

GLOUCESTER CITY PLAN

2011-2031

HABITATS REGULATIONS ASSESSMENT

REVISED SCREENING &

APPROPRIATE ASSESSMENT REPORT

July 2019

enfusion



Gloucester City Plan 2016-2031: Pre-Submission

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

July 2019

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prepared for:	Gloucester City Council	
prepared by:	Owen Jeffreys Cheryl Beattie Barbara Carroll	Enfusion
quality assurance:	Barbara Carroll	Enfusion



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1.0 INTRODUCTION

The Gloucester City Plan (GCP)

- 1.1 Gloucester City Council (GCC) is preparing the Gloucester City Plan¹ (GCP) to guide future development in the Local Authority area. The GCP will set out an overall strategy to guide local development across the City in the period up to 2031. The new Local Plan is part of a hierarchy of planning guidance, sitting underneath the higher-level Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS, adopted December 2017)² and the National Planning Policy Framework (revised 2018)³.
- 1.2 The Council initially undertook work on developing a new Local Plan during 2011-2013; this was then put on hold as the GCT JCS was being developed. Further work was continuing through 2016 to the publication of the Draft City Plan in early 2017 for Regulation 18 statutory consultation. Whilst further work was carried out on the JCS, the City Plan was put on hold again until the JCS was adopted in December 2017. During 2018 and into 2019, the development of the GCP has continued, including taking into account the final adopted JCS, the representations made on the draft plan in early 2017, and updating the plan especially with regard to the potential sites for allocation.

Habitats Regulations Assessment (HRA)

- 1.3 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 Gloucester City Plan are likely to have significant effects 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.
- 1.4 The HRA process has its own legislative drivers and requirements and, while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider Sustainability Appraisal (SA) process. The HRA process has been undertaken in parallel with the SA process but the detailed methods and findings are reported separately within this HRA Report. Summary HRA findings are incorporated into the Integrated Appraisal (IA) Report.
- 1.5 Enfusion Ltd, specialists in SA/SEA and HRA, were commissioned to progress the HRA of the Gloucester City Plan on behalf of the Council with their role as the competent authority. At the same time, Enfusion has been undertaking

¹ <https://www.gloucester.gov.uk/planning-development/planning-policy/city-plan/>

² <https://www.jointcorestrategy.org/>

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴ The Conservation of Habitats & Species Regulations 2010, as amended 2018
<http://www.legislation.gov.uk/uksi/2018/1307/contents/made>

the Sustainability Appraisal (incorporating Strategic Environmental Assessment and Equality Impact Assessment) of the emerging GCP; this work has been undertaken concurrently, with the findings from the two processes informing each other as appropriate.

The GCT JCS & the Gloucester City Plan

- 1.6 Gloucester City Council, in partnership with Cheltenham & Tewkesbury Borough Councils, have produced a Joint Core Strategy (JCS) that sets out the strategic planning framework for the delivery of development across the three local authority areas. The GCT JCS (plan period to 2031) sets out the housing and employment needs for the Gloucester City area, the strategic direction for development growth, and strategic policies to guide development. The GCP covers the administrative area of Gloucester City and, alongside the JCS, will provide the planning policies that will be used to guide and manage development over the plan period to 2031.
- 1.7 The GCT Joint Core Strategy (JCS Policy SP2) includes urban extensions within the Tewkesbury Borough area – to help meet the needs of Gloucester City; cross-boundary urban extensions at North West Cheltenham and West Cheltenham (both of which are partly within Tewkesbury Borough) – to help meet the needs of Cheltenham Borough; and strategic allocations adjacent to the northern edge of Gloucester City to help meet the needs of Gloucester - SA1 Innsworth & Twigworth, A2 South Churchdown, A3 North Brockworth, and also at the eastern edge of the urban area near the M5, A6 Winnycroft. The JCS (Policy SP2) makes provision for 14,359 new homes within the Gloucester City area – to meet the needs of Gloucester. This is proposed to be met through existing commitments and smaller scale development meeting local needs.
- 1.8 The GCT JCS was subject to HRA (Submission May 2014, Modifications Update October 2016)⁵; the SA and HRA were found through examination to have met their legal requirements. The HRA concluded that the proposed modifications to the JCS (as consulted upon) would not have any adverse effects, alone or in-combination, on the integrity of the identified European sites. This HRA of the Gloucester City Plan has to be considered within the strategic context and findings of the HRA of the JCS.

CJEU Judgment on HRA Screening

- 1.9 On 12 April 2018, the Court of Justice of the European Union (CJEU) issued a judgment⁶, 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

⁵ <https://jointcorestrategy.org/examination>

⁶ People over Wind & Sweetman v Coillte Teoranta Case C-323/17

stage. 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 HRA screening stage whether a plan is likely to have an adverse effect on a European Site.

- 1.10 The initial HRA Report (2016) for the GCP had been prepared before this CJEU was issued in April 2018. It had concluded through the screening process that 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.

HRA Revised Screening & Appropriate Assessment

- 1.12 Therefore, the HRA screening has been revised to address the implications of the recent CJEU. The detailed European Site characterisations (Appendix I) and Plans, Programmes & Projects Review (Appendix II) remain relevant and valid to the revised HRA. Appendix III HRA Screening of Policies & Site Allocations for potential impacts and Appendix IV European Sites Screening for Likely Significant Effects (LSEs) have been revised to exclude any consideration of integrated avoidance or other mitigation measures. It is thus concluded that there are some Likely Significant Effects (LSEs) identified and further Appropriate Assessment is required.

Consultation

- 1.13 The Habitats Regulations require the plan making/competent authority to consult the appropriate nature conservation statutory body. Due to the proximity to Wales and the potential of far reaching effects on European designations, both Natural England (NE) and Natural Resources Wales (NRW) were consulted on HRA Reports, as was the situation for the GCT JCS and its HRA.
- 1.14 The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. Natural England was consulted on the initial HRS screening report (October 2016) that accompanies the draft GCP on Regulation 18 consultation in early 2017. NE advised⁷ that mitigation measures for increased recreational pressures on the Cotswold Beechwoods & Severn Estuary European sites needs to be delivered through a strategic mitigation strategy – the framework for which is being developed with the JCS. After adoption of the JCS, further discussions were held with NE who then

⁷ Letter from NE to GCC (February 2017) responding to the GCP Regulation 18 consultation & HRA

provided further advice⁸ to inform the development of the GCP and the preparation of the revised HRA. In addition to the statutory consultation undertaken with the appropriate nature conservation body, this HRA Report is available for wider public consultation alongside the GCP.

Purpose & Structure of Report

- 1.15 This report documents the process and the findings of the HRA revised screening and appropriate assessment for the Gloucester City 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 GCP
 - 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
- 1.16 Details are provided in technical appendices: Appendix I summarises the relevant European Site Characterisations; Appendix II provides a review of relevant plans, programmes and projects; and Appendix III systematically demonstrates the HRA screening of likely significant effects (LSEs) against the Pre-Submission Plan Policies and proposed Site Allocations. Appendix IV screens the European sites for likely significant effects (LSEs) taking into account their particular sensitivities, any environmental pathways and risk.

⁸ Letter from NE to GCC (August 2018) detailing interim approach to HRA & evidence gathering in relation to recreation pressure on European sites – Cotswold Beechwoods & Severn Estuary

2.0 HABITATS REGULATIONS ASSESSMENT & THE LOCAL PLAN

Requirements for Habitats Regulations Assessment

- 2.1 The Conservation of Habitats and Species Regulations 2010 (as amended, 2018) [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 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] that aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In addition, Government guidance 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. The HRA process must be applied before a plan or project that might affect a European Site can be adopted or authorised.

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 Government⁹ 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:** Mitigations Measures and Alternatives Assessment

⁹ 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 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 Natural England produced draft additional, detailed guidance on the HRA of Local Development Documents (Tyldesley, 2009 (as updated)) that complements the DCLG guidance and builds on assessment experience and relevant court rulings. The guidance sets out criteria to assist with the screening process; addresses the management of uncertainty in the assessment process; and importantly outlines that for the HRA of plans; '*... what is expected is as rigorous an assessment as can reasonably be undertaken in accordance with the requirements of the Regulations ...*'.
- 2.7 Significant effects on European sites are often associated with disturbance and increased emissions from increased traffic arising from new development, and 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 guidance¹⁰ 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 11¹¹ 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 case¹², Wealden District Council argued that whereas its Core Strategy (WCS) had been prepared on the basis that it would generate 950 AADT on part of the A26 road next to the SAC, the effect of the JCS would be to increase the AADT beyond the 1000 threshold and on a proper

¹⁰ http://www.midsussex.gov.uk/media/78886/189_wealdenappendixb.pdf

¹¹ <http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/index.htm>

¹² <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html>

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) with the JCS adopted in December 2017.
- 2.13 On 13 July 2018, NE published internal guidance¹³ regarding air quality and HRA; it may be noted that the 200m distance from the roadside remains under review. This situation with the guidance provided by the regulators has been taken into account for this revised HRA screening and appropriate assessment of the Gloucester City Plan.

Method

- 2.14 The approach taken for the HRA of the GCP 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.

¹³ <http://publications.naturalengland.org.uk/publication/4720542048845824>

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 Gloucester City Plan

Vision & Key Principles

- 2.14 The Gloucester City Plan has an identified Vision and strategic Key Principles to help deliver this Vision. These are as follows:

Vision:

“Between 2016 and 2031 the City Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.

During this time significant progress will have been made in the regeneration of the City Centre and elsewhere within the City. Gloucester will be a flourishing, healthy, modern and ambitious City, where people feel safe and happy in their community and are proud to live and work.

Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location. The City Council will work with partners and neighbouring authorities to ensure that the economic development required beyond its boundary benefits Gloucester, while at the same time, supporting business growth and expansion within the City itself.

A significant number of new decent homes will have been delivered in a way that reflects the type and tenure needed by the local community and that supports economic growth.

Health and wellbeing will be a key consideration in all planning decisions ensuring the protection and provision of active streets, open spaces, playing fields, community infrastructure, environmental quality, connectivity and access.

New development will be built to the highest possible standard of design and will be focused on protecting the quality and local distinctiveness of the City.

Gloucester's unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy."

Key Principles:

1. Ensure that new development contributes to the delivery of a transforming City which brings regeneration benefits, promotes sustainable development and makes the most efficient use of brownfield land and buildings and the reuse of vacant buildings.
2. Ensure that new development is supported by the necessary infrastructure.
3. Regenerate and develop the City Centre and other areas of the City in a way that responds to and meets the needs of the 21 st century and builds upon strengths such as heritage and the waterside location.
4. Build on existing strengths to create a distinctive, diverse and innovative cultural, arts, tourism and sporting offer.
5. Encourage a vibrant and safe evening and night-time economy that appeals to all age groups and encourages more overnight visitors.
6. Provide a balanced mix of new homes that provide for the needs and aspirations of the existing and future community.
7. Encourage and facilitate inward and home grown investment, attract innovative growth sectors, create high and stable levels of economic growth and productivity, and increase jobs and skills development opportunities.
8. Improve educational attainment, skills and learning opportunities.
9. Protect and enhance the City's leisure, recreation and environmental assets, including the historic environment, public open spaces, woods and trees, allotments, areas of nature conservation, sensitive landscapes, playing fields and sporting facilities.
10. Deliver development that achieves high quality design that reduces crime and the fear of crime, builds positively on local distinctiveness and contributes to the creation of an active, connected and sustainable City.
11. Ensure that development minimises its impact on climate change through sustainable construction and design, encourages the use of sustainable forms of transport and integrates with and makes the most of existing infrastructure.
12. Improve health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multifunctional green infrastructure and community facilities.
13. Tackle poverty and deprivation in the worst affected areas of the City

Level and Distribution of Growth

- 2.15 The JCS Policy SP1 sets out that at least 14,359 new homes will be needed in the Gloucester City area over the plan period 2011 to 2031. As of April 2019, 3,993 homes have already been delivered since 2011 and there are 2,339 commitments. 972 dwellings are proposed through the site allocations SA01- SA22 in GCP with a number of the bigger sites being central brownfield sites in need of regeneration. 620 new homes will be delivered through the Winneycroft Strategic Allocation south of Matson estate in Gloucester and 4,520 through the Strategic Allocations in Tewkesbury Borough allocated to meet Gloucester's housing need. A further 375 dwellings within these Strategic Allocation are projected to be delivered after 2031.
- 2.16 Despite this provision there is a shortfall for Gloucester of over 1,000 dwellings in the later years of the JCS timeframe. It is likely that some of this shortfall will be made up through sites or opportunities that come forward in Gloucester, but some of the provision is likely to be found through the JCS Review process.
- 2.17 Windfall development in Gloucester will have to accord with GCP Development Management policies that will, alongside those in the JCS, guide development over the plan period to 2031.

Local Policies & Site Allocations

- 2.18 The GCP is presented in eight chapters that cover themes, as follows:
- A Housing
 - B Employment Development, Culture & Tourism
 - C Healthy Communities
 - D Historic Environment
 - E Natural Environment
 - F Design
 - G Sustainable Living, Transport & Infrastructure
 - Site Allocations SA01-SA22

3.0 HRA SCREENING REVISED

The GCT Joint Core Strategy HRA (2013)

- 3.1 The adopted 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 Cotswold 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 further studies such as 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 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 the environmental regulator Natural England regarding the potential recreational impacts on the Cotswold Beechwoods SAC and proposed mitigation measures. However, this was resolved through a HRA Addendum Report¹⁴ (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and Natural England. No further concerns were raised during examination of the JCS and the strategic HRA was found sound with the adoption of the JCS in December 2017. Thus, it can be concluded that the strategic development proposed for Gloucester in the JCS will not have adverse effects on the identified European sites, alone or in combination with other plans and projects.

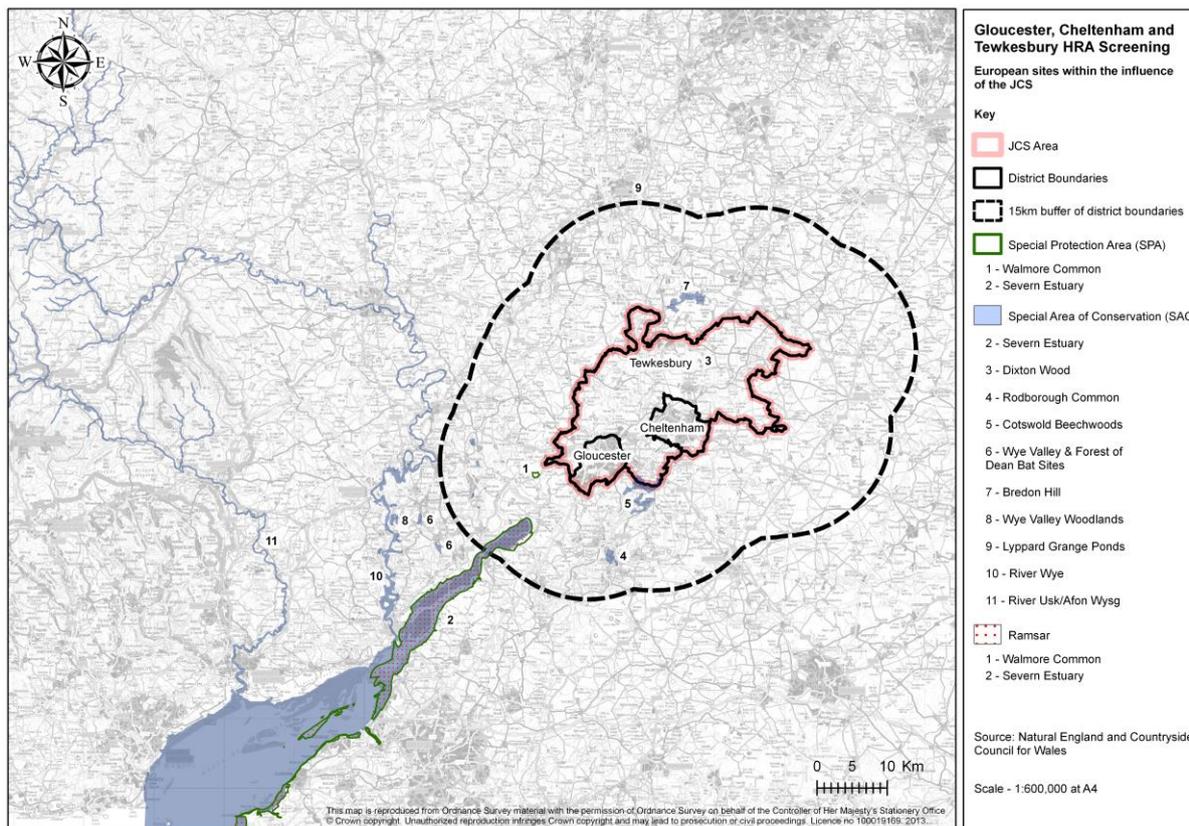
Identification of European Sites

- 3.4 Many of the European sites that were scoped into the HRA for the GCT JCS are also applicable for consideration in the HRA of the GCP. Several of these sites are over 15km from the City and therefore, have been scoped out of this HRA: the Bredon Hill, Lyppard Grange Ponds, River Usk, River Wye, Wye Valley Woodlands and Dixton Wood European sites. The European sites that have been included in the HRA of the GCP are as follows:
- Cotswold Beechwoods SAC
 - Rodborough Common SAC
 - Severn Estuary SAC
 - Wye Valley and Forest of Dean Bat Sites SAC

¹⁴ <http://www.gct-jcs.org/Documents/Examination-Document-Library/SAPR119A-HRA-Addendum-Cotswold-Beechwoods.pdf>

- Severn Estuary SPA
- Walmore Common SPA
- Severn Estuary Ramsar

3.5 The location of these Sites is shown in the Figure 3.1¹⁵, as follows:



Screening the Regulation 18 Gloucester City Plan (2016)

- 3.6 An initial HRA Screening was completed in October 2016 for the emerging Draft GCP with Regulation 18 consultation during January-February 2017¹⁶. The initial screening considered the characterisation of the European sites that should be included in the HRA – the designated features of the sites, conservation objectives, and the existing threats and vulnerabilities for the sites. The screening considered other relevant plans and projects that could have likely significant in-combination effects with the Gloucester City Plan, and an assessment of the emerging draft Policies in the GCP.
- 3.7 The initial HRA screening was subject to consultation and representations were received from the environmental regulators Natural England (NE) and the Environment Agency (EA). NE advised¹⁷ that there is growing awareness of the potential for growth across Stroud District, Tewkesbury Borough, Gloucester City and the Cotswold District to result in additional recreational

¹⁵ <https://www.jointcorestrategy.org/jcs-examination-document-library>

¹⁶ <http://consult.gloucester.gov.uk/consult.ti/draftgloucestercityplan/consultationHome>

¹⁷ NE representation (27 February 2017) to Regulation 18 consultation HRA Report; please see also Appendix VI Integrated Appraisal Report (April 2019)

pressures on the Cotswold Beechwoods SAC. Natural England is at the start of a process to better understand the nature and scale of these potential impacts, and what action, if any, is required; NE will be working closely with the relevant Local Authorities. NE did not agree with the conclusion of the Initial HRA (October 2016) that ruled out impacts based on their local scale and nature, together with mitigation provided by GCP and JCS Policies. NE commented that there is no established zone of influence for recreational pressures on the Cotswold Beechwoods SAC or an evidence-based understanding of what scale of development would trigger impacts.

- 3.8 The JCS authorities and NE have continued to discuss this matter through the concluding period of the GCT JCS examination in 2017, and subsequently through 2018 into 2019. This HRA Report accompanying the Pre-Submission GCP has built upon the initial work and has been updated to take account of the modifications and adoption of the JCS (December 2017) and revised to take account of recent case law including the Sweetman CJEU (April 2018) that has changed the way in which HRAs are undertaken in the UK; it also incorporates the recent discussions with NE and recreational/visitor studies being undertaken with Stroud DC.
- 3.9 NE also advised about the growing awareness of the potential for recreational pressures to impact on the Severn Estuary Special Area of Conservation (SAC)/Special Protection Area (SPA)/Ramsar site, particularly on the bird populations for which the SPA and Ramsar site are designated. Whilst the site's designated boundaries are some distance away (8.1km), the Gloucester City Plan area abuts the River Severn. The river is functionally linked to the designated site and the life and productivity of the SPA birds. As of yet there is no established zone of influence for recreational pressures on the Severn Estuary SAC/SPA/Ramsar site in Gloucester City or an evidence-based understanding of what scale of development would trigger impacts.
- 3.10 The Environment Agency advised that they had no specific comments on the HRA at the Regulation 18 stage. They noted that they had made comments regarding the HRA and comments on foul drainage infrastructure/IDP as part of the JCS process – now resolved through completion of examination and the adoption of the GCT JSC in December 2017. The EA commented that they would expect NE to lead on comments on the HRA.
- 3.11 Stroud District Council (SDC) questioned whether increased development in Gloucester could actually result in significant increases in recreational disturbance on the Cotswold Beechwoods SAC. SDC considered this might be more likely with regard to the Severn Estuary SAC/SPA/Ramsar with features that are more susceptible to such an effect. SDC advised of studies being undertaken for the Stroud Local Plan Review that would be useful to inform the HRA of the next draft of the GCP. This HRA has also taken into account the comments received from the EA and SDC, with thanks.

Characterisation of Identified European Sites

- 3.12 A general overview of the European sites scoped into the assessment is provided below in Table 3.1. More detailed characterisations including conservation objectives and the specific vulnerabilities for each site are provided in Appendix I.

Table 3.2: Identified European Site Summary Characterisations

<p>Cotswold Beechwoods SAC</p> <p>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.</p>
<p>Rodborough Common SAC</p> <p>Rodborough Common is the most extensive area of semi-natural dry grassland in the Cotswolds, and represents CG5 <i>Bromus erectus</i> – <i>Brachypodium pinnatum</i> grassland. The area is a designated SAC due to the presence of semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) on the site. The site has a number of vulnerabilities including recreational activities and grazing activities.</p>
<p>Severn Estuary SPA/SAC/Ramsar</p> <p>The Severn Estuary SPA/SAC/Ramsar is the largest coastal plain estuary in the UK with extensive mudflats and sandflats, rocky shore platforms, shingle and islands. Saltmarsh fringes the coast, backed by grazing marsh with freshwater and occasional brackish ditches. The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have the second highest tidal range in the world (after the Bay of Fundy in Canada) at more than 12 metres. This tidal regime results in plant and animal communities typical of the extreme physical conditions of strong flows, mobile sediments, changing salinity, high turbidity and heavy scouring. The resultant low diversity invertebrate communities, that frequently include populations of ragworms, lugworms and other invertebrates in high densities, form an important food source for passage and wintering birds.</p> <p>The site is important in the spring and autumn migration periods for waders moving along the west coast of Europe, as well as in winter for large numbers of water birds including swans, geese, ducks and waders. These bird populations are regarded as internationally important. The Severn Estuary SPA/SAC/Ramsar has a number of vulnerabilities including changes in abiotic conditions, changes in hydraulic conditions and industrial activities.</p>
<p>Wye Valley & Forest of Dean Bat Sites SAC</p> <p>The Wye Valley and Forest of Dean Bats SAC straddles the Wales-England border and covers an area of 142.7ha. The SAC contains by far the greatest concentration of lesser horseshoe bat <i>Rhinolophus hipposideros</i> in the UK, totalling about 26% of the national population. The site also supports the greater horseshoe bat <i>Rhinolophus ferrumequinum</i> in the northern part of its range, with about 6% of the UK population. The site has a number of vulnerabilities including recreational activities and ecosystem modifications.</p>
<p>Walmore Common SPA</p> <p>Walmore Common is located 10km South-West of Gloucester. The site is a wetland overlying peat providing a variety of habitats including improved neutral grassland,</p>

unimproved marshy grassland and open water ditches. The site is an important location for of Bewick's Swan *Cygnus columbianus bewickii*. The site has a number of vulnerabilities including recreational activities and changes in biotic conditions.

Other Plans, Programmes & Projects

- 3.13 A review of other plans, programmes & projects in and around the Gloucester plan area was undertaken in 2016 to consider the potential for significant in-combination effects. This was updated in early 2019 and details are provided in Appendix II of this HRA Report. The review found that a number of plans could have a variety of interactions with the emerging draft GCP. These potential significant effects include impacts on air pollution through increased traffic; increased levels of disturbance through recreational activities and noise and light pollution; increased levels of water abstraction and impacts on water quality through increased wastewater discharge – resulting in changes to water levels and quality.

The Effects of The Plan

- 3.14 As with the GCT JCS, the GCP has an emphasis on jobs and economic prosperity and a key element of the plan is the delivery of 14,350 new homes over the plan period to 2031. The GCP proposes site allocations for local housing and employment development and policies to guide such local development. Housing, employment and infrastructure development has the potential to generate a range of environmental effects that could have impacts on European sites, as summarised in Table 3.3, as follows:

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

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

3.15 The first stage in the screening process (Table 2.1 above) considered the likely significant effects (LSEs) arising from implementation of the policies and site allocations within the Plan - and whether these have the potential to lead to potential impacts. The revised screening identified certain GCP Policies for which some impacts could potentially lead to significant effects (please see details in Appendix III). The policies and potential impacts are summarised, as follows:

Table 3.4: GCP Policies identified as having impacts that could lead to LSEs

Policy/ Allocation	Potential Impacts of the Policy/Allocation
Policy B4: Development within & adjacent to Docks & Canal	<p>The Policy guides development within or adjacent to the Gloucester Docks and the Gloucester & Sharpness Canal.</p> <p>It is considered that such development has the potential to impact on the River Severn Ramsar/SAC/SPA through:</p> <ul style="list-style-type: none"> ▪ increased levels of disturbance – noise and light pollution ▪ changes to water levels and/or water quality ▪ changes to the supporting habitat of functionally linked land
Policy E7: Renewable Energy Potential of River & Canal	<p>The Policy supports development that exploits the renewable energy potential of the river or canal, and resists development that discourages this potential.</p> <p>It is considered that renewable energy development associated with the River Severn has the potential to impact upon the River Severn Ramsar/SAC/SPA through:</p> <ul style="list-style-type: none"> ▪ increased levels of disturbance – recreational activity, air, noise and light pollution ▪ changes to water levels and/or water quality
Policy G6: Tele- communications Infrastructure	<p>The location of any such developments is unknown at this stage and therefore, the Policy has the potential to result in:</p> <ul style="list-style-type: none"> ▪ increased levels of disturbance - noise and light pollution during construction ▪ land take, which could lead to the loss and fragmentation of habitats
Site Allocations SA01- SA22 Mixed Use, Employment & Housing Site Allocations	<p>The policies make provision to meet with the JCS Policy SP1 setting out that at least 14,359 new dwellings will be needed in the Gloucester city area over the plan period from 2011 to 2031.</p> <p>The Site Allocations have the potential to result in:</p> <ul style="list-style-type: none"> ▪ atmospheric pollution through increased traffic that could reduce air quality ▪ increased levels of disturbance - recreational activity, noise and light pollution ▪ surface water run-off and sewage discharge, which could reduce water quality and levels ▪ land take, which could lead to the loss and fragmentation of habitats

- 3.16 HRA screening, as detailed in 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 and as detailed in Appendix III) 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. The following discussion considers the potential for LSEs from identified GCP Policies and then considers the need for further appropriate assessment.

Screening Assessment: Housing, Mixed Use & Local Employment Developments

- 3.17 The Cotswold Beechwoods SAC is sensitive to changes in air quality and the A46 is within 200m of the site. Proposed development has the potential to increase traffic with the potential for short-range atmospheric pollution. Most Site Allocations are over 5km from the designated site with two allocations SA01 and SA15 about 3km away. Taking into account the local size of the allocations and their distance from the SAC, it is unlikely that there will be LSEs from allocations alone. However, the screening identified some uncertainty for in-combination effects for these two allocations with their proximity to the Beechwoods SAC.
- 3.18 The Cotswold Beechwoods SAC is also sensitive to increases in recreational disturbance. It is unlikely that there will be a significant increase in recreational activity from individual site allocations that are nearby due to their local size. However, there is the potential for the policies to act in combination with plans, specifically the Stroud Local Plan Review. The site is not sensitive to impacts associated with water quality/levels. It is sensitive to loss of fragmentation of habitat; the site allocations are outside the designated site and will not involve any landtake of habitat, including supporting habitats.
- 3.19 Rodborough Common SAC is over 15 km to the south east and the other side of the M5 from Gloucester; the site is designated for its dry grasslands and scrublands and is sensitive to recreational pressures. Taking into account the sensitivities of the site, its distance from the Site Allocations and their local size, it is considered that the proposed developments will not lead to any LSEs – alone or in-combination.
- 3.20 The designated area of the Severn Estuary SAC/SPA/Ramsar is some 8 km south of the GCP area. However, SPA/Ramsar birds continue using the estuary and river beyond the designation. As advised by NE, the river is functionally linked to the designated site and the life and productivity of the SPA birds. Sites SA09 and SA21 are within 200m of the River Severn/Gloucester & Sharpness Canal that is connected to the River Severn and its wetlands. Therefore, it is possible that there are pathways for short range atmospheric pollution to functionally linked areas. GCP Policy B4 that guides new development within and adjacent to the Docks and Canal could cause disturbance through noise and light pollution, also changes to water quality

and water levels, and with the potential to affect functionally linked land and supporting habitat.

- 3.21 Site Allocations SA09, SA12, SA21 and SA22 are close to the River Severn/Gloucester & Sharpness Canal where there is existing noise, light and recreational activity. It seems unlikely that there will be a significant increase in recreational activity on the functionally linked land and water arising from each of these site allocations alone – due to their local small size and distance from the designated area. Other Site Allocations are approximately 750m or over 3km away from the river and canal such that significant increase in recreational activity unlikely alone. However, some uncertainty with regard to in-combination effects for recreational disturbance from all the Site Allocations and other plans from neighbouring authorities, in particular the Forest of Dean and Stroud District Councils.
- 3.22 The Severn Estuary SAC/SPA/Ramsar is vulnerable to changes in hydraulic conditions and water quality. Although the designated estuary area is outside the GCP area, there are many watercourses within the Gloucester area that eventually flow into the River Severn and therefore there are pathways for potential LSEs on water quality and levels. Site Allocations SA09, SA11 and SA21 are within the Water Framework Directive (WFD) Drinking Water Protected Area (surfacewater)¹⁸ indicating a risk of pollution and the need to protect water quality and therefore, potential for LSEs alone and in-combination.
- 3.23 Site Allocations SA02, SA07, and SA12 are located close to watercourses; however, LSEs alone are unlikely due to the small size of the development and their distance from the area functionally linked to the designated sites. Some uncertainty about potential for in-combination effects. Other Site Allocations are approximately 750m or more than 3km away from the river and canal; outside of the WFD Protection Zone; and some 8km away from the designated site. It is unlikely that these allocations would cause LSEs due to their local size and distance from the area functionally linked to the designated site. Some uncertainty about the potential for in-combination effects.
- 3.24 Site Allocations will not lead to the loss or fragmentation of habitat through landtake. Site Allocations SA09 and SA21 are near to the River Severn and the Alney Island Local Nature Reserve (LNR) – that may be important functionally linked land. Therefore, some potential for LSEs on supporting habitat.
- 3.25 The Wye Valley & Forest of Dean Bat Sites SAC is located some 20 km outside of the GCP area and designated for the maternity bat roosts in the disused mines. Whilst the site is vulnerable to light/noise pollution and other recreational disturbance, it is unlikely that there will be significant increase in recreational activity due to the size and distance away of the Site Allocations.

¹⁸ <https://magic.defra.gov.uk/magicmap.aspx> [accessed March 2019]

3.26 Walmore Common SPA is located approximately 4km to the south and west from nearest boundary of the GCP area and some 10 km from the centre of Gloucester City. The site is designated for overwintering of Bewick's Swan. None of the Site Allocations are within 5km of the designated site and therefore LSEs are not indicated due to the small size of the developments and their distance away. However, some potential for LSEs in combination with regard to changes in air quality, increases in recreational disturbance and water levels/quality.

Screening Assessment: Renewable Energy & Telecommunications Developments

3.27 GCP Policy E7 Renewable Energy Potential of River & Canal has the potential to lead to changes in water levels and quality, together with potential effects on functionally linked land/supporting habitat; also increased air, noise and light pollution and thus, potential for environmental pathways and LSEs.

3.29 Telecommunications development as supported through GCP Policy G6 has the potential for LSEs with regard to trenching, provision of masts/towers and associated buildings. Any effects are likely to be limited and will depend upon the location, size and precise type of such development. Therefore, some uncertainty of LSEs alone or in-combination.

Screening Assessment: Overall

3.30 The potential impacts (Table 3.3) arising from the draft GCP Policies (Appendix III) were investigated against the characteristics of the identified European Sites (Appendix IV) to determine if there is the potential for likely significant effects (LSEs). Table 3.6 provides the key to Table 3.5 that summarises the results of the screening assessment overall, as follows:

European sites	Potential Likely Significant Effects (LSEs)							
	Air Quality		Disturbance		Water Levels & Quality		Habitat Loss & Fragmentation	
	A ¹⁹	IC ²⁰	A	IC	A	IC	A	IC
Cotswold Beechwoods SAC	No	?	No	?	No	No	No	No
Rodborough Common SAC	No	No	No	No	No	No	No	No
Severn Estuary SAC/SPA/Ramsar	?	?	No	?	?	?	?	?

¹⁹ AA required alone?

²⁰ AA required in combination?

Walmore Common SPA	No	?	No	?	?	?	No	No
Wye Valley and Forest of Dean Bat Sites SAC	No							

Table 3.5: HRA Screening Summary

Table 3.6: Screening Summary Key

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

Air Quality

- 3.31 There is the potential for increased traffic along the A46 which is within 200m of the Cotswold Beechwoods SAC. Commuter travel and significant changes to air quality from vehicle emissions is unlikely with two nearest housing (SA01 & SA15) allocations some 3 km away and the other allocations over 5 km from the designated site. However, some uncertainty of effects in-combination with other plans/projects, particularly with the emerging Stroud Local Plan Review and the Cotswold Local Plan (adopted 2018).
- 3.32 Gloucester City is some 8 km distance from the Severn Estuary SAC/SPA/Ramsar area and proposed development is not considered likely to result in significant increase along any major roads that are within 200m of the designated area. However, SPA/Ramsar birds use the river upstream and this is functionally linked to the site and it is the corridor that the birds use for migrations to land such as Ashleworth Ham. Alney Island, which lies immediately to the west of the Gloucester City Plan area, is thought to be a key wetland and stepping stone along the river²¹. Sites SA09 & SA21 are within 200m of the River Severn/Gloucester & Sharpness Canal. Therefore, it is possible that there are pathways for short range atmospheric pollution to functionally linked areas, with the potential for LSEs alone and in-combination. Proposed development utilising the renewable potential of the river and canal could lead to increased traffic within 200m of the watercourses, particularly during the operational phases.
- 3.33 A small proportion of the Walmore Common SPA site lies in close proximity (within 200m) to the A48, passing to its east and south. There is potential for proposed development to increase the level of traffic along the A48, indicating a pathway for short range atmospheric pollutants. The GCP allocates local sites and most are within the city urban area; none are within 5km of the SPA. The proposed individual developments would not result in significant increased traffic due to their location and size. There is the

²¹ As advised by Natural England in representation comments to Regulation 18 consultation HRA Report (October 2016)

potential for the policies to act in combination with other plans and projects, including those of neighbouring authorities.

- 3.34 No environmental pathways were identified for development proposals and the other designated sites – Rodborough Common SAC and Wye Valley & Forest of Dean Bat Sites SAC – and no likely significant effects alone or in-combination.

Disturbance

- 3.35 The Cotswold Beechwoods SAC is sensitive to increased disturbance – recreational activity, and noise and light pollution; most of the site is open access land for people on foot with a network of footpaths/bridleways and the route of the Cotswold Way National Trail. The site lies approximately 3 km outside of the Plan area so there are no pathways for noise and light pollution. It is unlikely that there will be a significant increase alone in recreational activity from the two individual site allocations (SA01 & SA15) that are nearby due to their local size. However, some uncertainty about the in-combination effects from GCP allocations acting with other plans, especially the emerging Stroud Local Plan and the Cotswold Local Plan.
- 3.36 The designated Severn Estuary SAC/SPA/Ramsar site lies some 8 km outside of the GCP plan area to the south-west so there are no pathways for noise and light pollution. GCP Site Allocations SA09 & SA21 are close to the River Severn/Gloucester & Sharpness Canal where there is existing noise, light and recreational activity. It seems unlikely that there will be a significant increase in recreational activity on the functionally linked land and water arising from each of these site allocations alone – due to their local small size and distance from the designated area. However, some uncertainty about LSEs in-combination.
- 3.37 The Walmore Common SPA is located some 4 km to the south-west of the nearest boundary of the GCP plan area so limited pathways for noise and light pollution. It is considered that any significant increase in recreational activities is unlikely due to the locations of Site Allocations some distance away and their local size. However, some uncertainty about LSEs in-combination.
- 3.38 Whilst both the Rodborough common SAC and the Wye Valley & Forest of Dean Bat Sites SAC are vulnerable to disturbance, it is considered that there will be no LSEs from the GCP proposed development due to its distance from the designated sites and the relatively small local levels of proposed development.

Water Levels and Quality

- 3.39 The Cotswold Beechwoods SAC and Rodborough Common SAC are not vulnerable to changes in hydraulic conditions. Although the Wye Valley & Forest of Dean Bat Sites SAC is vulnerable to such changes, it some 20 km

away from the GCP plan area and therefore, no environmental pathways are indicated.

- 3.40 Although the designated Severn Estuary SAC/SPA/Ramsar site lies some 8 km outside of the GCP plan area to the south-west, there are many water courses within the Gloucester area that eventually flow into the River Severn and therefore there are pathways for potential LSEs on water quality as the site is vulnerable to changes in hydraulic conditions and water quality. Site Allocations SA09, SA11 & SA21 within the Water Framework Directive (WFD) Drinking Water Protected Area (surfacewater)²² indicating a risk of pollution and the need to protect water quality. Therefore, some potential for LSEs alone and in-combination. Site Allocations SA07, SA12 & SA02 are associated with watercourses but it is considered that these allocations would cause LSEs due to their small size and distance from the area functionally linked to the designated site. The other Site Allocations are approximately 750m or more than 3 km away from the river and canal, and outside the WFD Protection Zone. Therefore, LSEs unlikely alone due to small local size and distance from the area functionally linked to the designated site. Some uncertainty for LSEs in-combination.
- 3.41 The GCP Renewable Energy Potential of the River & Canal Policy E8 has the potential for changes to water levels and quality – effects depend upon location, size and precise type of development and therefore, uncertainties of LSEs alone and in-combination.
- 3.42 The Walmore Common SPA is some 4 km away from the nearest part of the GCP plan area; it is vulnerable to changes in hydraulic conditions. Whilst the River Severn is functionally linked to the wetlands of the SPA, it is unlikely that the proposed developments would have any significant effects due to their local size and distance from the site. Proposed developments utilising the renewable energy potential of the river and canal through GCP Policy E8 is likely to lead to changes in water levels and quality. Therefore, uncertainties of LSEs alone or in-combination.

Habitat Loss & Fragmentation

- 3.43 None of the Site Allocations are likely to lead to direct or indirect loss or fragmentation of designated land or supporting habitat for Cotswold Beechwoods SAC, Rodborough Common SAC, Walmore Common SPA, and the Wye Valley & Forest of Dean Bat Sites SAC.
- 3.44 None of the proposed development will lead to direct loss or fragmentation of designated land for the Severn Estuary SAC/SPA/Ramsar. For most of the GCP Site Allocations, their local size and distance from the functionally linked land indicate no LSEs on supporting habitat. However, Site Allocations SA09 & SA21 are near to the River Severn and the Alney Island Local Nature Reserve – that may be important functionally linked land; also, Policy E8 may affect

²² <https://magic.defra.gov.uk/magicmap.aspx> [accessed March 2019]

functionally linked land. Therefore, some potential for loss or fragmentation of supporting habitat – alone and in-combination.

Further Assessment Needed?

- 3.45 The screening assessment identified uncertainty with regard to the potential for likely significant effects (LSEs), as follows:
- Cotswold Beechwoods SAC as a result of changes to air quality and increased recreational disturbance
 - Severn Estuary SAC/SPA/Ramsar as a result of changes to air quality, increased recreational disturbance, changes to water levels and quality, and loss or fragmentation of supporting habitat
 - Walmore Common SPA as a result of changes to air quality, increased recreational disturbance, and changes to water levels and quality.
- 3.46 Some significant effects are considered to be possible alone but mostly effects 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 and considers if the likely significant effects (LSEs) 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 measures provided by other Plan Policies, including Development Management Policies – in the GCT JCS and the GCP. Appendix IV details the results of the HRA screening process for the GCP, revised in line with the CJEU on HRA (April 2018) and as summarised previously in Table 3.5.
- 4.2 The screening of the GCP (Appendix III & IV) and the review of plans, programmes and projects in-combination study (Appendix II) undertaken at the screening stage identified areas of impact arising that may have significant effects in-combination with other plans or projects on the identified European sites: air quality; recreational disturbance; changes in water levels & quality; and loss or fragmentation of supporting habitats. Each of these issues is investigated further below:

Air Quality

- 4.3 The screening identified that there is some uncertainty with regard to the potential for likely significant effects in-combination, including with the emerging Stroud Local Plan Review and the Cotswold Local Plan. The beechwoods and grasslands of the **Cotswold Beechwoods 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 (March 2015)²⁴ identifies air pollution and the impacts of atmospheric nitrogen as a pressure. It may be noted that the delivery bodies to address this issue have yet to be determined.
- 4.4 Most of the Site Allocations are around the central area of Gloucester City and at least some 6-7 km distant to the west of the A46 and M5. Residents in these new developments are more likely to be employed in the main centre of Gloucester and thus less likely to use the A46 for commuter travel. Two allocations SA01 and SA15 are within around 3 km of the entrance to the Cotswold Beechwoods; the numbers of new dwellings are around 40 indicating that the increase in commuting vehicles on the A46 is unlikely to be significant. As regards recreational travel, it seems unlikely that residents in the centre of the City would travel across to the Beechwoods for regular walking/dog walking activities.
- 4.5 The Gloucester City Plan needs to be considered in the context of the GCT JCS and its accompanying HRA Report. JCS Policy INF1 Transport Network

²³ Air Pollution Information System (2012) Site Relevant Critical Loads. Online at <http://www.apis.ac.uk/> [Accessed October 2016 & March 2019]

²⁴ <http://publications.naturalengland.org.uk/publication/6276086220455936>

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.

- 4.6 GCT 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 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 and likely to be the only major development in the JCS that might act in-combination with the GCP on the A46.
- 4.7 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 Note²⁵ (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.
- 4.8 GCP Policy C5 Air Quality seeks to protect air quality and requires air quality assessment where appropriate- thus, it provides further mitigation measures to protect the environment from air pollution. GCP Policy G2 Sustainable Transport encourages the use of walking/cycling and public transport to reduce traffic emissions. It may be noted that the initial HRA (November 2018)²⁶ of the emerging Stroud Local Plan Review is using a 400m zone to highlight potential air quality and urbanisation effects; in lieu of pending survey work for Cotswold Beechwoods, a 5km zone is being used for potential recreational impacts. It may also be noted that the Appropriate Assessment²⁷ of the Cotswold Local Plan concluded that it will not have adverse effects on the integrity of the Cotswold Beechwoods SAC in relation to air pollution. In consideration that the Site Allocations in the GCP are unlikely to significantly increase traffic within 200m of the SAC and taking into account the Stroud and Cotswold Local Plans, it may be concluded that the GCP will not have adverse effects caused by atmospheric pollutants on the integrity of the Cotswold Beechwoods SAC, alone or in-combination.
- 4.9 Commitments were made by the JCS authorities for further transport and air quality studies. The JCS was found sound subject to an immediate partial

²⁵ <http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/Main-Modifications-Examination-Documents/MM27-HRA-Note-14072017.pdf>

²⁶ <https://www.stroud.gov.uk/media/970711/final-stroud-local-plan-hra-16-11-18-emerging-strategy-consultation.pdf>

²⁷ <https://www.cotswold.gov.uk/media/1500069/Updated-HRA-Report-for-Local-Plan-Focussed-Changes.pdf>

Review, further indicating that studies would continue. The JCS authorities, and the Gloucester City 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 GCP – further confirming that there is embedded/integrated policy and strategic mitigation measures in place.

- 4.10 As studies to inform the strategic mitigation plan are ongoing, the Gloucester City Council has prepared new policy to provide clear mitigation measures in respect of potential adverse effects from proposed local development. Policy E8 Development affecting Cotswold Beechwoods Special Area of Conservation (SAC) sets out that development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the SAC – alone or in-combination. The Policy E8 sets out potential mitigation measures and the supporting text explains the situation with the proximity of the A46 to the SAC and advises development to take account of the NE guidance on assessing traffic impacts for HRA (NEA001).
- 4.11 The **Severn Estuary SAC/SPA/Ramsar** is vulnerable to nitrogen deposition, although critical loads for nitrogen are not being exceeded at this site for those features that have critical loadings²⁸. GCP Site Allocations SA09 and SA21 are within 200m of the River Severn/Gloucester & Sharpness Canal, which is functionally linked to the designated estuary area, some 8 km away. However, it is considered that the proposed development will not increase traffic generated emissions significantly since there is embedded policy mitigation (as described above); the proposed development is relatively small and located within the City Centre where there is good access to services and facilities through sustainable transport modes such that use of private motor vehicles are less likely. It may be concluded that the GCP will not have adverse effects caused by atmospheric pollutants on the integrity of the Severn Estuary SAC/SPA/Ramsar, alone or in-combination.
- 4.12 A small proportion of the **Walmore Common SPA** site lies within 200m of the A48, passing to its east and south. There is potential for proposed development to increase the level of traffic along the A48. Critical load information²⁹ is not available for the habitat of the Bewick's Swan for which the site is designated. The GCP allocates local sites and most are within the city urban area; none are within 5km of the SPA. The proposed individual developments would not result in significant increased traffic due to their size and location over 5km distance. There is also other policy to provide mitigation measures (as described above). It may be concluded that the GCP will not have adverse effects caused by atmospheric pollutants on the integrity of the Walmore Common SPA, alone or in-combination.
- 4.13 Overall, it is concluded that the policy and embedded mitigation measures in the GCP will ensure that there no adverse effects on designated sites associated with changes to air quality – alone or in-combination.

²⁸ <http://www.apis.ac.uk/> [accessed March 2019]

²⁹ Ibid

Disturbance

- 4.14 The screening assessment concluded that there is some 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 Plan³⁰ identifies that public access/disturbance is a priority threat as public use of the Beechwoods has grown considerably in recent years and damage is becoming more widespread. A particular increase has been the use of mountain bikes and horse riding which use the woods far beyond the limited network of bridleways. This has created numerous additional trackways, increasing the erosion of ground flora and potentially risk of water erosion. Additionally, dog walking has increased, especially at Cooper's Hill where car parking is available – and with a particular issue from professional dog walkers who release large numbers of dogs to run uncontrolled through the woods. The intention is to develop a mitigation strategy and the delivery bodies have been determined as Gloucestershire County Council, the National Trust, Natural England, and Tewkesbury Borough Council.
- 4.15 At the examination of the GCT 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.
- 4.16 GCT JCS Policy SD9 Biodiversity provides mitigation measures to protect important biodiversity from new development. JCS Policy INF3 Green Infrastructure 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.

³⁰ <http://publications.naturalengland.org.uk/publication/6276086220455936>

- 4.17 The HRA for the GCT JCS (adopted December 2017) concluded that there was sufficient mitigation at the strategic level through policy and location/design of new development to accommodate the overall need for approximately 35,175 new homes. This includes the strategic allocations³¹ located at the urban edges of Gloucester City: A1 Innsworth & Twigworth; A2 South Churchdown; A3 North Brockworth; and A6 Winnycroft, together with the housing requirement identified for the GCP area of 14,359 new homes (JCS Policy SP1 the Need for New Development).
- 4.18 Strategic mitigation is provided through the GCT JCS policies, including SD9 Biodiversity, INF3 Green Infrastructure, and site-specific requirements that will ensure access and appropriate recreational facilities for the strategic allocations. GCP Policies E2 Biodiversity, E4-E5 on trees and Green Infrastructure will contribute to the enhancement of the wider biodiversity resource. GCP Policy E2 Biodiversity & Geodiversity has been significantly expanded for the Pre-Submission stage and includes a section on internationally designated sites that requires development to ensure that there will be no adverse effects on integrity of internationally designated sites – alone or in-combination. This provides strong mitigation measures.
- 4.19 Natural England³² had not agreed with the conclusion of the initial HRA screening (2016), advising that the commitment in the JCS provided a route for possible mitigation but that the delivery of such measures has not yet been secured. NE advised that mitigation needs to be secured either on a case by case basis through individual plans and projects or, ideally, through a strategic project to deliver a landscape scale solution. Natural England advised that there is as yet no established zone of influence for recreational pressures on the Beechwoods. Since the boundary of the plan area is only 2.4 km from the SAC and allocates some 14,350 dwellings, NE could not agree with ruling out impacts based on their local scale and nature.
- 4.20 It is understood that Cheltenham Council met with Stroud District Council in June 2018 and 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 JCS authorities to work in partnership and with Natural England to progress appropriate and strategic mitigation.
- 4.21 A further meeting between NE³³ and the JCS authorities in August 2018 suggested an interim approach to inform plan-making and assessments of planning applications. NE advised that in advance of data on visitor use being available (surveys scheduled for summer 2019), the JCS LPAs should take into account the visitor survey data gathered for the Perrybrook/North Brockworth development that indicates a zone of influence between 10-15

³¹ GCT JCS Proposals Map available at <http://maps.glosdistricts.org/map/Aurora.svc/run?script=%5cAurora%5cCBC+JCS+Allocations.AuroraScript%24&noache=533122006&resize=always>

³² Letter from NE to GCC (February 2017) responding to the GCP Regulation 18 consultation & HRA

³³ Letter from NE to GCC (August 2018) detailing interim approach to HRA & evidence gathering in relation to recreation pressure on European sites – Cotswold Beechwoods & Severn Estuary

km distance. The survey in respect of this strategic development also noted that the highest numbers of visitors travelled from postcode GL3 – the area in the GCP plan area that lies to the east of the city extending to the east and covering Innsworth, through Brockworth and into the Witcombes.

4.22 It is noted that the Initial HRA (November 2018)³⁴ of the Stroud Local Plan Review identified that - in lieu of pending survey work for Cotswold Beechwoods, a 5km zone is being used for potential recreational impacts. Since it is the potential in-combination effects of the GCP with the Stroud Local Plan that are of concern, it seems appropriate to align a comparable zone of influence for potential recreational impacts from the GCP. Therefore, this HRA initially considered those GCP site allocations that are within a 5 km radius³⁵ of the entrance to the Beechwoods SAC, identified as follows:

- SA01 Land at the Wheatridge – school & 10 dwellings
- SA02 Land at Barnwood Manor – 30 dwellings
- SA15 Land south of Winneycroft Allocation – 30 dwellings
- SA19 Jordan's Brook House – 20 dwellings

4.23 NE suggested that for planning applications for residential development involving a net increase in dwellings within the zone of influence will need to be subject to appropriate assessment. However, the City Council has taken a precautionary approach until the recreational surveys have been completed and the strategic mitigation plan further developed. The new Policy E8 Development affecting Cotswold Beechwoods Special Area of Conservation (SAC) sets out that development will not be permitted where it would be likely to lead directly or indirectly to an adverse effect upon the integrity of the SAC – alone or in-combination. The Policy requires that all development that leads to a net increase in dwellings will be required to identify any potential adverse effects and [provide appropriate mitigation – through the emerging SAC mitigation strategy or through a bespoke HRA. This provides strong mitigation measures.

4.24 The screening assessment concluded that there is some uncertainty with regard to the potential for likely significant effects in combination including plans/projects from neighbouring authorities at the **Severn Estuary SAC/SPA/Ramsar** through increased recreational disturbance arising from proposed new development. From the meeting between Natural England³⁶ and the JCS authorities in August 2018, NE suggested an interim approach to inform plan-making and assessments of planning applications with a similar approach to that described above for the Beechwoods.

4.25 NE advised that neighbouring authorities, Stroud DC and Forest of Dean DC, have undertaken visitor surveys and developed recreation mitigation strategies. The Severn Estuary Recreation Strategy³⁷ from Stroud DC

³⁴ <https://www.stroud.gov.uk/media/970711/final-stroud-local-plan-hra-16-11-18-emerging-strategy-consultation.pdf>

³⁵ Approximate measurements made using Defra Magic Map <https://magic.defra.gov.uk/MagicMap.aspx>

³⁶ Letter from NE to GCC (August 2018) detailing interim approach to HRA & evidence gathering in relation to recreation pressure on European sites – Cotswold Beechwoods & Severn Estuary

³⁷ <https://www.stroud.gov.uk/media/557874/item-8-appendix-a.pdf>

(December 2017) identifies the distance travelled from home by visitors as 7.7km thus defining a zone of influence for the Stroud area for use in HRAs. The initial HRA for the emerging GCP identified that the GCP area was some 8km distance from the designated estuary area. Thus, applying a similar zone of influence to that used by the neighbouring authority, it seems unlikely that the proposed development in the GCP area would lead to significant effects.

- 4.26 However, it is appreciated that new development may have effects on functionally linked land and NE advised in their response³⁸ to the GCP and initial HRA at Regulation 18 consultation that there is a growing awareness of the potential for recreational pressures to impact on the site, particularly on the bird populations for which the SPA/Ramsar are designated. These birds continue to use the estuary and river beyond the designation. The river is functionally linked to the designated site and the life and productivity of the SPA birds. It is the corridor that they use for migrations and to reach land such as Ashleworth Ham. Alney Island, immediately adjacent to the west of the GCP area, is thought to be a key wetland and stepping stone along the river. Therefore, recreational impacts on the river and supporting sites such as Alney Island have the potential for adverse effects on the European site.
- 4.27 The revised Policy E2 Biodiversity requires development to ensure that there will be no adverse effects on integrity of internationally designated sites – alone or in-combination. The supporting text provides more information and explanation to guide development with regard to the potential for recreational disturbance effects. Overall, this provides strong mitigation measures.
- 4.28 The screening assessment identified that increased disturbance at the **Walmore Common SPA** was unlikely due to the locations of the proposed site allocations some distance away and their local size. The site is about 4km outside the nearest boundary of the GCP area and some 8 km from the nearest GCP site allocations. It is noted that the HRA³⁹ of the Forest of Dean Site Allocations Plan (adopted June 2018) concluded that there would be no adverse effects on European Sites, and the initial HRA of the emerging Stroud Local Plan Review has screened out Walmore Common SPA due to its distance of at least 5 km from any proposed development. Therefore, taking into account the distance and size of proposed sites in the GCP and the conclusions of HRAs from the relevant neighbouring authorities, it is concluded that the GCP will not have adverse effects on the Walmore Common SPA, alone or in -combination.

Water Levels & Quality

- 4.29 The screening assessment identified that GCP site allocations SA09, SA11 & SA21 are located within the Water Framework Directive (WFD) Drinking Water

³⁸ Letter from NE to GCC (February 2017) responding to the GCP Regulation 18 consultation & HRA

³⁹ <https://www.fdean.gov.uk/media/5847/ap-habitats-regulations-sweetman-statement.pdf>

Protected Area (surfacewater)⁴⁰ indicating a risk of pollution and the need to protect water quality. These site allocations are close to the River Severn/Gloucester & Sharpness Canal that is functionally linked to the Severn Estuary SAC/SPA/Ramsar. GCT JCS Policy SD3 Sustainable Design & Construction requires development to use water efficiently and not cause harm to water quality. GCP Policy G7 Water efficiency promotes sustainable use of water; GCP Policy E6 Flooding, Sustainable Drainage & Watercourses promotes more sustainable management of water, which will positively affect water quality and levels. The screening identified that GCP Policy E7: Development within and adjacent to the Gloucester Docks & Canal could have effects on the Severn Estuary SAC/SPA/Ramsar site. However, the Policy E7 will only support such renewable energy development provided there will be no adverse impacts on biodiversity – thus providing mitigation measures.

- 4.30 Therefore, there is integrated/embedded policy to provide mitigation to ensure that there will be no adverse effects on **the Severn Estuary SAC/SPA/Ramsar** designated site in respect of water levels or water quality – alone or in-combination. The HRAs of the neighbouring authorities may be noted: no adverse effects concluded by the HRA of the Forest of Dean Site Allocations Plan (2018); the initial HRA of the Stroud Local Plan Review has identified a 1 km zone for considering water related impacts at the next stage of assessment.
- 4.31 Potential effects on the **Walmore SPA** site were screened out for the GCP Site Allocations SA01-SA22 since there are no pathways for impacts on surfacewater runoff or water quality at the site. Whilst the River Severn is functionally linked to the wetlands of the SPA, it is unlikely that the proposed developments would have any significant effects due to their local size and distance from the site. There is also embedded mitigation in the GCP through Policies JCS SD3, GCP G7 and E6 (as described above).
- 4.32 **Severn Estuary & Walmore Common:** Proposed developments utilising the renewable energy potential of the river and canal (GCP Policy E7) are likely to lead to changes in water levels and quality. Potential effects depend upon the location, size and precise type of development. However, GCP Policy E2 should provide sufficient mitigation measures to ensure that there are no adverse effects on water levels and quality for these designated sites.

Habitat Loss & Fragmentation

- 4.33 The screening assessment concluded that none of the GCP Site Allocations SA01-SA22 will lead to direct or indirect loss or fragmentation of designated land for the five identified European sites. However, some of the allocations are near to the River Severn and the Alney Island LNR – that may be important functionally linked land. Therefore, there is some potential for loss or fragmentation of supporting habitat for the **Severn Estuary SAC/SPA/Ramsar**. The designated features are sensitive to the loss of supporting habitat – the

⁴⁰ <https://magic.defra.gov.uk/magicmap.aspx> [accessed March 2019]

River Severn is functionally linked to the Estuary and important for migratory birds. It is the corridor that they use for migrations and to reach functionally linked land, e.g. Ashleworth Ham. Alney Island, which lies immediately to the west of the Gloucester City Plan area, is thought to be a key wetland and stepping stone along the river⁴¹. Also, GCP Policy B4 on development within or adjacent to the Docks and Canal. However, the GCP Policy E2 Biodiversity should provide sufficient mitigation measures to ensure that there are no adverse effects on any supporting habitat for these designated sites. GCP Policy requires a HRA to be undertaken if there could be an impact on internationally designated sites and thus providing embedded mitigation.

- 4.34 As explained above, GCP Site Allocations GCP site allocations SA09, SA11 & SA21 are close to the functionally linked water and land; also, GCP Policy B4 on development within or adjacent to the Docks & Canal. However, JCS Policy SD3, SD9 Biodiversity, and GCP Policy E2 Biodiversity provide embedded mitigation measures to ensure that there will be no adverse effects on the integrity of the Severn Estuary designated site. GCP Policy B4 requires a HRA if development could have an impact on designated sites – providing policy/site-specific mitigation measures.

⁴¹ As advised by Natural England in representation comments to Regulation 18 consultation HRA Report (October 2016)

5.0 HRA SUMMARY, CONCLUSIONS & NEXT STEPS

Summary

- 5.1 This report outlines the methods used and the findings arising from the HRA for the Gloucester City Plan (GCP). The HRA has been undertaken in accordance with available guidance, good practice and taking into account the implications from the recent CJEU Judgment (April 2018) 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 (LSEs). It has been informed by the HRA of the GCT Joint Core Strategy (adopted December 2017), the initial HRA screening work for the GCP (October 2016), as well as advice received from Natural England, the nature conservation regulator.
- 5.2 The GCT JCS identifies that at least 14,359 new dwellings are required to meet the needs of the Gloucester City area over the plan period 2011- 2031. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS identified strategic allocations/urban extensions and the GCP allocates the remainder of the identified need as far as possible at this time.
- 5.3 The Gloucester City Plan Policies, including Site Allocations for housing, mixed use and employment, were screened for likely significant effects (LSEs) and it was identified that there was uncertainty of effects on designated sites, as follows:
- Cotswold Beechwoods SAC as a result of changes to air quality and increased recreational disturbance
 - Severn Estuary SAC/SPA/Ramsar as a result of changes to air quality, increased recreational disturbance, changes to water levels and quality, and loss or fragmentation of supporting habitat
 - Walmore Common SPA as a result of changes to air quality, increased recreational disturbance, and changes to water levels and quality
- 5.4 The appropriate assessment indicated that there was embedded policy within the GCT JCS and the GCP to ensure that there will be no adverse effects on the integrity of the Cotswold Beechwoods SAC in respect of changes to air quality; the Severn Estuary SAC/SPA/Ramsar in respect of changes to air quality, changes to water levels and quality, and loss or fragmentation of supporting habitat; and Walmore Common SPA in respect of changes to air quality, increased recreational disturbance, and changes to water levels and quality. This is also in consideration of the relatively small size of the local sites and their distances from designated sites.
- 5.5 Natural England had reported concern about increased recreational disturbance at the Cotswold Beechwoods SAC and for the functionally linked land and water associated with the Severn Estuary SAC/SPA/Ramsar. There

are no defined zones of influence with regard to such recreational use from GCP residents and possible zones were applied in this HRA based on those used for the emerging Stroud Local Plan Review – and thus compatible for when considering in-combination effects. However, the City Council has taken a precautionary approach and developed a new GCP Policy E8 Development affecting Cotswold Beechwoods SAC that requires that all development in the City that leads to a net increase in dwellings should identify any potential effects and provide appropriate mitigation. The City Council has also further developed Policy E2 Biodiversity that requires new development to demonstrate that there are no adverse effects – alone or in-combination – on the integrity of internationally designated sites. The supporting text to GCP E2 further explains and guides with regard to potential adverse effects on functionally linked land and water for the Severn Estuary SAC/PA/Ramsar.

Conclusion

- 5.6 Overall, it was concluded that the Gloucester City Plan will not have adverse effects, alone or in-combination, on the identified European Sites. The JCS authorities are committed to an early review of the JCS; the Stroud Local Plan Review is ongoing, and the four authorities will continue to liaise under Duty to Cooperate requirements as the Review Plans progress. They will further be informed by monitoring undertaken for the Local Plans and their accompanying Sustainability Appraisals and HRAs. The authorities continue to collaborate with each other in respect of recreational surveys/studies and developing further strategic mitigation measures for any increased recreational disturbance at the Cotswold Beechwoods SAC and the Severn Estuary SAC/SPA/Ramsar.

Consultation and Next Steps

- 5.7 These findings will be subject to further consultation comments and advice from the relevant regulator, Natural England. The findings of this plan level HRA do not obviate the need to undertake HRA for lower level implementation plans and projects where there is potential for significant effect on one or more European sites. The findings of this HRA should be used to inform any future assessment work. This HRA Report (and any comments made) will be submitted alongside the SA Report and other evidence to support the submission of the draft GCP to the Secretary of State for independent examination in due course.