in-combination effects caused by atmospheric pollutants are also considered to be unlikely.

3.14 Furthermore, through work done on the JCS GCT that included consideration of the same plans and programmes for in-combination effects, it was found that policy mitigation provided through the JCS would eliminate any potential significant in-combination effects from occurring. Therefore, the Initial HRA Screening of the Regulation 18 Preferred Options Cheltenham Plan concluded that the Plan would not have significant effects on the identified European sites, along, or in-combination. The changes to the Plan for Regulation 19 are not significant with regard to the HRA screening and therefore it is considered that the HRA findings remain valid.

3.15 The environmental regulator Natural England (NE) commented on the HRA Screening (October 2016) and agreed that the majority of the site allocations are over 10km from the Cotswold Beechwoods SAC. However, there was concern that there is no strategic understanding of where visitors come from and how they use the SAC, no established zone of influence for recreational pressure and no mitigation plan. NE welcomed the plan's Green Space Policy but commented that these local green spaces cannot be assumed to provide mitigation for recreational pressures on the SAC.

3.16 NE concluded that in the absence of visitor surveys, partnership discussions and an agreed mitigation plan, it is difficult to justify a conclusion of no likely significant effects on the Cotswold Beechwoods SAC as a result of the Cheltenham Plan. As a step towards this, they recommended that the plan goes further to secure the delivery of strategic green infrastructure.

3.17 NE further commented that the examination of the JCS considered the issue of recreational impacts on the Cotswold Beechwoods SAC in some detail, through an addendum to its HRA (May 2015) and the subsequent production of a Statement of Cooperation between the JCS authorities and Natural England. All parties agreed that any significant effects of the JCS on the SAC due to increased recreation are capable of being addressed through mitigation. The JCS sets out a possible route for this mitigation, through green infrastructure and developer contributions for site management. It therefore puts the necessary hooks in place to allow this to happen, but further work is required to understand the issue and deliver appropriate mitigation. The HRA Report that accompanied the JCS on examination has been found to be legally compliant and the JCS adopted.

3.17 It is noted the JCS Policy SD10 Biodiversity & Geodiversity with JSC Policy INF4 Green Infrastructure include modifications[18] that have been agreed through consultation and discussion at the final examination stages prior to the adoption of the GCT JCS (November 2017). INF4 confirms that the JCS authorities will work together with key stakeholders, such as Environment

[18] https://jointcorestrategy.org/examination

Agency and Natural England, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this. Thus, the JCS authorities are committed to working in partnership to identify and agree any necessary appropriate mitigation plan to ensure delivery of strategic green infrastructure.

3.18 Cheltenham Borough Council will continue to consider the implications of the Local Sites in the Cheltenham Plan and the need for any visitor surveys to inform the development of any local green infrastructure plan- and in line with ongoing JCS discussions. Thus, the HRA screening continues to conclude that Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.

4.0 HRA Summary, Conclusions & Next Steps

Summary

4.1 This report presents the methods used and the findings arising from the HRA Screening of the Draft Cheltenham Plan. The HRA has been undertaken in accordance with extant guidance and good practice and has been informed by the previous HRA work on the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (GCT JCS).

4.2 The Cheltenham Plan will, alongside the GCT JCS, deliver new housing and employment development to meet the identified needs of the resident populations, and deliver policies to guide and manage future growth over the plan period to 2031. The Cheltenham Plan covers the administrative area of Cheltenham and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance.

4.3 Policies, including those with housing and mixed-use development site allocations, were screened for Likely Significant Effects (LSEs). The screening process indicated that there are no environmental pathways for LSEs alone to occur and that all the sites were located at least more than 8km away from the closest European site. The potential for in-combination effects with other plans and programmes was reviewed, and it was considered that these effects are unlikely to be of significance given policy mitigation proposed through the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (GCT JCS) and the Cheltenham Plan.

4.4 The concerns of the environmental regulator Natural England have been taken into account in progressing this draft of the Cheltenham Plan and the updated HRA Screening. The JCS is now adopted (November 2017) and includes modifications to Policies SD10 & INF4 that confirm there will be no adverse impacts and that the JCS authorities will work in partnership to develop management and mitigation packages for strategic green infrastructure. Cheltenham Borough Council will continue to consider the implications of the Local Sites in the Cheltenham Plan and the need for any visitor surveys to inform the development of any local green infrastructure plan - and in line with ongoing JCS discussions.

Conclusion

4.5 Thus, the HRA screening continues to conclude that the Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.

Consultation and Next Steps

4.6 These HRA findings will be subject to further consultation as the updated HRA Report accompanies the draft Cheltenham Plan on Regulation 19 consultation. Any further comments received on the HRA will be taken into

account prior to submission to the Secretary of State for independent examination in 2018. It may be noted that the findings of this plan level HRA do not obviate the need to undertake HRA for lower level, project scale/implementation plans where there is potential for significant effect on one or more European sites. The findings of this plan HRA should be used to inform any future assessment work.

Any comments on the HRA Screening should be made through the Council's website:

https://www.cheltenham.gov.uk/

Appendix I: European Site Characterisations

- Bredon Hill SAC
- Cotswold Beechwoods SAC
- Dixton Woods SAC

Special Areas of Conservation

Site Name: Bredon Hill **Location Grid Ref: SO965406** **JNCC Site Code: UK0012587** **Size: 359.86ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	Bredon Hill is an area of pasture woodland and ancient parkland. The site provides habitat for the Violet Click Beetle *Limoniscus violaceus* beetle, which develops in the decaying wood either of very large, old hollow beech trees (Windsor Forest) or ash trees (Worcestershire/Gloucestershire border sites). Currently the only site attributes which Natural England understands the species to need is related to the abundance and condition of the ancient trees within which it develops.
Qualifying Features	Annex II Species primary reason for selection: ▪ Violet Click Beetle (*Limoniscus violaceus*)
Conservation Objectives	With regard to the natural habitats and/or species for which the site has been designated (the Qualifying Features" listed below); Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features. Subject to natural change, to maintain or restore: ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species; ▪ The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species; ▪ The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; ▪ The populations of qualifying species; ▪ The distribution of qualifying species within the site. Qualifying Features:

Site Name: Bredon Hill **Location Grid Ref: SO965406** **JNCC Site Code: UK0012587** **Size: 359.86ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
	S1079. Limoniscus violaceus; Violet click beetle
Vulnerabilities (includes existing pressures and trends)	Negative Impacts ▪ Lack of a replacement generation of trees- High-Inside. (For the current ancient trees over much of the hill, as many of the younger trees have been removed to increase stock grazing areas; the overall number of ancient trees suitable for *Limoniscus violaceus* is relatively small). ▪ Acid and nitrogen deposition ▪ Changes in abiotic conditions- High- Both ▪ Interspecific Floral relations- High- Inside ▪ Air Pollution, air-borne pollutants- High-Both It is very important that no attempt should be made to measure the population size of this species directly, as methods currently available to find the species lead to destruction of its habitat.

Site Name: Cotswolds Beechwoods **Location Grid Ref: SO898134** **JNCC Site Code: UK0013658** **Size: 585.85ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	The Cotswold Beechwoods represent the most westerly extensive blocks of *Asperulo-Fagetum* beech forests in the UK. The woods are floristically richer than the Chilterns, and rare plants include red helleborine *Cephalanthera rubra*, stinking hellebore *Helleborus foetidus*, narrow-lipped helleborine *Epipactis leptochila* and wood barley *Hordelymus europaeus*. There is a rich mollusc fauna. The woods are structurally varied, including blocks of high forest and some areas of remnant beech coppice.
Qualifying Features	Annex I habitats primary reason for selection: ▪ *Asperulo-Fagetum* beech forests Annex I habitats qualifying feature: ▪ Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*)
Conservation Objectives	With regard to the natural habitats and/or species for which the site has been designated (the Qualifying Features" listed below); Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats ▪ The structure and function (including typical species) of qualifying natural habitats, and ▪ The supporting processes on which qualifying natural habitats rely Qualifying Features: H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia); Dry grasslands and scrublands on chalk or limestone H9130. Asperulo-Fagetum beech forests; Beech forests on neutral to rich soils

Site Name: Cotswolds Beechwoods **Location Grid Ref: SO898134** **JNCC Site Code: UK0013658** **Size: 585.85ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Vulnerabilities (includes existing pressures and trends)	Negative Impacts: ▪ Outdoor sports and leisure activities, recreational activities: High- Inside ▪ Interspecific floral relations: High- Inside ▪ Problematic native species: High- Both ▪ Invasive non-native species: High- Both

Site Name: Dixton Woods **Location Grid Ref: SO979313** **JNCC Site Code: UK0030135** **Size: 13.14 ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Site Description	Dixton Wood is an area of broadleaved woodland (formerly partially grazed) with a dominance of ash including exceptionally large ancient pollards. The site is designated for its population of Violet Click Beetle *Limoniscus violaceaus*, which is largely dependent on these pollards (for breeding). Principal risks to the site's integrity are lack of future replacement pollards (age-class skewed to older generation) and game management practices.
Qualifying Features	Annex II species primary reason for selection: ▪ Violet click beetle *Limoniscus violaceus*
Conservation Objectives	With regard to the natural habitats and/or species for which the site has been designated (the Qualifying Features" listed below); Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features. Subject to natural change, to maintain or restore: ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species; ▪ The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species; ▪ The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; ▪ The populations of qualifying species; ▪ The distribution of qualifying species within the site. Qualifying Features: S1079. *Limoniscus violaceus*; Violet click beetle

Site Name: Dixton Woods **Location Grid Ref: SO979313** **JNCC Site Code: UK0030135** **Size: 13.14 ha** **Designation: SAC**	**Habitats Regulations Assessment: Data Proforma**
Vulnerabilities (includes existing pressures and trends)	Negative Impacts: ▪ Changes in Biotic Conditions- High- Both ▪ Forest & Plantation Management and use- Inside- Both ▪ Interspecific floral relations- Inside- Both

Appendix II: Plans and Programmes Review

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
JCS Gloucester, Cheltenham and Tewkesbury (November 2014 & found sound in October 2016 after examination)	• 30,500 to 38,00 dwellings • The housing requirement for each local authority will be as follows: - Gloucester: 11,300 new homes - Cheltenham: 9,100 new homes - Tewksbury: 10,100 new homes 28,000 jobs with 64 hectares of employment land	• Proposed housing, employment and infrastructure development has the potential to: increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase pressure on sewerage capacity; increase water abstraction; result in the loss of supporting habitat and modify drainage. • The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan: ▪ atmospheric pollution through increased traffic, which could reduce air quality ▪ increased levels of disturbance - recreational activity, noise and light pollution, potential for increased disturbance to mobile species; and ▪
Draft Tewkesbury Borough Local Plan (October 2016)	• Plan period till 2031 • 8565 new dwellings • New jobs and employment Land	• The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan: ▪ atmospheric pollution through increased traffic, which could reduce air quality ▪ increased levels of disturbance - recreational activity, noise and light pollution, potential for increased disturbance to mobile species; and
Cotswold District Local Plan (June 2016)	• Plan period till 2031 • 8,400 new dwellings • 27 hectares of land for B-Class employment use resulting in around 1,500 to 11,900 new jobs	• The HRA for the plan concluded, through the use of Appropriate Assessment, that any likely significant effects on European sites could be ruled out. • The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan: ▪ atmospheric pollution through increased traffic, which could reduce air quality;

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
		▪ increased levels of disturbance - recreational activity, noise and light pollution; and ▪
Stroud Local Plan November 2015	• 3615 new dwellings • 6,600-12,500 jobs with new employment land allocations and support for further town centre and retail floorspace to meet needs up to 2031 • Strategic sites: 1. Hunts Grove Extension 750 2. North East Cam 450 3. Sharpness 300 4. Stroud Valleys 450 5. West of Stonehouse 1350	• The HRA including an appropriate assessment identified three European sites for further investigation: • Severn estuary SAC, SPA & Ramsar – air quality, recreational pressure water supply and wastewater treatment. • Rodborough Common SAC – air quality and recreational pressure. • Cotswold Beechwoods SAC – air quality and recreational pressure. With mitigation suggested in the HRA it was concluded that there would be an appropriate policy mechanism in place to ensure that adverse effects on the integrity of the three sites mentioned above could be avoided. • The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan: ▪ atmospheric pollution through increased traffic, which could reduce air quality; ▪ increased levels of disturbance - recreational activity, noise and light pollution; and
Gloucestershire LTP3 2015 - 2031	• Major road and transport schemes/ interchanges	• Proposed transport infrastructure could increase disturbance (recreational, noise, light); increase atmospheric pollution (diffuse); increase transfer of pollutants through surface water run-off; result in the loss of supporting habitat and modify drainage. • Potential for in-combination effects will be considered through the HRA for the Draft Cheltenham Borough Local Plan.

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
Gloucestershire Minerals Core Strategy Preferred Options (February 2015)	• 7 strategic objectives make up the preferred option and are fall within themes. • The MCS identifies the following resource areas, which are of relevance: • The Cotswolds - provides limestone used as a crushed rock and building stone and clay for brick-making; • The Severn Vale Corridor - also encompasses sand & gravel for aggregate use; and clay for engineering projects.	• The MCS identifies the potential outward supply opportunity of crushed rock into Wales and the West Midlands. This could have the potential to have in-combination effects through increased transport and associated impacts/ pollution incidents. • The MCS also identifies the provision potential of the Severn Vale Corridor resource area to provide potential new site allocations for sand and gravel working. • The HRA for the Preferred Options acknowledged that there are uncertainties surrounding the minerals provision in Gloucestershire. • The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan: ▪ atmospheric pollution through increased traffic, which could reduce air quality; ▪ increased levels of disturbance - noise and light pollution; and ▪ increased levels of abstraction; surface water run-off and sewerage discharge, which could reduce water quality and levels.
Gloucestershire Waste Core Strategy Adopted (Nov 2012)	• The Waste Core Strategy (WCS) provides the framework for sustainable waste management in the County. • The CS states that Planning permission will be granted for strategic residual recovery facilities (>50,000 tonnes/year) at the following sites: • 1. Wingmoor Farm East • 2. The Park • 3. Wingmoor Farm West • 4. Javelin Park • 5. Land at Moreton Valence	• The HRA concluded that the WCS and associated policies will have no likely significant effects alone or in-combination on any European designated sites for nature conservation. • The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan: ▪ atmospheric pollution through increased traffic, which could reduce air quality; ▪ increased levels of disturbance - noise and light pollution; and

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
JCS Strategic Flood Risk Assessment	• The Strategic Flood Risk Assessment is designed to guide development of the JCS towards areas of lowest flood risk.	• Potential in-combination effects are considered in section 4 of the HRA report
Severn Estuary River Basin Management Plan	• Proposals relating to the Severn Estuary and its related pressures.	• The potential for this plan to improve the habitat quality for this European site will have a bearing on the future potential impact of policies and the baseline against which it is measured. • A Habitats Regulations Assessment of this plan has been carried out to consider whether it is likely to have a significant effect on any Natura 2000 sites. The assessment was undertaken by the Environment Agency, in consultation with Natural England and the Countryside Council for Wales. • The assessment concluded that the River Basin Management Plan is unlikely to have any significant negative effects on any Natura 2000 sites and that Plan itself does not require further assessment under the Habitats Regulations. This conclusion is reliant on the fact that before any measures in the Plan are implemented they must be subject to the requirements of the Habitats Regulations. Any plans, project or permissions required to implement the measures must undergo an appropriate assessment if they are likely to have a significant effect.
Severn Trent Water Resource Management Plan Final Version (2014)	• The WRMP sets out Severn Trent Water's strategy for ensuring the security of water supplies between 2010 and 2035.	• The HRA of the WRMP identified that based on the current level of detail available for the final WRMP schemes; it is unlikely that there will be any significant impact on Natura 2000 or Ramsar sites. However, all schemes that were identified within the HRA screening process as having the potential to have a significant effect will be subject to further screening at project design to determine whether, based on the additional design information, the scheme could have a likely significant effect. Any scheme that could have an adverse effect on the integrity of a European or International site will not be in accordance with the objectives of our WRMP and will not be taken forward.

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
Development associated with the decommissioning of Berkeley Power Station	• The station is now proceeding through a measured and calculated programme of work to decommission the site.	• There may be impacts on air quality and nutrient enrichment • The demolition of structures may create dust which could have a smothering effect on sites • The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan: ▪ atmospheric pollution through increased traffic, which could reduce air quality; ▪ increased levels of disturbance - noise and light pollution; and

Appendix III:
HRA Screening of Policy Options and Site Allocations October 2016 (& Updated November 2017)

Preferred Option Policy/ Allocation	Potential impacts of the Policy/ Allocation	Potential for LSE?
Proposed Policies		
Proposed Policy EM1- Safeguarding key existing employment land and buildings	The policy seeks to safeguard existing employment land for employment purposes, and a change in land use will not be permitted unless specific circumstances are met. The policy does not propose development itself and is unlikely to lead to any significant effects.	No
Proposed Policy EM2- Safeguarding Non-designated existing employment land and buildings	The policy seeks to protect non-designated employment sites from a change of land use that could have detrimental effects on the continuing operation of existing businesses. The policy does not propose development itself and is unlikely to lead to any significant effects.	No
Proposed Policy EM3- New employment allocations	The policy designates 3 sites in the Draft Local Plan for employment development. Screening of these sites for potential effects can be found below. As this policy is proposing development, there is a chance for significant effects.	Individual allocations screened below
Proposed Policy EM4- Promoting the cyber-security sector	The policy states that development proposals for cyber security businesses will be favoured, subject to being in accord with other relevant policies. The policy does not propose development itself and is unlikely to lead to any significant effects.	No
Proposed Policy EM5- Protecting the route of the former Honeybourne Rail Line	The policy aims to ensure development proposals do not damage the Honeybourne Rail Lines use as a continuous sustainable transport corridor. The policy does not propose development itself and is unlikely to lead to any significant effects, however any future development would be subject to project level HRA.	No
Policy PR1- Land allocated for housing development	The policy designates a number of sites for residential development. Screening details for the sites can be found below. As this policy is proposing development, there is a chance for significant effects.	Individual allocations screened below
Policy PR2- Land allocated for mixed use development	The policy designates a number of sites for mixed use development. Screening details for the sites can be found below. As this policy is proposing development, there is a chance for significant effects.	Individual allocations screened below
Proposed Policy GE8- Local Green Space	The policy will protect local green space and prohibit development on green space unless special circumstances are exhibited. The policy does not propose development itself and is unlikely to lead to any significant effects.	No

Policy EM3 Site Allocations		
Site Ref-? Site Name- Land south of Hatherley Lane, The Reddings	The site is around 11km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref-? Site Name- Land south of Jessop Avenue, Town Centre	The site is around 13km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. The River Chelt flows along the southern boundary of the site and therefore development could have an impact on water quality, however this will not have an impact on any European designations. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref-? Site Name- Land north-west of Grovefield Way, The Reddings	The site is around 10.8km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Policy PR1 Sites		
Site Ref- CP063 Site Name- Land at Reeves Field	The site is just over 11km from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. The River Chelt flows to the north-east of the site, however there is a sufficient boundary between the site and the River to ensure the water body is not negatively affected by development. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area.	No

	The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	
Site Ref-CP086 Site Name- Land at former Monkscroft Primary School	The site is just over 12km from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref-CP052 Site Name- Land at Springbook Shopping Centre	The site is around 15km from Dixton Wood SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- CP057 Site Name- Land at Christ College Site B	The site is 13.6km from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- CP078 Site Name- Land at Rivershill House	The site is around 12.5km from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- S113 Site Name- Land at Premier Products	The site is around 13km from the Dixton Wood SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No

Site Ref- CP061 Site Name- Land at Lansdown Road	The site is located just over 11km from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. Hatherley Brook flows to the south of the site, however there is a sufficient boundary between the site and the River to ensure the water body is not negatively affected by development. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- CP031 Site Name- Land at Leckhampton	The site is located 8.5km from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- CP034 Site Name- Land at Arle Nurseries/Old Gloucester Road	The site is 14.5km away from Dixton Woods SAC and is therefore unlikely to have a significant direct impact alone. The River Chelt runs along the northern border of the site, and development could impact the water quality of the river, however this will not have an impact on any European designations. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Policy PR2 Sites		
Site Ref-CP023 Site Name- Land at Priors Farm Fields	The site is 13.1km away from Dixton Woods SAC and is therefore unlikely to have a significant direct impact alone. Wymans Brook runs along the southern border of the site and development could have an impact on the water quality of the brook, however this will not have an impact on any European designations. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area.	No

	The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	
Site Ref- CP054 Site Name- Land at Coronation Square	The site is around 12.7km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- CP075 Site Name- Land at Royal Well and Municipal Offices	The site is around 12.7km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- CP067 Site Name- Land at 196-102 Prestbury Road	The site is around 13km away from Dixton Woods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Site Ref- CP101 Site Name- North Place and Portland Place	The site is 13.6km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No

Additional Policies and Site Allocations Considered November 2017		
Stone Crescent	The site is over 10km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Brockhampton Lane	The site is 10km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential environmental pathways for indirect negative impacts, and development is unlikely to have a significant impact on any of the European designated sites in the area. The potential in-combination effects are considered in Section 4 of the HRA Screening Report.	No
Policy/Site Allocation	**Potential impacts of the Policy/Allocation**	**Potential for LSE?**
Policies		
Development Management Policies	The policies do not propose development themselves and are unlikely to lead to any significant effects.	No