



CHELTENHAM LOCAL PLAN: Pre-Submission

HABITATS REGULATIONS ASSESSMENT (HRA) REVISED SCREENING REPORT & APPROPRIATE ASSESSMENT (AA)

July 2018

Cheltenham Borough Council Cheltenham Local Plan: Pre-Submission

Habitats Regulations Assessment (HRA) Revised Screening & Appropriate Assessment (AA) Report

July 2018

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prepared for:	Cheltenham Borough Council	
prepared by:	Owen Jeffreys Cheryl Beattie Barbara Carroll	Enfusion
quality assurance:	Barbara Carroll	Enfusion

Treenwood House
Rowden Lane

enfusion
environmental planning and management for sustainability



Bradford-on-Avon
BA15 2AU
T: 01225 867112
www.enfusion.co.uk

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1.0 Introduction

The Cheltenham Plan

- 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 Cheltenham². 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.
- 1.3 The Cheltenham Local Plan has now combined Part One and Two in order to prepare the Draft Local Plan Pre-Submission 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 policies³. The Pre-Submission Cheltenham Plan was published for Regulation 19 consultation during 12 February and 9 April 2018. The Council will now submit the Draft Cheltenham Plan independent examination, together with supporting evidence and comments made during the consultation.
- 1.4 The Local Plan has been developed since early proposals in 2015, through continuing technical studies, and with wide consultation to consider comments made. The preparation of the Local Plan has been informed by Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). Cheltenham Borough Council commissioned independent specialist consultants Enfusion Ltd to undertake the statutory SA process and the HRA process for the Cheltenham Local Plan.

¹ <https://jointcorestrategy.org/examination#main-modifications-evidence-base-and-examination-documents>

² <http://consult.cheltenham.gov.uk/consult.ti/CheltPlan/> (accessed 7 July 2018)

³ Ibid

Habitats Regulations Assessment (HRA)

- 1.5 The Council is required to undertake a Habitats Regulations Assessment⁴ (HRA) of the Local Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA screening considers if the potential impacts arising as a result of the Cheltenham Plan are likely to have significant effect on these sites either alone or in combination with other plans and projects. If a risk of Likely Significant Effects (LSEs) is identified, then the process should progress to the Appropriate Assessment (AA) stage.
- 1.5 The early Issues & Options stage of plan preparation was subject to initial HRA Screening (October 2016). The HRA process with detailed methods and findings was reported within the HRA Report (December 2017) that accompanied the Pre-Submission Local Plan on Regulation 19 consultation.
- 1.6 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 Cheltenham Plan; this work has been undertaken concurrently, with the findings from the two processes informing each other as appropriate.
- 1.7 The HRA had been prepared in accordance with extant guidance and practice documents at the time, as described in detail in Section 2 of the HRA Report. It concluded that the Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European sites, hence further Appropriate Assessment is not required.

CJEU Judgment on HRA Screening

- 1.8 On 12 April 2018, the Court of Justice of the European Union (CJEU) issued a judgment⁵, which ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment (AA) and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the screening stage.
- 1.9 The implication of this judgment is that competent authorities cannot take account of any integrated or additional avoidance or reduction measures when considering at the Habitats Regulations Assessment (HRA) screening stage whether a plan is likely to have an adverse effect on a European Site.
- 1.10 The HRA Report (November 2017) had been prepared before this CJEU was issued in April 2018. It had concluded through the screening process that

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 People over Wind & Sweetman v Coillte Teoranta Case C-323/17

some European sites were at risk from increased air pollution and disturbance as a result of policies and allocations in the Local Plan, but that the Plan's policies provide sufficient mitigation such that no significant effects are likely to occur, with alone or in-combination.

- 1.11 Since it is now not possible to take account of any integrated avoidance or other mitigation measures provided through plan policies at the HRA screening stage, it is necessary to revise the HRA process in order to be able to demonstrate procedural compliance.

Context: GCT JCS & The Cheltenham Plan

- 1.12 Cheltenham Borough Council, in partnership with Gloucester City Council and Tewkesbury Borough Council, have produced a Joint Core Strategy⁶ (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 guidance⁷.
- 1.13 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 Inspector⁸ 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 it 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. The GCT JCS was adopted⁹ in December 2017.
- 1.14 The GCT JCS was subject to HRA (Submission May 2014, Modifications Update October 2016)¹⁰; 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

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/>

¹⁰ https://jointcorestrategy.org/examination

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.

- 1.15 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, November 2016).
- 1.16 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. The updated HRA screening (November 2017)¹¹ considered the likely effects of these changes and the effects of the draft Plan as then presented for Regulation 19 consultation.

HRA Revised Screening & Appropriate Assessment

- 1.17 Therefore, the HRA screening has been revised to address the implications of the recent CJEU. The detailed European Site characterisations; Plans, Programmes & Projects Review; and Screening of Policies/Allocations (Appendices I, II & III) remain relevant and valid to the revised HRA. However, as the previous HRA had been undertaken during early stages of the preparation of the Pre-Submission Plan, including prior to final policy numbering, the opportunity has been taken to revise and update this work. These technical appendices are included here within this revised HRA Report.
- 1.18 The detailed screening of potential impacts against relevant European Site sensitivities or vulnerabilities has been revised and is presented in the new Appendix IV of the HRA Report. This appendix now excludes any consideration of integrated avoidance or other mitigation measures and thus concludes that there are some Likely Significant Effects (LSEs) identified and further Appropriate Assessment is required.

Consultation

- 1.19 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

¹¹ <http://consult.cheltenham.gov.uk/consult.ti/CheltPlan/>

alongside the Cheltenham Plan Part One for 6 weeks from 6 February to 20 March 2017.

- 1.20 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.
- 1.21 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.
- 1.22 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 had 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.
- 1.23 The further HRA Screening Report (November 2017) assessed the draft Cheltenham Plan and built upon the initial HRA screening work. The HRA Report accompanied the Regulation 19 Plan on consultation 12 February to 9 April 2018. Two comments were received with regard to the HRA Report. NE did not agree with the conclusion of no likely significant effects with regard to the Cotswold Beechwoods SAC and recreational pressures. The other respondent did not agree with the conclusion and was concerned with in-combination effects of traffic emissions and the Cotswold Beechwoods SAC.
- 1.24 The Council has decided to submit the draft Cheltenham Plan to the Secretary of State for independent examination. The revised HRA Report will

be submitted to Natural England for formal consultation during July-August 2018 in order for comments to be available to inform the examination in due course.

Purpose & Structure of this Report

- 1.25 This report documents the process and the findings of the HRA revised Screening and Appropriate Assessment (AA) for the Pre-Submission Cheltenham Plan. Following this introductory section, the document is organised into a further four 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-IV.
 - Section 4 describes the Appropriate Assessment, including avoidance and mitigation measures where necessary
 - Section 5 summarises the findings of the HRA and explains the next steps.
- 1.26 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; Appendix III systematically demonstrates the HRA screening of likely significant effects (LSEs) against the Regulation 19 Pre-Submission Plan Policies and Site Allocations; and Appendix IV screens the European Sites for Likely Significant Effects (LSEs) taking into account environmental pathways and risk.

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 guidance¹² 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 Government¹³ based on the European Commission's (2001) guidance for the Appropriate Assessment (AA) of Plans. The Government's 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

¹² DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas - core guidance for developers, regulators & land/marine managers

¹³ 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 guidance¹⁴ 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 Guidance¹⁵ 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 guidance¹⁶ 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 11¹⁷ 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.
- 2.9 In a recent court case¹⁸, Wealden District Council argued that whereas its Core Strategy (WCS) had been prepared on the basis that it would generate

¹⁴ Tyldesley, D., 2009, The Habitats Regulations Assessment of Local Development Documents (Natural England)

¹⁵ DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas- Core guidance for developers, regulators & land/marine managers

¹⁶ http://www.midsussex.gov.uk/media/78886/189_wealdenappendixb.pdf

¹⁷ <http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/index.htm>

¹⁸ <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

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.

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 (Pre-Submission)

Aims & Objectives

- 2.15 The Cheltenham Plan's Vision is divided into three separate themes. Under each theme are local Objectives to help achieve the desired Vision. The vision and corresponding Objectives will help shape what the Cheltenham Plan will deliver over the plan period, as follows:

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.	<ul style="list-style-type: none"> 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

	<p>that meets the needs of the current and future population</p> <ul style="list-style-type: none"> ■ 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	<ul style="list-style-type: none"> ■ 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	<ul style="list-style-type: none"> ■ Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas ■ Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure

environment are valued and recognised locally, nationally and internationally	<p>(including public art) to ensure that the borough maintains its reputation as a cultural destination and continues to be an attractive place to visit</p> <ul style="list-style-type: none"> ■ 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
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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 December 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 SD9
- 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 INF3; 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 & HD1-8
- Mixed-Use Development; Local Policies H2 & MD1-5

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.
- 3.3 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 Report¹⁹ (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and the environmental regulator, Natural England. No further concerns on the HRA were raised during the examination of the JCS and the HRA was found sound with adoption of the JCS. 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.

Identification of European Sites

- 3.4 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 – revised and updated. The European sites that have been included are listed below:
- Bredon Hill SAC
 - Cotswolds Beechwoods SAC
 - Dixon Woods SAC

¹⁹ <http://www.gct-jcs.org/Documents/Examination-Document-Library/SAPR119A-HRA-Addendum-Cotswold-Beechwoods.pdf>

- 3.5 Appendix I of this HRA Report details the characterisations of the European Sites scoped into the HRA and including conservation objectives with any specific vulnerabilities. A general overview of each of the three European Sites is provided in Table 3.1, as follows:

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 <i>Limoniscus violaceus</i> 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.
Cotswold Beechwoods SAC
The Cotswold Beechwoods SAC is the most westerly block of <i>Asperulo-Fagetum</i> 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 <i>Asperulo-Fagetum</i> Beech forests and semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>). 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 <i>Limoniscus violaceus</i> , 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, Programmes & Projects

- 3.5 A review of other plans, programmes & projects in and around the Cheltenham plan area was undertaken 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 – revised and updated. 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 Pre-Submission Cheltenham Plan

- 3.6 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 3.2: Housing, Employment and Infrastructure Development - Possible Effects & Impacts on European Sites

Effects on European Sites	Impact Types
Habitat & species - fragmentation and loss	<ul style="list-style-type: none"> Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations) Introduction of invasive species (predation)
Disturbance	<ul style="list-style-type: none"> Increased recreational activity (population increase) Noise and light pollution (from development and increased traffic)
Changes to hydrological regime/ water levels	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Increased traffic movements Increased emissions from buildings

- 3.7 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 revised screening (detailed in Appendix III) identified 17 Draft CLP Policies/Allocations that could potentially lead to likely significant effects. A summary of the policies and their potential impacts are provided in Table 3.3, as follows:

Table 3.3: Pre-Submission CLP Policies identified as having impacts that could lead to LSEs

Policy/ Allocation	Potential Impacts of the Policy/Allocation
Policy EM3 (a-d) New employment allocations	<p>The Policy makes provision over the Plan period for four small new employment sites. The Policy has the potential to result in:</p> <ul style="list-style-type: none"> atmospheric pollution through increased traffic, which could reduce air quality; increased levels of disturbance - recreational activity, noise and light pollution; increased levels of abstraction; surface water run-off and sewage discharge, which could reduce water quality and change water levels; and land take, which could lead to the loss and fragmentation of habitats and loss of species.

Policy/ Allocation	Potential Impacts of the Policy/Allocation
	<p>However, three are small sites in the central urban area and on existing/previously developed sites; and all are some 10-12 km distant such that adverse effects are unlikely alone or in-combination.</p>
<p>Policies H1(HD1-8) Housing</p>	<p>The Policies makes provision over the Plan period for 11,917 new homes - with 8 housing allocations & 5 mixed-use allocations. The Policies have the potential to result in:</p> <ul style="list-style-type: none"> ▪ atmospheric pollution through increased traffic, which could reduce air quality; ▪ increased levels of disturbance - recreational activity, noise and light pollution; ▪ increased levels of abstraction; surface water run-off and sewage discharge, which could reduce water quality and change water levels; and ▪ land take, which could lead to the loss and fragmentation of habitats and loss of species. <p>Site Allocations HD7 & 8 are some 13-14 km away from Dixon Woods SAC to the north and no pathways for negative effects alone, nor in-combination effects. Site HD8 is also some 20km away from the Cotswold Beechwoods SAC to the northwest, so adverse effects alone or in-combination very unlikely.</p> <p>Site Allocations HD1, HD2, HD3, HD4, HD5 and HD6 are all some 8-14km away from the nearest SAC- Cotswold Beechwoods and therefore adverse effects are unlikely alone; however, potential for in-combination effects with regard to changes in air quality and recreational disturbance.</p>
<p>Policies H2 (MD1-5) Mixed Use</p>	<p>The Policies makes provision over the Plan period for 11,917 new homes - with 8 housing allocations & 5 mixed-use allocations. The Policies have the potential to result in:</p> <ul style="list-style-type: none"> ▪ atmospheric pollution through increased traffic, which could reduce air quality; ▪ increased levels of disturbance - recreational activity, noise and light pollution; ▪ increased levels of abstraction; surface water run-off and sewage discharge, which could reduce water quality and change water levels; and ▪ land take, which could lead to the loss and fragmentation of habitats and loss of species. <p>Site Allocations MD1-4 are located within the existing urban area of the Town on previously developed land, over 12 km away, and therefore adverse effects are unlikely alone.</p> <p>Site Allocation MD5 is a larger allocation and adjacent to the existing urban area, some 8km distance. Adverse effects alone unlikely, but potential for in-combination</p>

Policy/ Allocation	Potential Impacts of the Policy/Allocation
	effects with regard to changes in air quality and recreational disturbance.

- 3.8 The Pre-Submission Cheltenham Plan Policies and their potential impacts were then screened against each of the European sites scoped into the HRA. This included consideration of the environmental pathways and sensitivities of the sites. Appendix IV details the results of the HRA screening process for the Pre-Submission Draft CBLP and revised in line with the CJEU on HRA (April 2018). The key findings are summarised, as follows:

Screening Assessment

- 3.9 HRA screening good practice (Appendix IV) combines both a Plan and a European Site focus. The policy screening removes from consideration those elements of the plan unlikely to have effects on European sites. The remaining plan elements (summarised above) can then be considered in more detail for their impacts on European Sites. The site focus considers the impacts and potential effects identified through the policy screening, in the light of the environmental conditions necessary to maintain site integrity for the European sites scoped into the assessment, as shown in the Tables 3.4 & 3.5, as follows:

Table 3.4: Screening Summary Key

Likely Significant Effect	Yes	Appropriate Assessment required
No Likely Significant Effect	No	No further assessment required
Significant Effect Uncertain	?	Uncertain, precautionary approach taken and Appropriate Assessment required

Table 3.5: HRA Screening Summary

European Sites	Potential Likely Significant Effects (LSEs)							
	Air Quality		Disturbance		Water Levels & Quality		Habitat Loss & Fragmentation	
	A ²⁰	IC ²¹	A	IC	A	IC	A	IC
European sites within or partly within the Cheltenham Plan area								
Cotswold Beechwoods SAC	No	Yes	No	Yes	No	No	No	No
Dixton Woods SAC	No	No	No	No	No	No	No	No
European sites outside the Cheltenham Plan area								
Bredon Hill SAC	No	No	No	No	No	No	No	No

- 3.10 There are 17 development sites proposed in the draft Cheltenham Plan – and thus with the potential for likely significant effects. The Dixton Woods SAC and the Bredon Hill SAC are not sensitive/vulnerable to reduced air quality; thus, no environmental pathways and no likely adverse significant effects. The Cotswold Beechwoods SAC is sensitive to changes in air quality and critical loads for nitrogen emissions (from vehicles) are being exceeded. Therefore, this section considers screening with regard to the CLP sites and the Cotswold Beechwoods site.
- 3.11 Policy EM3 makes provision for new local employment sites. Three are relatively small sites (<1 hectare) in the central urban area and on existing/previously developed sites some 10-12 km distant, and therefore, adverse effects are unlikely alone or in-combination. The new employment site (Policy EM3c) proposed at The Reddings is larger (approx. 6.4ha) and on greenfield but located on the western periphery of the town. It is considered that due to the nature of the proposed development (employment) and the distance (approx. 11 km) from the Cotswold Beechwoods SAC, adverse effects are unlikely alone or in-combination.
- 3.12 Seven of the housing allocations and four of the mixed-use allocations are more than 10 km distance from the Cotswold Beechwoods SAC. Policy HD4 Land off Oakhurst Lane is some 8km to the north-east; whilst Policy MD5 Land at Leckhampton is approx. 8.5km to the north of the protected European site. Policy HD4 is a local site with only approx. 25 new homes proposed such that adverse effects are unlikely alone or in-combination.
- 3.13 Land at Leckhampton (Policy MD5) had previously been investigated as a potential urban extension through the JCS. The HRA of the emerging JCS

²⁰ AA required alone?

²¹ AA required in combination?

found that given the proximity of the SAC to Gloucester, development at this site is unlikely to significantly increase the levels of atmospheric pollution at the SAC alone. The proposed development now for the Local Plan is much reduced to approx. 250 new dwellings and a secondary school. Whilst the local site is some 8.5km from the SAC, there is a need to consider the potential impacts on of development on the A46 that runs to the east of the site and adjacent to the SAC. There is the potential for increased levels of atmospheric pollution as the A46 is within 200m of the SAC.

- 3.14 Local transport assessments (December 2017)²² and the Stage 2 Transport Assessment (February 2018) acknowledge capacity issues at peak times for the Shurdington Lane/Leckhampton Lane and the A46. The highways assessment concluded that mitigation is not required as a result of the proposed developments as the majority of junctions are already over capacity and are not significantly worsened by the development traffic. Therefore, it is considered that the Leckhampton site is unlikely to have adverse significant effects alone. Further work will continue, as needed, to investigate the future level of traffic growth in Cheltenham.
- 3.15 Appendix II of this revised HRA report lists the other plans that could have in-combination effects with the Cheltenham Local Plan. This is further identified in Appendix IV that specifically the emerging Stroud Local Plan Review could have in-combination effects. Therefore, this was taken forward to further investigation through the Appropriate Assessment stage.

Disturbance:

- 3.16 The Dixon Woods and the Bredon Hill SACs are potentially sensitive to increased recreational activity through disturbance/removal of the decaying wood habitat that supports the Violet Click beetle, the main qualifying feature of the sites (Appendix I). However, recreation is not an issue at the sites, they are over 10 km away from the nearest CLP sites, and it is considered that adverse effects are unlikely alone or in-combination.
- 3.17 The Cotswold Beechwoods SAC is sensitive to increased disturbance – recreational activity, and noise and light pollution. Most of the proposed CLP development sites are over 10 km away and it seems unlikely that these small local sites would result in adverse effects alone – or in-combination.
- 3.18 With regard to the two proposed allocations that are nearer the Cotswold Beechwoods SAC, Policy HD4 Land at Oakhurst is small with only approx. 25 dwellings and is unlikely to increase recreational use either alone or in-combination. The Leckhampton site (Policy MD5) with approx. 250 new dwellings is some 8.5 km from the SAC. Given the proximity of the SAC to Gloucester, development is unlikely to significantly increase the levels of recreational access at the SAC alone. However, it is considered that there is the potential for in-combination effects, particularly with the emerging Stroud

²² <http://consult.cheltenham.gov.uk/consult.ti/CheltPlan/>

Local Plan Review. Therefore, this was taken forward to further investigation through the Appropriate Assessment stage.

Water Quality & Water Levels:

- 3.19 None of the three identified SACs are sensitive to the impacts of increased surface water run-off, discharges, or abstraction. Therefore, this was screened out of the HRA and there is no need for any further appropriate assessment – wither alone or in-combination.

Habitat Loss & Fragmentation:

- 3.20 The three identified SACs are sensitive/vulnerable to loss or fragmentation of habitat. However, the proposed development in the CLP will not result in any loss or fragmentation of these habitats and therefore, this was screened out of the HRA and there is no need for any further appropriate assessment – either alone or in-combination.

Further Assessment Needed?

- 3.21 The screening assessment identified uncertainty with regard to the potential for likely significant effects (LSEs) on one European site, the Cotswold Beechwoods SAC, as a result of changes to air quality and increased disturbance, including light and noise pollution. Significant effects are not considered to be likely alone but are considered potentially in-combination with other plans – specifically the emerging Stroud Local Plan Review. Based on the precautionary approach these issues will be considered in more detail through appropriate assessment (AA).

4.0 Appropriate Assessment (AA)

Introduction

- 4.1 This section addresses Stage 2 (Appropriate Assessment) of the HRA process, which considers if the likely significant effects on European Sites identified through the first Screening Stage (Section 3 of this report) have the potential to adversely affect European site integrity. This includes consideration of the environmental pathways and sensitivities of the sites, as well as mitigation provided by other Plan Policies, including Development Management Policies – in the JCS and the draft Cheltenham Plan. Appendix IV details the results of the HRA screening process for the Pre-Submission Draft CBLP and revised in line with the CJEU on HRA (April 2018) and as summarised previously in Table 3.5.
- 4.2 The screening of the Draft Cheltenham Plan (Appendix III & IV) and the review of plans and programmes 'in-combination' work (Appendix II) undertaken at the screening stage identified two main areas of impact arising that may have significant effects in-combination with other plans or projects on the identified European sites: air quality; and disturbance, including noise and light pollution. Each of these issues is investigated further below:

Air Quality

- 4.3 The screening assessment concluded that there is uncertainty with regard to the potential for likely significant effects in combination (specifically with the emerging Stroud Local Plan Review) at the Cotswold Beechwoods SAC through increased traffic along the A46 resulting in increased atmospheric pollution. The beechwoods and grasslands of the SAC are both sensitive to emissions, and critical loads for nitrogen (from vehicle exhausts) are being exceeded according to the most recent data available²³. The Site Improvement Plan (NE, March 2015) identifies air pollution and the impacts of atmospheric nitrogen as a priority issue. It may be noted that the delivery bodies to address this issue have yet to be determined.
- 4.4 The Cheltenham Plan needs to be considered in the context of the GCT JCS and its accompanying HRA Report. JCS Policy INF1 Transport Network requires that severe impacts, including cumulative, must be mitigated, and this will contribute to ensuring that any increases in atmospheric pollution, notably nitrogen emissions, will not be severe.
- 4.5 JCS Policy SD9 Biodiversity & Geodiversity requires that new development both within and surrounding internationally, nationally and locally designated sites should have no unacceptable adverse impacts – contributing strong mitigation measures to protect European sites. Integrated mitigation is also provided through the JCS with regard to relevant Strategic Allocations. Site

²³ Air Pollution Information System (2012) Site Relevant Critical Loads. Online at <http://www.apis.ac.uk/> [Accessed October 2016 & July 2018]

specific requirements for biodiversity, open/green space, and sustainable transport are included in the Strategic Allocation A3 North Brockworth - adjacent to the north-east of Gloucester and to the south of Cheltenham – likely to be the only major development in the JCS that might act in-combination with the CLP on the A46.

- 4.6 At the examination of the JCS, the issue of in-combination (cumulative) effects was discussed in the light of the Wealden Case (March 2017) that has required Natural England and Highways England to review their guidance in respect of impact assessment guidance and in-combination effects – as explained previously in this report in paragraphs 2.12-2.17. An HRA Note²⁴ (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 and were found sound and legally compliant (October 2017). The HRA concluded that there would be no likely significant effects from the JCS on identified European sites alone, or in-combination.
- 4.7 All the allocated sites within the area are unlikely to substantially increase traffic on any road which goes within 200 metres of the European sites due to the location of proposed local site allocations within Cheltenham. Therefore, any risk of significant in-combination effects caused by atmospheric pollutants are considered to be unlikely.
- 4.8 Commitments were made by the JCS authorities for further transport and air quality studies. The JCS was found sound subject to an immediate partial Review, further indicating that studies would continue. The JCS authorities, and the Cheltenham Borough Council, will continue to liaise with relevant neighbouring authorities, including the Stroud District Council that is of particular relevance to changes in air pollution and the Cheltenham Plan. Therefore, it is considered that there is policy and strategic mitigation measures in place, such that significant effects from air pollution are unlikely alone from the Cheltenham Plan, nor in-combination with other plans, especially the emerging Stroud Local Plan Review.

Disturbance

- 4.9 The screening assessment concluded that there is uncertainty with regard to the potential for likely significant effects in combination (specifically with the emerging Stroud Local Plan Review) at the Cotswold Beechwoods SAC through increased recreational disturbance arising from proposed new development. The majority of the beechwoods site is open access land for people on foot (especially dog-walkers) with a network of footpaths, including the Cotswold Way National Trail; also, bridleways open to horse and bike riders. The Site Improvement Plan (March 2015) identifies that public access/disturbance is the second of the two prioritised issues for the

²⁴ <http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/Main-Modifications-Examination-Document-Library/MM27-HRA-Note-14072017.pdf>

Beechwoods. The delivery bodies have been determined as Gloucestershire County Council, the National Trust, Natural England, and Tewkesbury Borough Council.

- 4.10 At the examination of the JCS, the issue of recreational impacts on the Cotswold Beechwoods SAC was discussed and addressed in some detail. An addendum to the HRA (May 2015) was prepared, together with a note on HRA and cumulative effects (July 2017). Subsequently, a Statement of Cooperation between the JCS authorities and Natural England was prepared. All parties agreed that any significant effects of the JCS on the Cotswold Beechwoods 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 it was acknowledged that 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 has been adopted.
- 4.11 JCS Policy INF3 (previously INF4) confirms that the JCS authorities will work together with key stakeholders, such as Environment 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.
- 4.12 The HRA Screening (November 2017) of the Regulation 19 Pre-Submission Cheltenham Plan concluded that the Plan would not have significant effects on the identified European sites, alone, or in-combination. Through the formal consultation, the environmental regulator Natural England (NE) reiterated their previous comments made on the initial 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.
- 4.13 Natural England 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.
- 4.14 Strategic mitigation is provided through the GCT JCS policies, including SD9 Biodiversity and site-specific requirements that will ensure access and appropriate recreational facilities for the strategic allocations. The Cheltenham Plan includes Policies GI1-3 that relate to local green space;

Policies CI1-2 relate to community infrastructure capacity and provision of sports/open space in new development – providing mitigation measures.

- 4.15 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 the European site.

NE appreciate and note the adoption of both JCS Policy SD9 Biodiversity and JCS INF3 Green Infrastructure, but they feel that further mitigation should be established with regards to recreational pressure through a strategic GI strategy. As most threat to the site is reported (SIP, 2015) as being from dog-walkers, mountain biking & horse-riding, it seems not unreasonable to assume that much recreational use is from local people, although the National Trail Cotswold Way does pass through the site.

- 4.16 Policy MD5 Leckhampton is the one proposed development (approx. 250 new homes) that is around 8km distance from the Beechwoods SAC and could contribute to increased recreational pressures in-combination. Site specific requirements include provision of playing fields for the school within the designated local green space and provision of pedestrian/cycle links. The development will also need to comply with JCS SD9 and JCS INF3 which will provide mitigation to protect the Beechwoods site and promote green infrastructure.
- 4.17 Given the proximity of the SAC to Gloucester City and the Stroud area, development at the Leckhampton site is unlikely to significantly increase the levels of recreational access and at the SAC alone. It is considered that any recreational disturbance is only likely in-combination with other plans/projects – specifically with the Stroud Local Plan Review. [It may be noted that the Draft Gloucester Plan²⁵ (2016-2031) Regulation 18 consultation 16 January – 27 February 2017 is on hold prior to development of the Pre-Submission version of the Plan in due course.]
- 4.18 Therefore, it is considered through this Appropriate Assessment that the likely significant effects must be investigated strategically in order to address in-combination effects – and this is most appropriately done through the JCS, in discussions with the JCS authorities, Stroud District Council, and Natural England. This is beyond the sphere of influence of the Cheltenham Borough Council alone.
- 4.19 Since the consultation representation from Natural England (April 2018), Cheltenham Council has met recently (June 2018) with Stroud District Council and it is understood that recreational surveys of relevant European Sites, including the Cotswold Beechwoods SAC, are to be commissioned with support from the JCS authorities. This work will inform the Stroud Local Plan Review and the JCS Partial Review, thus confirming the commitment from the

²⁵

<http://consult.gloucester.gov.uk/consult/ti/draftgloscitplan/consultationHome>

JCS authorities to work in partnership and Natural England to progress appropriate and strategic mitigation.

- 4.20 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, this appropriate assessment concludes that the Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European site Cotswold Beechwoods SAC with regard to changes in air quality or disturbance.

5.0 HRA Summary, Conclusions & Next Steps

Summary

- 5.1 This report presents the methods used and the findings arising from the HRA of the Pre-Submission Cheltenham Local Plan. The HRA has been undertaken in accordance with extant guidance and good practice, and taking into account the implications from the recent CJEU Judgment on HRA Screening and consideration of mitigation measures. The HRA screening has been revised and an Appropriate Assessment undertaken where necessary in respect of potential likely significant effects on air quality and disturbance with regard to one protected site – the Cotswold Beechwoods SAC. This HRA has been informed by the previous HRA work on the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (GCT JCS).
- 5.2 The GCT 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 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.
- 5.3 Cheltenham Local Plan Policies, including those with employment, 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/or that the local development sites are at least 8km distance from the three identified European sites – Cotswold Beechwoods SA, Dixton Woods SAC, and Bredon Hills SAC. However, the screening identified that there was some risk to the Cotswold Beechwoods SAC from changes to air quality and recreational disturbance in-combination with other plans, specifically the Stroud Local Plan Review.
- 5.4 Strategic mitigation measures are provided through the JCS Policies SD9 Biodiversity & Geodiversity and INF3 Green Infrastructure - there will be no adverse impacts on European sites, and the JCS authorities will work in partnership to develop management and mitigation packages for strategic green infrastructure. The concerns of the environmental regulator Natural England have been taken into account in progressing the Pre-Submission version of the Cheltenham Plan and the updated HRA Screening with Appropriate Assessment.
- 5.5 The Appropriate Assessment has considered the mitigation provided by the JCS Policies SD9 and INF3, and the draft Cheltenham Plan. This, together with recent commitments for further recreational studies with Stroud District Council, confirms the ongoing commitment from the JCS authorities with regard to strategic mitigation.

- 5.6 Cheltenham Borough Council will continue to consider the implications of the Local Sites in the Cheltenham Plan and the need for any further studies to inform the development of any local green infrastructure plan - and in line with ongoing JCS and Stroud District Council discussions.

Conclusion

- 5.7 The mitigation provided through the GCT JCS Policies SD9 and INF3, together with policies and allocations in the draft Cheltenham Plan, are sufficient such adverse impacts on air quality and recreational disturbance can be avoided – both alone and in-combination. It is considered that the potential in-combination effects on the Cotswold Beechwoods SAC from recreational pressures should be dealt with through strategic mitigation – as being discussed with the JCS authorities and Stroud District Council. Thus, the HRA concludes 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

- 5.8 The revised HRA screening and Appropriate Assessment findings will be subject to further consultation comments and advice from the relevant regulator, Natural England. 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.

Appendix I: European Site Characterisations

- **Bredon Hill SAC**
- **Cotswold Beechwoods SAC**
- **Dixton Wood SAC**

Please note that the JNCC and Natural England websites were checked for any updates to the information for the SACs and their Site Improvement Plans since the previous work reported in 2016; no updates were found.

Special Areas of Conservation (SACs)

Site Name: Bredon Hill Location Grid Ref: SO965406 JNCC¹ Site Code: UK0012587 Size: 359.86ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	<p>Bredon Hill is an area of pasture woodland and ancient parkland. The site provides habitat for the Violet Click Beetle <i>Limoniscus violaceus</i> 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.</p>
Qualifying Features	<p>Annex II Species primary reason for selection:</p> <ul style="list-style-type: none"> ■ Violet Click Beetle (<i>Limoniscus violaceus</i>)
Conservation Objectives	<p>With regard to the natural habitats and/or species for which the site has been designated (the Qualifying Features" listed below);</p> <p>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.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> ■ 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;

¹ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0012587> (accessed 6 July 2018)

Site Name: Bredon Hill Location Grid Ref: SO965406 JNCC¹ Site Code: UK0012587 Size: 359.86ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
	<ul style="list-style-type: none"> ■ The populations of qualifying species; ■ The distribution of qualifying species within the site. <p>Qualifying Features: S1079. <i>Limoniscus violaceus</i>; Violet click beetle</p>
Vulnerabilities (includes existing pressures and trends)	<p>Negative Impacts</p> <ul style="list-style-type: none"> ■ 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 <i>Limoniscus violaceus</i> 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 <p>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.</p>

Site Name: Cotswold Beechwoods Location Grid Ref: SO898134 JNCC² Site Code: UK0013658 Size: 585.85ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	<p>The Cotswold Beechwoods represent the most westerly extensive blocks of <i>Asperulo-Fagetum</i> beech forests in the UK. The woods are floristically richer than the Chilterns, and rare plants include red helleborine <i>Cephalanthera rubra</i>, stinking hellebore <i>Helleborus foetidus</i>, narrow-lipped helleborine <i>Epipactis leptochila</i> and wood barley <i>Hordelymus europaeus</i>. There is a rich mollusc fauna. The woods are structurally varied, including blocks of high forest and some areas of remnant beech coppice.</p>
Qualifying Features	<p>Annex I habitats primary reason for selection:</p> <ul style="list-style-type: none"> ■ <i>Asperulo-Fagetum</i> beech forests <p>Annex I habitats qualifying feature:</p> <ul style="list-style-type: none"> ■ Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>)
Conservation Objectives³ (October 2014)	<p>With regard to the natural habitats and/or species for which the site has been designated (the Qualifying Features³ listed below);</p> <p>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;</p> <ul style="list-style-type: none"> ■ The extent and distribution of qualifying natural habitats

² <http://publications.naturalengland.org.uk/publication/6276086220455936>

³ <http://publications.naturalengland.org.uk/publication/6200815333146624> (accessed 6 July 2018)

Site Name: Cotswold Beechwoods Location Grid Ref: SO898134 JNCC² Site Code: UK0013658 Size: 585.85ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
	<ul style="list-style-type: none"> ■ The structure and function (including typical species) of qualifying natural habitats, and ■ The supporting processes on which qualifying natural habitats rely <p>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</p>
Vulnerabilities (includes existing pressures and trends)	<p>Negative Impacts:</p> <ul style="list-style-type: none"> ■ 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 Improvement Plan⁴ (March 2015)	<p>The relevant prioritised issues that affect beech forests on neutral to rich soils include:</p> <ul style="list-style-type: none"> ■ Public Access/Disturbance - minimise impact of recreational use, especially mountain biking, horse-riding, and dog walking (delivery by GCC, NT, NE, TBC) ■ Air Pollution & impacts of atmospheric nitrogen – control, reduce and ameliorate atmospheric nitrogen impacts (delivery bodies yet to be determined)

⁴ <http://publications.naturalengland.org.uk/publication/6276086220455936> (accessed 6 July 2018)

Site Name: Dixon Wood Location Grid Ref: SO979313 JNCC⁵ Site Code: UK0030135 Size: 13.14 ha Designation: SAC	Habitats Regulations Assessment: Data Proforma
Site Description	<p>Dixon 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 <i>Limoniscus violaceus</i>, 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.</p>
Qualifying Features	<p>Annex II species primary reason for selection:</p> <ul style="list-style-type: none"> ■ Violet click beetle <i>Limoniscus violaceus</i>
Conservation Objectives	<p>With regard to the natural habitats and/or species for which the site has been designated (the Qualifying Features⁵ listed below);</p> <p>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.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> ■ 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.

⁵ <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0012587> (accessed 6 July 2018)

Site Name: Dixton Wood Location Grid Ref: SO979313 JNCC⁵ Site Code: UK0030135 Size: 13.14 ha Designation: SAC	Habitats Regulations Assessment: Data Proforma	
	Qualifying Features: S1079. <i>Limoniscus violaceus</i> ; Violet click beetle	
Vulnerabilities (includes existing pressures and trends)	Negative Impacts: <ul style="list-style-type: none"> ■ Changes in Biotic Conditions- High- Both ■ Forest & Plantation Management and use- Inside- Both ■ Interspecific floral relations- Inside- Both 	

Appendix II: Plans, Programmes & Projects Review

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
Gloucester, Cheltenham and Tewkesbury Joint Core Strategy GCT JCS (November 2014 & adopted December 2017)	<p>30,500 to 38,00 dwellings for period up to 2031</p> <p>The housing requirement for each local authority is as follows:</p> <ul style="list-style-type: none"> - Gloucester: 11,300 new homes - Cheltenham: 9,100 new homes - Tewksbury: 10,100 new homes <p>28,000 jobs with 64 hectares of employment land</p>	<p>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.</p> <p>The HRA Screening Report (October 2013)¹ that accompanied the submission of the JCS concluded that the JCS would not have adverse effects, either alone or in-combination, on the integrity of the identified European sites. Some concern was expressed by Natural England (NE) regarding potential effects from proposed strategic sites on the Cotswold Beechwoods Special Area of Conservation (SAC). An HRA Addendum Report was prepared (May 2015) that concluded that whilst there is a need for further detailed discussions between the Councils and Natural England regarding the management of the SAC and mitigation measures, the policy mechanisms are in place to deliver them.</p> <p>The proposed modifications to the JCS that were significant with regard to the HRA process are the two new strategic allocations A10 Winnycroft and A11 West Cheltenham. These were subject to HRA screening and details were provided in the SA Addendum Report (paragraphs 3.41-3.44, October 2016)² that accompanied the Proposed Main Modifications on consultation.</p> <p>The updated HRA concluded that the Proposed Modifications for the JCS will not have adverse effects, alone or in-combination, on the integrity of</p>

¹ <https://jointcorestrategy.org/> Evidence Base & HRA report within folder for Sustainability Appraisal - https://drive.google.com/file/d/0BwVPoSbUL_uXYVpCcmpwN29NMm8/view

² As above and https://drive.google.com/file/d/0BwVPoSbUL_uXRnNWUlp4X3d670E/view (accessed 6 July 2018)

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
		<p>the identified European sites. The JCS was found sound and adopted in December 2017.</p> <p>The GCT JCS sets the strategic framework for the three Local Plans, including the Draft Cheltenham Local Plan.</p>
<p>Tewkesbury Borough Local Plan³ Draft policies & site options consultation Feb 2015; Regulation 18 consultation anticipated autumn 2018</p>	<p>Plan period until 2031 8565 new dwellings New jobs and employment Land</p>	<p>The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan:</p> <ul style="list-style-type: none"> 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
<p>Cotswold District Local Plan⁴ Submitted June 2016, Focused Changes Dec 2016, Minor Modifications June 2017; Inspector's report June 2018; Main Modifications being prepared</p>	<p>Plan period until 2031 8,400 new dwellings 27 hectares of land for B-Class employment use resulting in around 1,500 to 11,900 new jobs</p>	<p>The HRA for the plan concluded, through the use of Appropriate Assessment, that any likely significant effects on European sites could be ruled out.</p> <p>The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan:</p> <ul style="list-style-type: none"> atmospheric pollution through increased traffic, which could reduce air quality increased levels of disturbance - recreational activity, noise and light pollution

³ <https://www.tewkesbury.gov.uk/emerging-planning-policies/>

⁴ <https://www.cotswold.gov.uk/residents/planning-building/planning-policy/emerging-local-plan/>

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
<p>Stroud Local Plan⁵ adopted Nov 2015;</p> <p>Local Plan Review commenced with Issues & Options consultation autumn 2017⁶; Preferred Options consultation anticipated autumn 2018 and Pre-Submission for autumn 2020</p>	<p>Plan period until 2031 3615 new dwellings 6,600-12,500 jobs with new employment land allocations and support for further town centre and retail floorspace</p> <p>Strategic sites:</p> <ol style="list-style-type: none"> 1. Hunts Grove Extension 750 2. North East Cam 450 3. Sharpness 300 4. Stroud Valleys 450 5. West of Stonehouse 1350 <p>Local Plan Review Period 2016-2036</p>	<p>▪</p> <p>The HRA included an appropriate assessment that identified three European sites for further investigation:</p> <ul style="list-style-type: none"> • 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 <p>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.</p> <p>The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan:</p> <ul style="list-style-type: none"> ▪ atmospheric pollution through increased traffic, which could reduce air quality ▪ increased levels of disturbance - recreational activity, noise and light pollution
<p>Gloucestershire Local Transport Plan LTP3 2011-2026⁷ & LTP4 2015-2031 with</p>	<p>Major road and transport schemes and interchanges</p>	<p>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.</p>

⁵ <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan>

⁶ <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review>

⁷ <https://www.gloucestershire.gov.uk/media/15065/cd1111-gloucestershire-local-transport-plan-2011-2026-ltp3.pdf>

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
consultation in March 2016 and now adopted		<p>The HRA Screening (April 2015)⁸ concluded that with several recommendations including incorporation of "no adverse effects on the integrity of European sites" into Policy 3.2, there is no requirement for AA.</p> <p>The Transport Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan:</p> <ul style="list-style-type: none"> atmospheric pollution through increased traffic, which could reduce air quality increased levels of disturbance - recreational activity, noise and light pollution
<p>Gloucestershire Minerals Local Plan⁹</p> <p>Regulation 19 Pre-Submission MLP currently at consultation 31 May to 13 July 2018.</p>	<p>Period 2018-2032</p> <p>7 strategic objectives make up the preferred option and are fall within themes. The emerging MLP identifies the following resource areas, which are of relevance:</p> <ul style="list-style-type: none"> 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. 	<p>The draft MLP identified 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.</p> <p>The draft MLP also identifies the provision potential of the Severn Vale Corridor resource area to provide potential new site allocations for sand and gravel working.</p> <p>The HRA (March 2018)¹⁰ for the emerging MLP acknowledged that there are uncertainties surrounding the minerals provision in Gloucestershire but concluded that AA is not required as all items that had been considered had now been screened out.</p>

⁸ https://www.gloucestershire.gov.uk/media/2976/hra_report_gloucs_ltp3_review_v10_010415-64866.pdf

⁹ <https://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/minerals-local-plan-for-gloucestershire/emerging-minerals-local-plan-for-gloucestershire-2018-2032/>

¹⁰ <https://www.gloucestershire.gov.uk/media/1520143/mlp-for-glos-2018-2032-publication-plan-hra-main-report.pdf>

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
		<p>The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan:</p> <ul style="list-style-type: none"> atmospheric pollution through increased traffic, which could reduce air quality increased levels of disturbance - noise and light pollution
<p>Gloucestershire Waste Local Plan¹¹ Core Strategy (2012-2027) Adopted (Nov 2012)</p>	<p>WLP period to 2027 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:</p> <ul style="list-style-type: none"> 1. Wingmoor Farm East 2. The Park 3. Wingmoor Farm West 4. Javelin Park 5. Land at Moreton Valence 	<p>The HRA accompanying the submission CS concluded that the Waste CS and associated policies will have no likely significant effects alone or in-combination on any European designated sites for nature conservation.</p> <p>The Waste Local Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan:</p> <ul style="list-style-type: none"> atmospheric pollution through increased traffic, which could reduce air quality; increased levels of disturbance - noise and light pollution; and
<p>Severn River Basin Management Plan 2009¹²</p>	<p>Proposals relating to the Severn area and its related pressures, including the Estuary area.</p>	<p>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.</p> <p>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.</p>

¹¹ <https://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/gloucestershire-waste-core-strategy/>

¹² <https://www.gov.uk/government/publications/river-basin-management-plan-severn-river-basin-district>

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
		The HRA 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) and WRMP 2019 ¹³	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 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 the WRMP and will not be taken forward.
Development associated with the decommissioning of Berkeley Power Station ¹⁴	The station is 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. However, this is subject to the relevant environmental assessment procedures and decommissioning environmental management planning and management. The Plan has the potential to result in in-combination effects with the Draft Cheltenham Borough Local Plan:

¹³ <https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/>

¹⁴ <https://magnoxsites.com/site/berkeley>

Plan/Project	Proposal	Potential impacts that could cause 'in-combination' effects
		<ul style="list-style-type: none"> ▪ atmospheric pollution through increased traffic, which could reduce air quality; ▪ increased levels of disturbance - noise and light pollution; and

Appendix III: HRA Screening of Proposed Policies and Site Allocations (October 2016, Updated November 2017) and revised July 2018

Please note that the opportunity was taken to update this appendix according to the numbering of the final policies and allocations as presented in the Pre-Submission Cheltenham Local Plan (previously only drafts had been available at the time of the HRA).

Policy or Allocation	Potential impacts of the Policy/Allocation	Potential for LSE?
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
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
Policy EM3 New employment allocations	The policy designates 4 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 the potential for significant effects.	Yes - Individual allocations screened below
Policy EM3 a Land South of Jessop Avenue, Town Centre	Approx. 0.34 ha and comprising a flat parcel of brownfield land; planning permission for office development granted in October 2016. The allocation is on previously developed land in the town centre and therefore, there is no new development proposed that could have likely significant effects. 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	Yes

	<p>development is unlikely to have a significant impact on any of the European designated sites in the area.</p> <p>There is the potential for in-combination effects with other developments.</p>	
<p>Policy EM3 b Land South of Hatherley Lane, The Reddings</p>	<p>Approx. 0.86 ha allowing opportunity for the expansion of contemporary business activities within a modern business park environment; previously used for employment land and therefore, unlikely to have significant effects.</p> <p>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.</p> <p>There is the potential for in-combination effects with other developments.</p>	Yes
<p>Policy EM3 c Land north-west of Grovefield Way, The Reddings</p>	<p>Approx. 6.4 ha on the western periphery, immediately west of the GCC Park & Ride; allocation on greenfield & providing opportunity for a modern business area, well connected, and at an important gateway location.</p> <p>It is around 11km from 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.</p> <p>There is the potential for in-combination effects with other developments.</p>	Yes
<p>Policy EM3 d Land at Chelt Walk, Town Centre</p>	<p>Approx. 0.68 ha at the western edge of the Town Centre, currently a carpark and thus brownfield land; allocation is opportunity for modern office development.</p> <p>It is over 10 km from 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.</p>	Yes

	There is the potential for in-combination effects with other developments.	
Policy EM4 Employment Skills Plans	New policy that requires and ESP to be submitted for major indoor commercial development of 1,000 sq.m or more. The policy does not propose development itself and is unlikely to lead to any significant effects.	No
Policy EM5 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
Policy EM6 Conversion of Rural Buildings	The policy supports appropriate forms of employment-related development in the countryside – as most rural buildings are within the Green Belt or AONB, their re-use and conversion requires special consideration. The policy relates to conversion and does not propose additional development itself and therefore, is unlikely to lead to any significant effects.	No
Policies D1-D3 Design Requirements	These policies relate to design requirements and do not propose development in themselves – therefore, unlikely to lead to any significant effects.	No
Policies GB1-GB2 Green Belt	Policy GB1 relates to residential infilling in the Green Belt; GB2 relates to rebuilding or replacement of dwellings in the Green Belt. As new development is not proposed in itself – therefore, unlikely to lead to any significant effects.	No
Policy L1 Landscape & Setting	The policy relates to the setting of Cheltenham; it does not propose development itself and is unlikely to lead to any significant effects.	No
Policies HE1-HE5 Historic Environment	These policies relate to the protection and enhancement of the historic environment and its setting; they do not propose development itself and are unlikely to lead to any significant effects.	No
Policy SL1 Safe & Sustainable Living	The policy relates to safety, security and good, sustainable design; it does not propose additional development itself and therefore, is unlikely to lead to any significant effects.	No
Policies HM1-HM5 Housing Mix & Standards	These policies relate to the detailed guidance in respect of student accommodation; elderly care provision; loss of residential accommodation; agricultural & forestry	No

	<p>dwellings; houses in multiple occupation. The JCS has identified housing need for specific types of dwellings but has delegated policies on meeting those needs to the district plans. The overall level of development growth will not be affected and this is considered through the screening for Policies H1 & H2.</p>	
<p>Policy GT1 Gypsy, Traveller & Travelling Showpeople Sites</p>	<p>New policy identifying one site at Castle Dream Stud, Mill Lane for 3 pitches to accommodate the future needs. The development is so small and located over approx.15 km from the nearest SACs that LSEs are very unlikely.</p>	No
<p>Policies GI1-GI3 Green Infrastructure</p>	<p>These policies relate to local green space; protection and replacement of trees; and trees and development; they do not propose development itself and are unlikely to lead to any significant effects.</p>	No
<p>Policies CI1-CI4 Social & Community Infrastructure</p>	<p>These policies relate to the adequacy of community infrastructure capacity; sports & open space provision; allotments; and broadband provision. Policy CI1 could lead to additional development and therefore the potential for significant effects. However, such community infrastructure will be within the existing urban area, contained and distant from the SACs such that LSEs are very unlikely.</p>	No
<p>Policy TN1 Protecting the route of the former Honeybourne rail line</p>	<p>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.</p>	No
<p>Policy TN2 Long Stay car parking</p>	<p>The policy relates to facilities in the Core Commercial Area; unlikely to lead to any significant effects.</p>	No
<p>Policy H1 Land allocated for housing development</p>	<p>The policy designates 8 sites for residential development. Screening details for each site can be found below. As this policy is proposing development, there is the potential for significant effects.</p>	Yes Individual allocations screened below
<p>Site Ref: CP086 Policy HD2: Land at former Monkscroft Primary School (approx. 60 dwellings)</p>	<p>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.</p>	Yes

	There is the potential for in-combination effects with other developments.	
Site Ref: CP057 Policy HD1: Land at Christ College Site B (approx. 70 dwellings)	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. There is the potential for in-combination effects with other developments.	Yes
Site Ref: CP034 Policy HD8: Old Gloucester Road (approx. 175 dwellings)	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. There is the potential for in-combination effects with other developments.	Yes
Site Ref: CP023 Policy HD7: Land at Priors Farm Fields (approx. 50-90 dwellings)	The site is approx.13 km away from Dixton Woods SAC and approx. 12 km from Cotswold Beechwoods SAC - 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. There is the potential for in-combination effects with other developments.	Yes
(Previously site f) Policy HD3: Bouncer's Lane (70 dwellings)	The site is around 12km 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. There is the potential for in-combination effects with other developments.	Yes
Policy HD4:	The site is around 8km away from the Cotswolds Beechwoods SAC and is therefore unlikely to have a significant direct impact alone. There are no potential	Yes

Land off Oakhurst Lane (approx. 25 dwellings)	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. There is the potential for in-combination effects with other developments.	
Site Ref: CP087 Policy HD5: Land at Stone Crescent (approx. 15 dwellings) (additional site considered in November 2017)	The site is around 12km 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. There is the potential for in-combination effects with other developments.	Yes
Policy HD6: Brockhampton Lane (20 dwellings) (additional site considered in November 2017)	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. There is the potential for in-combination effects with other developments.	Yes
Policy H2: Land Allocated for Mixed Use Development	The new policy designates 2 sites for residential development. Screening details for each site can be found below. As this policy is proposing development, there is the potential for significant effects.	Yes Individual allocations screened below
Policy MD1: Lansdown Industrial Estate (approx. 100 dwellings plus no net loss in employment on the site)	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. There is the potential for in-combination effects with other developments.	Yes
Site Ref: CP101 Policy MD2: North Place and Portland Place (approx. 143 dwellings plus appropriate town centre mixed use scheme and car park)	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. There is the potential for in-combination effects with other developments.	Yes

Policy MD3: Land at Coronation Square (regeneration of existing community & retail facilities)	This policy relates to regeneration of existing town centre facilities; it will not lead to additional development and therefore, is unlikely to have a significant impact on any of the European designated sites in the area.	No
Policy MD4: Royal Well and Municipal Offices	Mixed use redevelopment appropriate for town centre uses; it will not lead to additional development and therefore, is unlikely to have a significant impact on any of the European designated sites in the area.	No
Site Ref: CP031 Policy MD5: Land at Leckhampton (approx. 250 dwellings & a secondary school)	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. There is the potential for in-combination effects with other developments.	Yes

Appendix IV: European Sites Screening for Likely Significant Effects (LSEs)

European sites within or partly within the Plan area

- Cotswold Beechwoods SAC
- Dixton Wood SAC

European sites outside the Plan area

- Bredon Hill SAC

Screening Summary Key

Likely Significant Effect	Yes	Further Appropriate Assessment required
No Likely Significant Effect	No	No further Appropriate Assessment required as no pathways identified
Significant Effect Uncertain	?	Precautionary approach taken and further Appropriate Assessment required

European sites within or partly within the Plan area

Cotswold Beechwoods SAC						
Potential impacts of the Cheltenham Plan	Environmental Pathways	Is the site sensitive/ vulnerable to these impacts?	Risk?	LSE alone ?	Potential impacts of other plans and programmes	LSE in-comb?
<p>Reduced air quality through increased traffic and emissions from buildings.</p> <p>Draft CLP Policies: EM3; HM1-HM5; GT1; C11; H1 and HD1-8; H2 and MD1-5</p>	<p>Proposed development has the potential to increase traffic along the A46, which is within 200m of the site. Potential pathway for short range atmospheric pollution. Baseline information indicates that the most residents work within the JCS area, commuting within & between the three main settlements¹ of Gloucester City, Cheltenham Town and Tewkesbury Town. Therefore, much of the traffic that might increase on the A46 as a result of certain strategic Site Allocations is unlikely to travel near to the SAC site as the site is south (approx. between 2 and 5.5km away) of the three main settlements. Thus, the policies are unlikely to result in a significant increase in traffic on major roads within 200m of the site².</p> <p>Most CLP local site allocations are within the central area of the town and approx. 12km from the SAC; 2 allocations HD4 & MD5 are to the south-east and approx. 8km from the SAC.</p>	<p>Yes, the beech woods and grasslands are sensitive to atmospheric pollution.</p> <p>Critical loads for nitrogen are being exceeded for both the beech forest and grassland at the site³.</p> <p>Critical loads for acid deposition are not being exceeded at the site for either habitat⁴.</p>	Yes	No	There is the potential for the policies to act in combination with plans & programmes identified in Appendix II, specifically with the emerging Stroud Local Plan Review.	Yes

¹ ONS - Area Based Analysis, Commuting Patterns from the Annual Population Survey, Local Authorities, 2010 and 2011

² According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant. Department for Transport (2015) Local Air Quality TAG Unit 3.1.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638648/TAG_unit_a3_envir_imp_app_dec_15.pdf (accessed October 2016 & July 2018)

³ Air Pollution Information System (2012) Site Relevant Critical Loads. Online at <http://www.apis.ac.uk/> [Accessed October 2016 & July 2018]

⁴ Ibid

	There is also the potential for impacts as a result of increased diffuse (long range) atmospheric pollution.					
Increased disturbance - recreational activity and noise and light pollution. Draft CLP Policies: H1 and HD1-8; H2 and MD1-5	The majority of the site is open access land for people on foot. There is also a network of footpaths, as well as bridleways open to horse and bike riders. The Cotswold Way National Trail also passes through the site.	Yes, the site is sensitive to disturbance from recreational activities.	Yes	No	There is the potential for the policies to act in combination with plans & programmes identified in Appendix II, specifically the Stroud Local Plan Review.	Yes
Changes to Water Quality and Levels through increased surface water run-off, discharges and abstraction. Draft CLP Policies: H1 and HD1-8; H2 and MD1-5	There are no pathways for impacts on water quality given the elevation of the site ⁵ . The site is situated within the Seven Water Resource Zone, although increased levels of abstraction are unlikely to affect the integrity of the site.	Site is not considered sensitive to the impacts of increased surface water run-off, discharges and abstraction.	No	No	Site is not considered sensitive to the impacts increased surface water run-off, discharges and abstraction.	No
Habitat loss and fragmentation as a result of proposed development. Draft CLP Policies: GT1; H1 and HD1-8; H2 and MD1-5	The Plan makes provision over the Plan period for 10,917 new homes and 4 small allocations to support new jobs. The development will be focused in the existing urban area of Cheltenham. None of the proposed site allocation locations are likely to lead to direct or indirect loss or fragmentation of designated land or supporting habitat.	The designated feature is sensitive to the loss of supporting habitat.	Yes	No	N/A	No

⁵ Enfusion telephone conversation with Natural England with regard to the HRA of the emerging GCT JCS (August 2013)

Dixton Woods SAC						
Potential impacts of the Plan	Environmental Pathways	Is the site sensitive/ vulnerable to these impacts?	Risk?	LSE alone?	Potential impacts of other plans and programmes	LSE in-comb?
Reduced air quality through increased traffic and emissions from buildings. Draft CLP Policies: EM3; HM1-HM5; GT1; C11; H1 and HD1-8; H2 and MD1-5	There are no major roads within 200m of the site ⁶ ; therefore, there is no pathway for impacts as a result of short range atmospheric pollution. However, there is the potential for impacts as a result of increased diffuse (long range) atmospheric pollution.	According to APIS critical loads for nitrogen are being exceeded at the site. However, given that the Violet Click Beetle relies upon decaying timber it is not considered sensitive to the impacts of increased atmospheric pollution.	No	No	There is the potential for the CLP to act in-combination with a number of plans and programmes. However, given that the site is not considered sensitive to the impacts of atmospheric pollution, it is considered that there will not be significant effects.	No
Increased disturbance - recreational activity and noise and light pollution. Draft CLP Policies: EM3; HM1-HM5; GT1; C11; H1 and HD1-8; H2 and MD1-5	As stated previously, the level of development that the Plan makes provision for will be focused in the existing urban area and in urban extensions and strategic allocations set out in JCS Policies A1, A4-5, A8-11. The nearest JCS strategic allocation is A8 which is approximately 4 km away. The CLP sites are over 15 km away.	Increased recreational activity has the potential to result in physical disturbance (e.g. the removal of decaying wood) of the habitat that supports the Violet Click Beetle. However, discussion with an NE Officer confirmed that recreation is not an issue at the site ⁷ . Although it was noted that the site may be vulnerable to vandalism if development was located close by ⁸ .	Yes	No	Given the small levels of development proposed within 10km of the site in the neighbouring authority of South Worcester, the sites inaccessibility and steepness, the main focus of development in the JCS and the CLP being located in urban areas, and the distance (over 15-20	No

⁶ According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant. Department for Transport (2015) Local Air Quality TAG Unit 3.1.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638648/TAG_unit_a3_envir_imp_app_dec_15.pdf (accessed October 2016 & July 2018)

⁷ Enfusion telephone conversation with Natural England with regard to the HRA of the emerging GCT JCS (August 2013)

⁸ Consultation response – Natural England (October 2011) on HRA Screening Report for Gloucester, Cheltenham and Tewkesbury (December 2011)

	The site is steep and inaccessible and as a result the potential for LSE is small.				km) of Cheltenham from the4 site, it is considered unlikely that the policies will contribute to increased levels of recreational activity and therefore in combination effects.	
Changes to Water Quality and Levels through increased surface water run-off, discharges and abstraction. Draft CLP Policies: EM3; HM1-HM5; H1 and HD1-8; H2 and MD1-5	There are no pathways for impact given the elevation of the site and the Violet Click Beetles reliance on decaying timber.	The Violet Click Beetle relies upon decaying timber so it is therefore not considered to be vulnerable to reduced water quality and levels.	No	No	Site is not considered sensitive to the impacts increased surface water run-off, discharges and abstraction.	No
Habitat loss and fragmentation as a result of proposed development. Draft CLP Policies: EM3; HM1-HM5; H1 and HD1-8; H2 and MD1-5	The Plan makes provision over the Plan period for 10,917 new homes and 4 small allocations to support new jobs. The development will be focused in the existing urban area of Cheltenham. None of the proposed site allocation locations are likely to lead to direct or indirect loss or fragmentation of designated land or supporting habitat.	The designated feature is sensitive to the loss of supporting habitat.	Yes	No	N/A	No

European sites outside the Plan area

Bredon Hill SAC						
Potential impacts of the Plan	Environmental Pathways	Is the site sensitive/ vulnerable to these impacts?	Risk?	LSE alone?	Potential impacts of other plans and programmes	LSE in-comb?
Reduced air quality through increased traffic and emissions from buildings. Draft CLP Policies: EM3; HM1-HM5; H1 and HD1-8; H2 and MD1-5	There are no major roads within 200m of the site; therefore, there is no pathway for impacts as a result of short range atmospheric pollution ⁹ . However, there is the potential for impacts as a result of increased diffuse (long range) atmospheric pollution.	According to APIS critical loads for nitrogen are being exceeded at the site. However, given that the Violet Click Beetle relies upon decaying timber it is not considered sensitive to the impacts of increased atmospheric pollution.	No	No	There is the potential for the JCS & CLP to act in-combination with a number of plans and programmes; however, given that the site is not considered sensitive to the impacts of atmospheric pollution, it is considered that there will not be significant effects.	No
Increased disturbance - recreational activity and noise and light pollution. Draft JCS Policies: EM3; HM1-HM5; H1 and HD1-8; H2 and MD1-5	There are a number of public paths/tracks and bridleways that run through and around the site. However, the NE Officer responsible for Bredon Hill SAC has stated that recreational activity is not an issue at the site ¹⁰ . The site is approximately 2 km outside of the JCS area and over 15 km from the Cheltenham urban area such that it is very unlikely that proposed development will	Increased recreational activity has the potential to result in physical disturbance (e.g. the removal of decaying wood) of the habitat that supports the Violet Click Beetle. The site is not considered sensitive to noise and light pollution.	Yes	No	The JCS & CLP policies have the potential act in-combination with the South Worcestershire Development Plan as well as the Cotswold Local Plan. However, recreational activity is not an issue at the site ¹¹ , and therefore, there will not be significant effects.	No

⁹ According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant. Department for Transport (2015) Local Air Quality TAG Unit 3.1.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638648/TAG_unit_a3_envir_imp_app_dec_15.pdf (accessed October 2016 & July 2018)

¹⁰ Enfusion telephone conversation with Natural England with regard to the HRA of the emerging GCT JCS (July 2012)

¹¹ Ibid

	increase levels of noise and light pollution at the site.					
Changes to Water Quality and Levels through increased surface water run-off, discharges and abstraction. EM3; HM1-HM5; H1 and HD1-8; H2 and MD1-5	There are no pathways for impact given the elevation of the site and the Violet Click Beetles reliance on decaying timber.	The Violet Click Beetle relies upon decaying timber so if therefore not considered to be vulnerable to changes in water levels.	No	No	There is the potential for the JCS & CLP to act in-combination with a number of plans and programmes; however, the Violet Click Beetle relies upon decaying timber so if therefore not considered to be vulnerable to changes in water levels. As a result, it is unlikely that there will be significant effects.	No
Habitat loss and fragmentation as a result of proposed development.	No development is proposed that would result in the direct or indirect loss or fragmentation of designated land or supporting habitat.	The designated feature is sensitive to the loss of supporting habitat; however, there are no pathways for impacts.	No	No	N/A	No