

Strategic Environmental Assessment (SEA) for the Ashchurch Rural Neighbourhood Development Plan

Environmental Report

Ashchurch Rural Neighbourhood Plan Steering Group

April 2021

Quality information

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Non-Technical Summary (NTS)

Introduction

AECOM has been commissioned to lead on the Strategic Environmental Assessment (SEA) in support of the emerging Ashchurch Rural Neighbourhood Development Plan (ARNDP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the ARNDP is a legal requirement.¹

The ARNDP is being prepared in the context of the prepared in the context of The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) (2011- 2031), which is currently under review, and the emerging Tewkesbury Borough Local Plan (TBLP), which was submitted for examination in May 2020.

Once 'made' the ARNDP will have material weight when deciding on planning applications in the Plan area, alongside the development plan for Tewkesbury Borough.

This NTS accompanies the SEA Environmental Report for the ARNDP. It is published alongside the 'Submission' version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).

Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SEA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report and summarised within this NTS. However, firstly there is a need to set the scene further by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

¹ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The ARNDP was subject to formal screening in 2020.

What is the Plan seeking to achieve?

The ARNDP has the following vision:

“Ashchurch Rural Parish is likely to experience significant development over the next 10 years and beyond. This neighbourhood development plan seeks to ensure that this development enhances connectivity for the existing community and ensures that the appropriate level of necessary community facilities and services is provided. New development within Ashchurch Rural Parish will be sensitively designed to integrate within the existing environment. In rural areas, new development will reflect, preserve and enhance the existing rural character.”

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes, objectives, and assessment questions, which, taken together indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented below, and a full framework which includes assessment questions is provided within the main Environmental Report (see **Table 3.1**).

Table NTS.1: Summary SEA framework

SEA theme	SEA objective
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features where possible.
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape and villagescape
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area
Land, soil and water resources	Ensure the efficient and effective use of land.
	Protect and enhance water quality and use and manage water resources in a sustainable manner.
Population and communities	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.
Transportation	Promote sustainable transport use and reduce the need to travel.

Plan-making/ SEA up to this point

The ARNDP sits within the strategic context of the emerging TBLP and JCS Review which are investigating the development potential of the wider area. Chapters 4 and 5 of the Environmental Report identify the strategic parameters which currently influence the level and location of growth within Ashchurch, and the ongoing work which will ultimately inform the outcomes in this respect.

In light of this strategic context, and as discussed in Chapter 5, no appropriate reasonable alternatives have been identified for further consideration through the SEA process.

Assessment findings at this stage

With regards to the potential effects of the Neighbourhood Plan, no significant deviations from the baseline are anticipated in relation to the SEA themes of biodiversity and land, soil and water resources. As a result, **broadly neutral effects** are concluded for these themes. This largely reflects the fact that the ARNDP does not propose further development over and above that which is already committed (with the Land at Fiddington having recently gained planning permission).

Minor positive effects are considered likely overall in relation to the remaining themes of climate change, landscape, historic environment, population and communities, health and wellbeing and transport. This reflects the additional policy provisions in the ARNDP which seek to; extend and enhance green infrastructure provision, protect the rural character of the plan area, increase accessibility, promote modal shift and support key rural transport infrastructure, increase road safety, and maximise the opportunities associated with the strategic growth anticipated through the emerging JCS Review (such as new infrastructure provision).

Furthermore, the ARNDP allows for ongoing investigation into the overall level and location of future growth in Ashchurch, while also providing a solid framework of policies which identify localised priorities in terms of transport, community facilities and design, and an evidenced localised vision for future development. In this respect the flexibility in the ARNDP in responding to the ongoing strategic scale work is considered for its potential to support **positive cumulative effects**.

Next steps

Part 3 of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by Tewkesbury Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the ARNDP will become part of the Development Plan for Tewkesbury Borough, covering the defined Neighbourhood Plan Area.

Monitoring

The SEA regulations require "*measures envisaged concerning monitoring*" to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of Neighbourhood Plans will be undertaken by Tewkesbury Borough Council, as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the ARNDP that would warrant more detailed monitoring over and above that already undertaken by Tewkesbury Borough Council.

1. Introduction

- 1.1 AECOM has been commissioned through the Locality technical support programme to lead on Strategic Environmental Assessment (SEA) in support of the emerging Ashchurch Rural Neighbourhood Plan (ARNDP).
- 1.2 The ARNDP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. It is being prepared in the context of The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) (2011- 2031), which is currently under review, and the emerging Tewkesbury Borough Local Plan (TBLP), which was submitted for examination in May 2020.
- 1.3 The Plan area, which covers Ashchurch Rural Parish in Gloucestershire, is identified in **Figure 1.1** below. Once 'made' the ARNDP will have material weight when deciding on planning applications in the parish, alongside the development plan for Tewkesbury Borough.

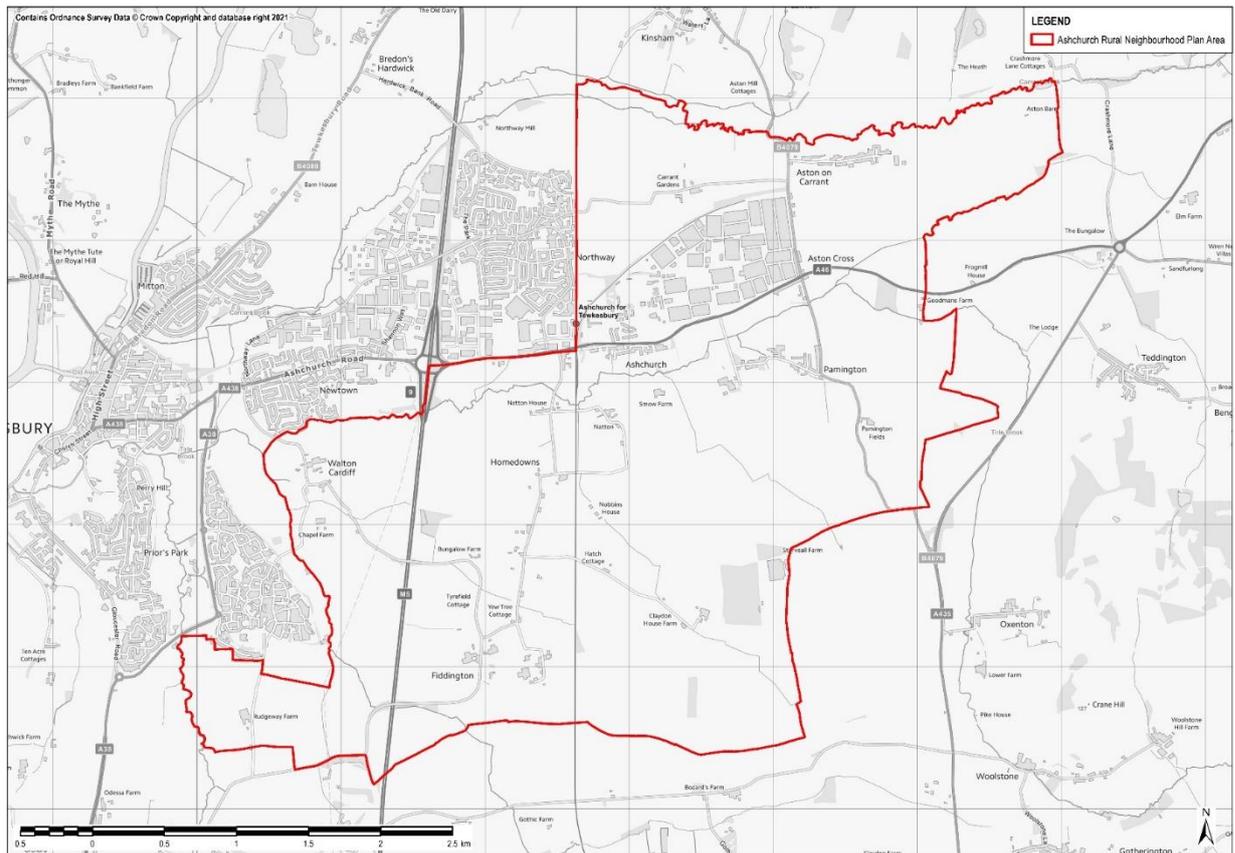


Figure 1.1: ARNDP area

SEA explained

- 1.4 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the ARNDP is a legal requirement.²
- 1.5 It is a requirement that SEA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.6 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the ARNDP that “identifies, describes and evaluates” the likely significant effects of implementing “the plan, and reasonable alternatives”.³ The report must be taken into account, alongside consultation responses, when finalising the plan.
- 1.7 More specifically, the Report must answer the following three questions:
 - What has plan-making/ SEA involved **up to this point**?
 - Including in relation to ‘reasonable alternatives’.
 - What are the SEA findings **at this stage**?
 - i.e. in relation to the draft plan
 - What happens **next**?

This Environmental Report

- 1.8 This report is the Environmental Report for the ARNDP. It is published for consultation alongside the ‘Submission’ version of the Plan, under Regulation 16 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.9 This report essentially answers questions 1, 2 and 3 in turn, to provide the required information.⁴ Each question is answered within a discrete ‘part’ of the report.
- 1.10 However, before answering Q1, two initial questions are answered to further set the scene; what is the ARNDP seeking to achieve? And what is the scope of the SEA?

² Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a ‘screening’ process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations (‘the SEA Regulations’). The ARNDP was subject to formal screening in 2020.

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ See Appendix A for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2. What is the ARNDP seeking to achieve?

Introduction

2.1 This section considers the strategic planning policy context provided by the existing development plan before then presenting the ARNDP vision and objectives.

Strategic planning policy context

2.2 The current development plan for Tewkesbury Borough comprises the following core documents:

- Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (adopted December 2017), currently undergoing review;
- Saved policies of the Tewkesbury Borough Local Plan to 2011, which are soon to be replaced by the emerging Tewkesbury Borough Local Plan;
- Minerals Local Plan for Gloucestershire (2018-2032); and
- Gloucestershire Waste Core Strategy 2027 (adopted November 2012).

2.3 The ARNDP is being prepared to be in general conformity with the strategic policies of the above documents as well as the strategic directions of emerging plans.

Gloucester, Cheltenham and Tewkesbury JCS

2.4 In terms of housing numbers, the following housing targets are specified in the Joint Core Strategy (JCS):

- Total housing target = 35,175, of which 9,899 to be delivered in Tewkesbury District.
- Total employment target = 112ha, of which 14ha to be delivered at a single strategic allocation in Ashchurch (as per Policy A5).

2.5 It is recognised in the adopted JCS that anticipated shortfalls in housing supply in the latter stages of the Plan period require an immediate review. The review of the JCS is currently underway, with an 'Issues and Options' consultation held in October 2018.⁵ Preferred Options consultation on the JCS review is anticipated to be undertaken in Summer/Autumn 2021.

2.6 The JCS Review is expected to explore land opportunities which help meet housing requirements in Ashchurch and Northway parishes.

⁵ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (October 2018) Joint Core Strategy Review Issues and Options Consultation (Regulation 18)

Emerging Tewkesbury Borough Local Plan (TBLP)

- 2.7 The TBLP was submitted to the Secretary of State for Ministry of Housing, Communities and Local Government on 18 May 2020 for examination. The consultation on the Pre-Submission plan previously took place between October and March 2019.
- 2.8 In this respect, the latest version of the Local Plan sets out a residual housing target for Tewkesbury of 2,455 dwellings. However, it is noted that the TBLP: *“does not identify any allocations in the Ashchurch area”* so as not to prejudice the outcome of emerging masterplanning and Garden Town work currently being undertaken in the parish to inform the JCS Review.

ARNDP vision and objectives

- 2.9 The following vision has been established for the ARNDP:

“Ashchurch Rural Parish is likely to experience significant development over the next 10 years and beyond. This neighbourhood development plan seeks to ensure that this development enhances connectivity for the existing community and ensures that the appropriate level of necessary community facilities and services is provided. New development within Ashchurch Rural Parish will be sensitively designed to integrate within the existing environment. In rural areas, new development will reflect, preserve and enhance the existing rural character.”

- 2.10 The eleven objectives underpinning this vision are set out below:

- Accommodating the scale of growth needed to deliver strategic housing and employment objectives for Tewkesbury, Gloucester and Cheltenham whilst retaining and enhancing the character and identity of the villages and hamlets within the Parish.
- Ensuring that the transport packages put in place manage and deal with traffic growth, to prevent further severe impact of an already busy corridor, including, protection of quiet routes. Rat running through Ashchurch settlements will be managed.
- Ensuring that all development makes provision for climate change. This is particularly important in terms of greenhouse gas emissions and water management and flooding. The use of Sustainable Urban Drainage systems working in concert with Green Infrastructure provision and Biodiversity enhancement will be promoted.
- Providing good quality sustainable transport links between the parish and surrounding major destinations. This must include enhanced passenger waiting facilities information, and service destination improvements particularly for bus and train.
- Protecting and enhancing the environmental assets and landscape value of the area.
- Preserving and enhancing green assets and public rights of way and other linkages within the open countryside.
- Ensuring that the proposed growth benefits existing local residents, in terms of facilities and services on offer, including access to sport, green

space, retail, café's and pubs, and health services associated with major development along the A46.

- Design for all new development should be of high quality, sustainable and that a well-designed public realm is provided as an integral part of schemes.
- Enabling local businesses to develop and grow.
- Improving broadband speeds for home workers.
- Provision of bungalows for the elderly.

3. What is the scope of the SEA?

Introduction

3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the key issues, sustainability themes and objectives that should be a focus of the assessment of the plan. The baseline information and policy review that has informed the identification of key issues and SEA objectives is presented in **Appendix B**.

Consultation

3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁶ As such, these authorities were consulted in February 2021. The responses received are detailed in Appendix B.

Key issues

3.3 The key issues identified for each SEA theme are detailed below:

Biodiversity

- The Plan area lies within the hydrological catchment of the Severn Estuary internationally designated site (SAC/SPA/Ramsar) and includes functionally linked habitat necessary for some of the migratory fish elements to complete their lifecycles; notably the European eel which is suffering a catastrophic decline. The Tirlle brook drains into the Swilgate which has an unobstructed confluence with the Severn increasing its significance and connectivity for fish. Development in the vicinity of the Tirlle Brook will need to consider its potential to harm the integrity of internationally designated species and habitats as well as opportunities to restore favourable status at sites.
- There are national sites (SSSIs) within 5km of the Plan boundary. National species and their habitats associated with these designated sites require protection from the effects of future development. Development should also support restoration and enhancement opportunities where they exist.
- There are a number of habitats identified within the Plan area, including woodland priority habitat network areas dispersed across Ashchurch. Insensitive development may disrupt native species that reside within these habitats, e.g. through habitat loss, and lead to indirect impacts such as disturbance.
- A handful of areas fall within ‘Network Enhancement Zone 1’ of the habitat network. Future development in the Plan area has the potential to add value to Network Enhancement Zones by acknowledging habitat sensitivity

⁶ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

and facilitating enhancements to habitats and ecological networks in these areas.

Climate change

- Tewkesbury Borough has had higher per capita emissions in comparison to the South West and England as a whole since 2005. Furthermore, Tewkesbury Borough Council declared a climate emergency in August 2019. Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the parish.
- The areas of highest fluvial flood risk (Flood Zone 3) and surface water flood risk in the Neighbourhood Plan area are those adjacent to the two brooks in the north and centre of the Parish. Development should be diverted from areas of highest flood risk where possible.
- There is relatively low access to EV charging points within the Plan area, only accessible in Tewkesbury. It should be acknowledged that development brought forward through the masterplan will seek to enhance EV connectivity wherever possible, which the Neighbourhood Plan could utilize to improve sustainable transport links within the area and reduce local emissions.

Historic environment

- There are 22 listed buildings in the Plan area, including four Grade II* listed buildings. Listed buildings are protected under Historic England and require safeguarding throughout the planning process to ensure their historic and architectural value is retained for future generations.
- There is one scheduled monument within the Plan area: the deserted medieval village, which provides important information on the diversity of medieval settlement patterns and farming economy between the regions and through time. Sensitive design, massing and layout during the development process is required to mitigate against the loss of historic and cultural value through the physical manifestation of the village and its representations.
- A number of non-designated assets are known for their local historical significance. Acknowledgement of the wider local heritage assets in Ashchurch should be required prior to the planning process to produce development that is sensitive to the historic importance of these entities, particularly given the scale of development expected to come through the ACM.

Landscape

- The Neighbourhood Plan area falls within the 'Severn and Avon Vales' NCA and the 'Settled Unwooded Vale' LCA. Future development should seek to acknowledge key sensitivities associated with the Settled Unwooded Vale LCA and Severn and Avon Vales NCA, and retain its' key features wherever possible.
- The 2017 Landscape Sensitivity Study identified a number of areas that are 'medium to high' sensitivity, adjacent to the Tewkesbury town centre. In

particular, the Draft Plan notes that recent development has caused concerns to be raised by the local community to the Parish Council about new urban influences upon the traditional rural character. Areas of high landscape sensitivity which demonstrate a resistance to future development should be preserved wherever possible.

Land, soil and water resources

- The Tirle and Carant brooks are the main watercourses which run through the centre of the Plan area. The Tirle brook has low ecological quality and both brooks have poor chemical status due to pollution from rural areas, pollution from wastewater and physical modifications. There is a need for future development to recognise and address the poor quality of waterbodies within the Plan area.
- The Plan area sits within a number of MCAs and MRAs (for sand and gravel), which are sensitive to pressures from future development. Safeguarding within these areas should be recognised during the plan-making process.
- The majority of the Plan area is underlain by Grade 3 'best and most versatile quality' agricultural land. Wherever possible, development should seek to prioritise previously developed land to avoid the loss of the 'best and most versatile' agricultural land.

Population and communities

- The population of Ashchurch increased by 21.8% between the period of 2011 and 2019 (based on mid-year estimates). Population growth was greater in the Parish over the period of 2011- 2019 than comparative figures for Tewkesbury, the South West and England as a whole. There is a lack of availability to key services to meet the needs of the current population. Proposals should seek to improve access to key services within the Plan area, including those likely to be brought forward through the forthcoming Garden Town Scheme.

Health and wellbeing

- The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited is better than comparative figures for the borough-level and national trends. Planning could seek to improve activity within the Plan area through the maintenance and provision of local green spaces and sustainable transport routes, as mentioned in Chapters 1 and 10.
- Health in the Plan area is predominantly good, and comparatively better than figures for the borough, region and country as a whole. Development should seek to maintain access to key health services within and beyond the Plan area to maintain good health for future residents.
- The Gloucestershire JSNA highlights a number of issues in the borough, including the prevalence of physical conditions related to smoking and obesity, and poor mental health. Development within the Plan area should seek to acknowledge wider issues within the borough.

Transport

- The Gloucestershire Highway Traffic Modelling Study indicated the assumed scale of development could have a significant impact on the highway network. The importance of this issue is also supported by the findings of the supportive highways impact assessment of the (Tewkesbury Area Draft Concept Masterplan) TADCM. Additionally, the TADCM notes a number of key road network issues, including congestion on a number of main roads during peak hours, and significant safety concerns. As indicated in the TADCM, in order to accommodate very substantial growth in the Ashchurch area, major development delivery road infrastructure and comprehensive sustainable living interventions will need to be brought forward through the development process. Development which is planned and arranged to be fully complementary to the achievement of maximising sustainable movement and greatly reducing the need to travel beyond the Ashchurch and Tewkesbury area will lessen the strain on the local and wider transport network. Potential approaches for ‘transforming the Sustainable Movement Environment’ are detailed in the TADCM and will likely be brought forward through this scheme.
- Bus services within the Plan area are limited with coverage focussed on Tewkesbury town centre to the west with limited coverage to the east. Services are not used consistently throughout Tewkesbury due to variable and sparse services. Improvements brought through the TADCM will include increasing access to key bus services as an alternative to private car use as a primary mode of travel.
- Though car and van ownership in the Plan area is comparatively higher than borough-level, regional and national statistics, there is also a comparatively higher proportion of the population who choose to travel to work via cycling or by foot. However, the key severance axes of the M5, A46 and railway line create a challenge for walkers and cyclists to reach employment areas and key services. A key focus of the development brought forward through the masterplan will be to actively promote and encourage walking and cycling, such as through the provision of dedicated and high-quality crossings would contribute greatly to walking and cycling movement across the area. As such sustainable transport links in the Neighbourhood Plan area are likely to improve as a result.

SEA Framework

- 3.4 The SEA scope is summarised in a list of themes, objectives and assessment questions, known as the SEA framework. **Table 3.1** presents the SEA framework as broadly agreed in 2021.

Table 3.1: SEA framework

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Biodiversity	Protect and enhance all biodiversity.	<ul style="list-style-type: none"> • Support and enhance the status of the nationally and locally designated sites within and within proximity to the Neighbourhood Plan area? • Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity? • Protect and enhance habitats and ecological networks in Network Enhancement Zones?
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<ul style="list-style-type: none"> • Reduce the number of journeys made and the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Improve access to EV charging points within and beyond the Plan area?
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Landscape	Protect and enhance the character and quality of landscapes and villagescapes.	<ul style="list-style-type: none"> • Preserve and enhance the unique features of the Settled Unwooded Vale LCA and Severn and Avon Wales NCA? • Avoid development in areas of low landscape capacity? • Conserve and enhance locally important landscape and villagescape features within the Neighbourhood Plan area? • Conserve and enhance local diversity and character? • Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
Historic environment	Protect, conserve and enhance heritage assets within the Neighbourhood Plan area.	<ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts? • Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the Gloucestershire HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic landscapes?
Land, soil and water resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 3a agricultural land? • Protect the integrity of mineral safeguarding areas?
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<ul style="list-style-type: none"> • Reduce the amount of waste produced? • Support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?
	Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Support improvements to water quality and the quality of rivers? • Minimise water consumption? • Support improvements to water quality within the River Swilgate NVZ?
Population and communities	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Maintain or enhance the quality of life of existing local residents? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?
	Reduce deprivation and promote a more inclusive and self-contained community.	
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs?

SEA theme	SEA objective	Assessment questions (will the proposal help to...)
		<ul style="list-style-type: none"> Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.	<ul style="list-style-type: none"> Seek to enhance resident accessibility to health services, particularly for the elderly and those with limiting health conditions? Promote accessibility to a range of leisure, health and community facilities? Provide and enhance the provision of community access to open green spaces? Promote the use of healthier modes of travel, including active travel networks? Improve access to the countryside for recreational use? Avoiding any negative impacts to the quality and extent of existing green infrastructure and recreational assets, including as formal or informal footpaths? Enhance natural assets and the PROW network?
Transport	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> Improve connectivity in the Plan area, including associated with enhancements to sustainable transport networks linked to the development of the Garden Community? Encourage modal shift to more sustainable forms of travel such as walking and cycling? Facilitate working from home and remote working? Improve road safety? Reduce the impact on residents from the road network?

Part 1: What has plan-making / SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 A key element of an SEA process is the appraisal of 'reasonable alternatives'. The SEA Regulations⁷ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should, if appropriate, present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
account the objectives and geographical scope of the plan'.
- 4.2 The aim of this part of the report is to explain work undertaken to identify reasonable alternatives for the SEA. More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to a particular issue that is of central importance to the plan, namely the allocation of land for housing.
- 4.3 The assessment of reasonable alternatives focuses on the matter of allocating land for development on the basis that housing growth is known to be a matter of key interest amongst residents and other stakeholders, and that it is also the issue that is most likely to result in a significant effect. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.
- 4.4 As in many cases for neighbourhood plans, the ARNDP Steering Group are limited in terms of potential alternatives that can be considered for the ARNDP, which must be in general conformity with and support the strategic development needs set out in the adopted and emerging Local Plan and JCS.
- 4.5 **Chapter 5** seeks to explain the strategic context in terms of site allocations, and how no appropriate reasonable alternatives have been identified in light of ongoing strategic-scale work relating to both the overall level and location of growth in the ARNDP area.

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

5. Considering reasonable alternatives

Introduction

- 5.1 The ARNDP sits within the strategic context of the emerging TBLP and JCS Review which are investigating the development potential of the borough, including at Ashchurch. This section identifies the strategic parameters which currently influence the level and location of growth within Ashchurch, and the ongoing work which will ultimately inform the outcomes in this respect.
- 5.2 In light of the strategic context, no appropriate reasonable alternatives are identified at this stage, as demonstrated through the discussion below.

The level of growth

- 5.3 In terms of the adopted development framework, the JCS provides the strategic directions in relation to housing supply. The adopted JCS identifies a number of considerations for development in Ashchurch:
- Tewkesbury Borough will facilitate additional growth to deliver unmet needs arising in Gloucester and Cheltenham;
 - Ashchurch Rural Parish forms part of the rural area (the remaining area outside of the identified settlement hierarchy). Whilst no housing allocation sites or housing growth figure is identified in the Ashchurch Rural Parish area, development in rural areas is expected to protect and enhance rural character, whilst increasing accessibility and improving self-sufficiency;
 - The role of Ashchurch for Tewkesbury railway station will be enhanced to provide good quality services and facilities to serve the area;
 - Policy A5 (Ashchurch) identifies a strategic employment allocation adjacent to the M5 and south of the A46 to deliver 14ha of employment land, 5ha of green infrastructure (to include a green corridor along the route of the Tirl Brook and a woodland belt at the southern boundary), and enhanced public transport, pedestrian and cycle connectivity.
 - The JCS does not identify land to meet the full needs of the borough over the plan period due to significant constraints in land availability. Whilst needs will be met in the short to medium term, there is a clear understanding that an early review of the JCS is required to order to address housing land shortfalls in the long-term (the latter part of the Plan period). In Tewkesbury this equates to a shortfall of around 2,450 dwellings; and
 - The JCS Review was expected to explore potential land opportunities arising at the MoD Ashchurch site (which has now been withdrawn) and a site at Fiddington (within the Ashchurch Rural Parish area) for their potential to deliver against the unmet housing need.
- 5.4 The JCS Review 'Issues and Options' consultation in 2018 identified that Tewkesbury Borough Council was successful in securing funding from Homes England (Garden Town status) to support the delivery of growth in the area both within and beyond the current JCS plan period. This work continues to explore the potential of the MoD land as well as other sites in the wider Ashchurch area.

- 5.5 The JCS Review is likely to extend the Plan period and plan for the additional housing needs arising over this extended period. This is also considered alongside the new national Standard Method for calculating housing needs and other growth considerations such as the need for affordable homes. As a result, current assessments indicate a slightly higher annual housing need than previously planned for, in the region of 1,780 homes a year as opposed to the 1,760 homes a year planned for in the adopted JCS.
- 5.6 The Tewkesbury Borough Plan (Pre-Submission version 2019) identifies that the Borough Council have commissioned masterplanning work for the Ashchurch area to inform the JCS Review and identify sites for further housing and employment growth. Furthermore, the Garden Town status awarded to the Ashchurch area is specifically aimed at helping Tewkesbury Borough Council deliver up to 10,195 houses for Tewkesbury at Ashchurch over the period to 2041.
- 5.7 The overall level of growth to be delivered in Ashchurch is still to be set through the JCS Review and will be informed by the ongoing investigation into the potential Ashchurch locations for growth. The 'Pre-Submission' version of the Tewkesbury Borough Plan does not identify any allocation in the Ashchurch area so as to not prejudice the outcome of both the masterplanning and Garden Town work. Advice from TBC recognises the complexity of the current position in terms of planning for overall housing numbers in the area and concludes that the ARNDP should not include a specific housing growth figure at this stage, given the uncertainties that exist during ongoing work.

The location of growth

- 5.8 The adopted JCS identifies that the JCS Review will explore potential land opportunities within Ashchurch arising at both the MoD site and at Fiddington.
- 5.9 The JCS Review 'Issues and Options' consultation in 2018 identified that the Ashchurch area is of particular strategic importance in helping to meet the outstanding housing and employment needs. In terms of location, it holds an advantageous position next to M5 Junction 9 with direct motorway access, making it particularly attractive as an area of employment growth. Ashchurch for Tewkesbury railway station also provides significant opportunities for sustainable transport movements. Whilst the JCS Review continues to explore options in relation to growth, it is recognised that options for a new settlement will largely be influenced by an evolving 'Ashchurch Concept Masterplan'.
- 5.10 The masterplan identifies potential strategic employment growth at Fiddington as well as new residential areas north and south of the A46. An enhanced local centre would be focused around Ashchurch for Tewkesbury Station which would adjoin a new employment frontage along the A46. The masterplan seeks to enhance the functional relationship between Tewkesbury and Ashchurch, placing significant emphasis on the railway station, community infrastructure, cycle and pedestrian connections and green infrastructure connections, as well as a potential southern relief road for the A46. The masterplan provides an indicative phasing approach which would see 3,180 new homes and 46 hectares of employment land delivered in the period up to 2031, contributing to the longer-term (4 phase) plans to deliver in total around 8,010 new homes and 120 hectares of employment land. The masterplan identifies that there is still

much uncertainty regarding the MoD site, with current expectations for potential partial release in the medium to long-term.

- 5.11 With regards to the land at Fiddington, a planning application was submitted to TBC in 2017 for planning permission for up to 850 dwellings, a primary school, a local centre, and supporting infrastructure including open space, play areas, recreational facilities and landscaping. Subsequent to the non-determination of the application, an appeal was recovered for the Secretary of State's determination in 2018. Following a public local inquiry in 2019, the Inspector recommended that the appeal be allowed, and planning permission be granted. In January 2020, the Secretary of State upon agreeing with the Inspector has allowed the appeal and granted planning permission. This land is therefore set to contribute to the delivery of housing in the Ashchurch area over the plan period for the ARNDP.

Considering reasonable alternatives

- 5.12 In recognition of the lack of land supply in Tewkesbury Borough, and the potential community benefits and the determination of its suitability, availability and achievability through the planning application process, the ARNDP will seek to support development at the 'Land at Fiddington' site.
- 5.13 As previously noted, the 'Ashchurch Concept Masterplan' identifies that there is still much uncertainty regarding the MoD site, with current expectations for potential partial release in the medium to long-term. As a result, the suitability and deliverability of the site as an allocation is considered to remain strategic in nature and for the JCS Review to continue to investigate (and not appropriate for consideration through the NDP process).
- 5.14 Whilst additional individual allocation sites could be sought through the NDP, it is recognised that the strategic work being undertaken through the JCS should seek to deliver a coordinated approach to development that maximises the potential for community infrastructure improvements and enhanced transport links. Further piecemeal development proposed through the ARNDP would therefore serve to undermine this approach and the potential to unlock benefits for residents.
- 5.15 On this basis, no reasonable alternatives in terms of the level or location of growth in the ARNDP area are identified as appropriate for further consideration through the SEA of the ARNDP. However, it is recognised that strategic-scale alternatives will continue to be explored through the JCS Review and its supporting Sustainability Appraisal.

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

6. Introduction (to Part 2)

6.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'Submission' version of the ARNDP. This chapter presents:

- An appraisal of the current version of the ARNDP under the eight SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

ARNDP policies

6.2 The ARNDP puts forward twelve policies to guide development in the Neighbourhood Plan area. **Table 6.1** below groups the drafted policies under seven broad policy themes for ease of reference within the SEA.

Table 6.1: ARNDP policies

Policy reference and brief overview of policy subject area by theme

Housing Land Allocation	
Policy S1	Site Allocation at Fiddington
Roads, Traffic and Transport	
Policy T1	Modal Shift for Major Development Proposals
Policy T2	Walking and Cycling Infrastructure Standards
Policy T3	Road Safety for Walking and Cycling
Employment	
Policy E1	Employment and Traffic
Policy E2	Modification of Existing B2, B8, and E Class Development
Community Facilities and Services	
Policy C1	Community Infrastructure
Policy C2	Broadband
Rural Character and Recreation	
Policy V1	Protection of the Intrinsic Value of the Countryside
Water Management	
Policy W1	Water Management

Development south of the A46

Policy H1	Housing in Rural Areas
Policy H2	Design of Housing in the Countryside and Claydon, Fiddington, Pamington and Walton Cardiff

Methodology

- 6.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 6.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 6.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

7. Appraisal of the latest version of the ARNDP

7.1 The appraisal of the current version of the plan is presented below under eight SEA theme headings, reflecting the established SEA framework (see **Table 3.1**). **Chapter 8** subsequently presents the overall conclusions and recommendations for the ARNDP.

Biodiversity

7.2 The Neighbourhood Plan area is not constrained by internationally or nationally designated biodiversity sites, however the Walton Cardiff Ponds area is a locally designated wildlife site within the parish. The biodiversity value of the parish is characterised by agricultural areas interspersed with woodlands, traditional orchards and some grazing marsh. Lapwing, a priority species, is notably present.

7.3 Mitigation measures are set out through the ARNDP policy framework with the intention of safeguarding and enhancing the parish's local biodiversity resource and support wider connectivity. Notably Policy S1 (Land at Fiddington) requires that the *“open space, landscaping, play areas, and recreational facilities”* outlined within the planning application for the site is delivered to accompany new development. In this respect the commitment to delivering open space and landscaping is likely to ensure that strategic opportunities of the site allocation are capitalised upon. Though the biodiversity value of the site is not significant, this will likely contribute to extending and improving the parish's green infrastructure network and supporting ecological connectivity, with the potential for minor long-term positive effects.

7.4 The ARNDP sets out that the NDP review will consider *“green infrastructure corridors that serve to retain a high level of biodiversity”*. However, to maximise the potential for positive effects, the future ARNDP policy framework could further embed the principle for biodiversity 'net gain' across the Plan area. This could recognise the potential outlined in the emerging masterplan work for strengthened ecological corridors and green corridors in the area, particularly in connections such as the Tirl Brook and Carrant Brook. Capitalising upon these strategic opportunities will improve resilience to current and future pressures and could include wider natural capital benefits, such as flood protection, recreation and improved water and air quality; as identified through the NPPF (2019), and the Government's 25-year Environment Plan (2018).

7.5 In conclusion, no significant effects are considered likely in implementation of the ARNDP. Whilst minor positive effects are anticipated through improvements to green infrastructure expected at the Fiddington allocation site, it is recognised that these will still occur in the absence of the Plan. On this basis, minor positive effects broadly **neutral effects** are anticipated overall.

Climate change

7.6 The climate change SEA objectives have a dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and supporting

resilience to the potential effects of climate change, particularly flooding. After the national Climate Emergency declaration (May 2019), Tewkesbury Borough Council declared a local Climate Emergency (July 2019), and in 2020 produced a 10 year action plan to become carbon neutral by 2030.⁸ This is reflected by the ARNDP, which highlights that the greatest threats to Ashchurch Rural Parish arise from climate change and flooding, and recognises the opportunities strategic growth at Land at Fiddington presents in this regard. As such climate change (including adaptation) is identified as the priority for infrastructure delivery in the parish, followed by sustainable transport and green infrastructure. These issues are anticipated to be considered in detail through the ARNDP review.

- 7.7 In terms of climate change mitigation, Policies T1-T3, which focus on sustainable transport uptake, support the ARNDP's objective to provide good quality sustainable transport links. This will help limit the contribution of transport to greenhouse gas emissions. While this is discussed in greater detail under the 'Transport' SEA theme below, Policy T1 (Modal Shift for Major Development Proposals) is notably relevant here. It requires that *"Proposals for "major development" as defined in the NPPF will only be supported where they demonstrate measures to integrate the new community with existing communities, where applicable, within the parish by encouraging a shift from car-based travel to walking, cycling and public transport."* This will be further supported by Policy C2 (Broadband), which is anticipated to lead to positive effects through reducing the need to travel to work. In this respect the policy seeks to encourage and facilitate home working in the long term, expecting proposals for major development to *"provide high speed broadband infrastructure which offers the fastest internet connection possible and that could enable greater online access in the future."*
- 7.8 In terms of climate change adaptation, flood risk is a key concern for the parish, with areas of vulnerability to flood risk located in the north and centre of the parish. Specifically, the strategic site allocation, Land at Fiddington, includes significant areas at high risk of fluvial flooding around the Tirlle Brook. It is assumed that this will have been considered as part of the planning application and that vulnerable uses will be directed away from areas of high flood risk on site.
- 7.9 The ARNDP recognises that the level of vulnerability to flooding is a considerable development constraint that will impact upon future development proposals and evolving planning policy. Policy T1 (Modal Shift for Major Development Proposals) provides direct links to the identified transport development principles, which includes priorities for ensuring new roads, cycle routes and pathways are not adversely affected by surface water flooding. This is supported by Policy W1 (Water Management) which requires all applications for new development to demonstrate that all surface water discharges accord with the principles of the drainage hierarchy; avoiding discharge to public sewerage systems wherever possible. Alongside the provisions of the emerging Local Plan, the JCS and NPPF it is likely that significant effects will be avoided.
- 7.10 The ARNDP also recognises the role high quality green infrastructure networks can play in adapting to climate change. In this respect the policy for the 'Land

⁸ <https://www.tewkesbury.gov.uk/news/Council%20takes%20action%20after%20declaring%20a%20climate%20emergency>

at Fiddington' site (Policy S1) requires that “*open space, landscaping, play areas, recreational facilities*” accompanies new development.

- 7.11 Overall, given that the housing allocation site has already gained planning permission, it is considered unlikely that implementation of the ARNDP will lead to any significant departure from the baseline. However **minor positive effects** are anticipated overall linked to the ARNDP's encouragement of sustainable transport use, the provision of green infrastructure enhancements and increased resilience to the effects of climate change.

Landscape

- 7.12 Ashchurch Rural Parish lies east of Tewkesbury and contains seven small settlements connected by rural roads, public footpaths and cycle ways. Residents cherish the traditional rural character of the Plan area, and its good connections to nearby towns. Despite this, it is recognised that the current landscape has the potential to change significantly if a strategic development area is taken forward; this is likely to deliver a level of growth which will have a significant urbanising influence.
- 7.13 The Landscape Sensitivity Study (LSS) for Tewkesbury and Ashchurch also concluded that large-scale residential and economic development in Ashchurch Rural Parish could have landscape impacts. In this respect the Ashchurch Concept Masterplan is in development to consider these impacts and potential mitigation in greater detail. The Masterplan will be more fully considered in the review of the ARNDP.
- 7.14 The ARNDP allocates the Fiddington site that has recently gained planning permission. Whilst growth at the site will occur with or without the ARNDP, the ARNDP provides additional policy provisions that seek to shape development at the site as well as future development, and minimise its impact in landscape terms. Notably Policy V1 (Protection of the Intrinsic Value of the Countryside) states that “*Development proposals in rural parts of the Parish other than on sites allocated through the Development Plan, particularly south of the A46 and in other rural areas and outside the developed areas of existing settlements (Claydon, Fiddington, Pamington, Walton Cardiff) will provide evidence that the tranquillity and accessibility of the countryside by foot, cycle, horse or other non-motorised mode will be protected.*” Furthermore, Policy H1 (Housing in Rural Areas) requires that “*development and modifications to existing buildings must be appropriate in terms of scale and overall size and respect local character and density.*”
- 7.15 Green infrastructure will play a crucial role in minimising landscape impacts, and maximising opportunities for positive landscape enhancements. As discussed under the biodiversity theme, new open space, play areas, recreational facilities and landscaping expected at the Fiddington site are likely to deliver minor positive effects in this respect. Furthermore, strategic green corridors and riparian routes are being identified through the Ashchurch Concept Masterplan which seek to enhance connections both within and beyond Ashchurch.
- 7.16 Given that the ARNDP does not allocate development over and above that which has already gained planning permission, no significant effects are considered likely overall. New green infrastructure and the additional policy

provisions which seek to retain and enhance character are likely to support **minor long-term positive effects**. However, it is ultimately recognised that the future baseline will largely be influenced by the ongoing JCS Review, Ashchurch Concept Masterplan and Garden Town work, and these will be more fully considered in the review of the ARNDP.

Historic environment

- 7.17 The parish has a long history evidenced through both the distinct character of the listed buildings scattered throughout the parish and the pattern of historic developments. In terms of historic assets present, there are several listed buildings in the parish, four of which are Grade II* and two of which are on the National Heritage at Risk Register. There is a Scheduled Monument in Walton Cardiff which is the site of a former medieval village.
- 7.18 The ARNDP has a close recognition of the parish's historic environment resource. In this respect, where development comes forward in the rural settlements, Policy H2 (Design of housing in the countryside and Claydon, Fiddington, Pamington and Walton Cardiff) expects new development to *“take account of nearby architectural features, building materials, massing and boundary treatments and should conform with the neighbouring built character whilst avoiding urbanising features that are inappropriate within the countryside.”*
- 7.19 The allocated housing development site at Fiddington has gained planning permission. The planning application highlights that there are no significant features of historic environment interest within the designated site area but identifies connections with designated assets that surround the site. Despite this, no significant impacts are anticipated in development at the site.
- 7.20 However, the urbanising effects of development in relation to historic areas such as setting of the Church of St Nicholas will inevitably occur with or without the ARNDP. Evidence indicates potential below ground archaeological remains of local and regional importance at the site, for which a mitigation strategy is proposed to limit impacts.
- 7.21 Overall, the ARNDP is considered unlikely to significantly affect or deviate from the baseline. However **minor positive effects** are likely as a result of the degree of protection that Neighbourhood Plan policies provide to the historic environment in the rural settlements.

Land, soil and water resources

- 7.22 The ARNDP sets out detailed policy in support of the site 'Land at Fiddington'. Ultimately, the loss of a significant area of greenfield land through the allocation of Land at Fiddington will lead to long-term negative effects in relation to this SEA theme. It is however recognised that these effects will arise with or without the ARNDP given that planning permission was granted in 2020.
- 7.23 In terms of Best and Most Versatile (BMV) agricultural land, recent detailed classification has not been undertaken in the Neighbourhood Plan area. There is therefore a need to rely on the Provisional Agricultural Land Classification map (pre-1988) which shows most of the parish being underlain by Grade 3 agricultural land. The planning application for the 'Land at Fiddington'

demonstrates that the site is predominantly underlain by Grade 3b land, avoiding significant loss of BMV land.

- 7.24 Severn Trent, the Water Authority, has undertaken a Sewer Capacity modelling assessment at strategic site 'Land at Fiddington' to determine the impact on the existing network. This assessment returned a high risk in the downstream network and as a result infrastructure improvements are required. "*Supporting infrastructure*" is a requirement set out within Policy S1 (Land at Fiddington) and this is further detailed through Policy W1 (Water Management). Policy W1 requires that "*All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, so that discharge to the public sewerage systems is avoided, where possible.*"
- 7.25 Consideration is also given through the ARNDP to water efficiency, recognising that the implementation of water efficient technology can result in wider benefits both from a water consumption perspective and from a surface water management perspective. In line with Policy W1, "*new development must incorporate water efficient design, preferably meeting the optional water efficiency target contained within Building Regulations Part G.*"
- 7.26 Finally, it is noted that supporting biodiversity and facilitating enhancements to green infrastructure provision in the Neighbourhood Plan area will likely improve the quality of land and water resources. This will promote the ability of natural processes to support soil and water quality. Requirements set out through Policy S1 (Land at Fiddington) and outlined in the planning application are anticipated to lead to minor positive effects in this respect. Opportunities in this respect are also further supplemented by the wider ARNDP policy framework.
- 7.27 Given that the housing allocation site has already gained planning permission, it is considered unlikely that the implementation of the ARNDP will lead to any significant departure from the baseline; and broadly neutral effects are considered likely overall. Despite this, the additional support provided through the ARNDP for green infrastructure and improvements to the water environment are likely to lead to **minor positive effects**.

Population and communities

- 7.28 Ashchurch Rural Parish lies to the east of the town of Tewkesbury. The parish contains seven small settlements connected by rural roads, public footpaths and cycle ways. There is a strong sense of community across the Parish, particularly in each concentrated settlement. Facilities and services available to the residents of Ashchurch are limited within the parish boundaries, however, the area provides good connections with nearby towns, including quick access to Tewkesbury, Cheltenham and Gloucester. The nearby towns provide a good range of services and facilities and most residents travel out of the parish for employment, training, education, essential shopping and health services.
- 7.29 Facilities within Ashchurch settlement include a primary school and community hall as well as a 24-hour garage (with shop) and Starbucks café. Public consultation and local surveys indicate a desire of residents for additional services (i.e local shop and pub) in the parish. They also highlight different infrastructure requirements for the more rural parts of the parish compared with

more urban areas. Education for example is a priority for the more urban area, while green infrastructure is a priority for the rural areas.

- 7.30 In terms of planning for housing needs in the Ashchurch Rural Parish area it is ultimately recognised that the ARNDP is limited in terms of its approach to both the level and location of growth with ongoing strategic-scale work determining this (JCS Review, Garden Town work and Ashchurch Concept Masterplan). In this respect the Plan supports the committed development site at Fiddington which will provide for up to 850 new homes, and outlines principles for any further development in rural parts of the Parish (other than sites allocated through the JCS Review) in both Policies V1 (Protection of the intrinsic value of the countryside) and H1 (Housing in Rural Areas). In this respect, the ARNDP provides flexibility in light of the ongoing strategic-scale work.
- 7.31 Policy C1 (Community Infrastructure) provides a direct policy link to the community aspirations laid out in Table 4 in the ARNDP (Community infrastructure development principles in Ashchurch Rural Parish). This includes a commitment to joint working to ensure the appropriate delivery of community infrastructure alongside strategic growth opportunities, including: adequate primary and secondary school provisions (for which there is currently limited capacity); library services; play space; broadband infrastructure; cemetery space and a growing community hub space (over and above that committed at the Fiddington site). This is supported by the provisions of Policies T1 – T3 which prioritise modal shift opportunities to support local walkable journeys and cycle connections and increase road safety for more vulnerable road users to maximise accessibility. The policies ultimately respond to local concerns around future growth increasing pressures on the A46 corridor (as a key connection route for residents) as well as a network of quiet lanes which characterise the area.
- 7.32 The delivery of new local community infrastructure that meets local needs is likely to lead to long term positive effects; facilitating modal shift and healthy lifestyles by reducing the short local trips which are currently made by car, and also allowing for elderly residents of the parish to maintain or even regain their independence. Furthermore, community infrastructure delivery will likely facilitate the development of an integrated community between new and old, as well as provide employment locally.
- 7.33 Ashchurch Rural Parish has a higher than average percentage of residents working from home. Recognising this, Policy C2 (Broadband) relates to the development of infrastructure that allows effective home working, recognising that home working could also be used as a method to increase economic activity in the area, particularly in light of the ongoing pandemic. In line with Policy C2 (Broadband) *“proposals for Major Development will be expected to provide high speed broadband infrastructure which offers the fastest internet connection possible and that could enable greater online access in the future.”* This is considered likely to lead to positive effects in the long term through supporting local economic growth and sustainable lifestyles.
- 7.34 Furthermore, the ARNDP supports the JCS’ recognition of the importance of the rural economy, with JCS Policy SD1 (vi) allowing employment in the wider countryside, within settlements, and adjacent to existing employment centres as well as employment-generating farm diversification projects. ARNDP Policy E2 (Modification of existing B2, B8 and E class development) supplements JCS

Policy SD1 to reflect the Parish's local context, requiring that *“extensions or modifications of existing Use Classes B2 (industrial), B8 (storage and distribution) and E (offices, research and development) must be of a scale, type and character commensurate with existing and surrounding development, particularly if located within an existing settlement or the countryside.”*

- 7.35 Overall, the ARNDP seeks to provide the necessary flexibility required in the context of the strategic-scale ongoing work to determine the overall level and location of growth in Ashchurch. Whilst responding to these uncertainties, the ARNDP highlights the local priorities for future growth, recognising the opportunities associated with strategic-scale development (such as new green infrastructure and increased educational capacity) and providing significant emphasis on increasing accessibility. As a result, **long-term positive effects** are considered likely overall.

Health and wellbeing

- 7.36 Access to services, facilities, green spaces, recreational areas and active travel opportunities as well as the wider countryside are important elements in planning for healthy lifestyles and improved health outcomes.
- 7.37 The ARNDP allocates the land at Fiddington which recently gained planning permission, and which is expected to provide new open space, play areas and recreational facilities as part of the development proposal. This is likely to improve accessibility to green infrastructure to some degree, particularly for residents in the south of the Plan area, addressing the priorities identified for rural areas in the south through consultation and survey work. Further strategic green infrastructure development is also anticipated in future growth as indicated by the emerging Ashchurch Concept Masterplan, particularly capitalising on opportunities that exist around the Tirl Brook and Carrant Brook.
- 7.38 Alongside this, the ARNDP provides significant emphasis on not only new infrastructure to support active travel opportunities but also retaining those areas of the Plan area which contribute to existing recreational routes. Policy T1 (Modal shift for major development proposals) provides a policy link to locally identified aspirations for appropriate pedestrian and cycle investment along the A46/ A438 corridor, supporting surface water drainage for new roads, limited increased use of minor roads and a protected network of quiet lanes, and safe and convenient access to the existing PRow network as well as new links between settlements. Furthermore, Policy T2 (Walking and cycling infrastructure standards) seeks to ensure high-quality infrastructure according to the standards set out in the Manual for Gloucestershire Streets and Policy T3 (Road safety for walking and cycling) seeks to increase safety for road users. The provisions are considered likely to lead to long-term positive effects by supporting residents with good accessibility and opportunities for active travel and access to the surrounding countryside.
- 7.39 Access to health services (medical and dental) are limited in the parish, and the ARNDP identifies that if the parish is to experience growth over the plan period, addressing the gap in these services will be a priority to ensure access for all residents. It is noted that the delivery of a doctors' surgery as part of new development will be a consideration through the ARNDP review.

7.40 Overall, strategic green infrastructure improvements are anticipated across the Plan area as a result of the higher-level work being undertaken for the JCS Review. The ARNDP provides additional support for improved health outcomes through a significant policy emphasis on prioritising access to active travel and recreational opportunities, and **long-term positive effects** are anticipated overall as a result.

Transport

7.41 The strategic road network is a key consideration for growth within the Neighbourhood Plan area; the M5 crosses the parish to the west, and the A46 crosses the parish to the north. The M5 and the A46 provide quick and easy access to employment and services in Tewkesbury, Cheltenham, Gloucester and more widely, to Bristol, Worcestershire and Birmingham. Car dependency in the Neighbourhood Plan area is subsequently high. Policy S1 of the ARNDP allocates Land at Fiddington which recently gained planning permission for up to 850 dwellings, a primary school, local centre, and supporting facilities. The main concerns held by residents relate to the potential increase in congestion, journey times, barriers to walking and cycling, rat-running on rural roads, and subsequently safety and community severance in the parish.

7.42 The Local Transport Plan (2015) recognises many of the transport issues raised by Ashchurch residents and notes that new development must have its transport impacts mitigated in order to avoid further decline. The LTP sets out short term and longer-term transport solutions to the north of the parish but little intervention is currently planned in the southern rural areas.

7.43 At the NDP level, the ARNDP policy framework seeks to address residents' concerns where possible, ensuring that the impacts of strategic development (notably increasing capacity along the A46) does not *"impact upon life in the Parish."* Policies T1 – T3 supplement JCS policy INF1, which requires new development to provide safe and accessible connections to the transport network. It also requires developers to consider the impact of proposals on the transport network in a Transport Assessment. Policies T1 – T3, including the transport development principles set out (Table 3 of the ARNDP), should be considered in any such assessment to ensure that the unique circumstances of Ashchurch Rural parish are fully addressed. Key priorities in this respect include ensuring that *"an area wide travel strategy for the A46 Growth Corridor is developed"* and *"the A46/A438 corridor is strategically managed and appropriate traffic management, pedestrian, cycling and public transport investment is prioritised to deal with existing and future traffic growth."*

7.44 Looking specifically at the allocated site, Policy S1 (Land at Fiddington) sets out that *"supporting infrastructure"* will be required alongside new development. Given development at the site would take place with or without the ARNDP, the wider policy framework seeks to ensure that transport packages are put in place to manage and deal with traffic growth, to prevent further severe impact of an already busy corridor, including through improving the sustainable transport offer and protecting quiet routes.

7.45 Policies T1-T3 are significant in this respect, with Policy T1 (Modal Shift for Major Development Proposals) stating that *"Proposals for "major development" as defined in the NPPF will only be supported where they demonstrate*

measures to integrate the new community with existing communities, where applicable, within the parish by encouraging a shift from car-based travel to walking, cycling and public transport.” Policy T1 also sets out an extensive list of requirements, notably ensuring the delivery of *“Infrastructure improvements to significantly increase use of sustainable modes of transport including walking, cycling, bus and rail between Ashchurch Rural Parish and Tewkesbury, Bishop’s Cleeve, Cheltenham, Gloucester, Evesham and the surrounding area.”* The desire for bus services to support new housing, and higher frequency rail was a key issue raised during both NDP consultation and consultation carried out to inform the Local Transport Plan (2015). Improved connections from rural communities to central hubs such as Cheltenham, Tewkesbury, Gloucester and Evesham are anticipated to help meet ARNDP objectives and lead to positive effects in the long term.

- 7.46 Policy T2 further seeks to ensure that public transport provision is *“convenient”* and *“direct”* in accordance with Department for Transport’s Infrastructure Design Guidance (2020).⁹ It is considered that the delivery of high quality, reliable sustainable transport infrastructure will improve accessibility and to encourage the move away from private car at an early stage.
- 7.47 Concerns have also been raised locally regarding ‘rat-running’ on local roads. The A46 specifically is difficult to use for pedestrians and cyclists, and there are issues with peak time travel congestion. Additionally, to the south of the A46 lies a network of small country roads (‘quieter routes’) which connect the smaller settlements and add to the rural tranquil character of the parish. It is considered that strategic scale development has the potential to impact upon smaller settlements and valued routes, which will be disruptive causing severance within and between communities. Policy T3 (Road Safety for Walking and Cycling) therefore seeks to ensure that *“existing road safety issues will not be exacerbated”*. Scheme proposers should *“provide a plan showing routes that will avoid rat-running along minor roads or through settlements”* and *“development should not, including during construction, cause harm or obstruction to the public rights of way network.”*
- 7.48 Further support for local roads is provided through Policy E1 (Employment and Traffic), which requires that *“B-class employment uses classified as major development should avoid adding traffic to minor “C” roads in the parish and should therefore be located with access to the A46 or other trunk roads.”*
- 7.49 Introducing safeguards for recreational and sustainable transport routes through the ARNDP policies is likely to mitigate any potential adverse effects; maintaining and enhancing the safety and attractiveness of the Public Rights of Way (PRoW) network. This will encourage healthy lifestyles and inclusivity; accommodating the cyclist, horse riders and pedestrians alike.
- 7.50 Overall, the ARNDP policy framework sets out the necessary requirements to enable strategic growth in the parish in a way that does not exacerbate existing issues; seeking to boost local connectivity and accessibility, and where possible support modal shift. Alongside facilitating increased levels of home working, the ARNDP provides significant support in reducing the impacts of congestion

⁹ <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

and out-commuting in the Parish as it grows. As a result, **long-term positive effects** are anticipated in implementation of the ARNDP.

Cumulative effects

- 7.51 In terms of **intra-plan effects** (the combined effects of different impacts arising within the plan itself) no significant or negative cumulative effects are considered likely. The ARNDP does not Plan for additional development over and above that which has already been committed, which significantly reduces the potential for intra-plan conflicts. However, **positive cumulative effects** could be anticipated through the support for green infrastructure and sustainable drainage development that holds multiple benefits in relation to the SEA themes of biodiversity, climate change, landscape, land, soil and water resources, population and communities and health and wellbeing.
- 7.52 In terms of **inter-plan effects** (effects in combination with other plans and projects), when considering the ARNDP in conjunction with the Ashchurch Concept Masterplan, the Garden Town work, and JCS Review **minor long-term positive cumulative effects** are anticipated. This is predominantly as the ARNDP seeks to provide the flexibility required to allow ongoing investigation into the overall level and location of future growth in Ashchurch, while also providing a solid framework of policies which identify local priorities in terms of transport, community facilities and design, and an evidenced localised vision for future development. In this respect, the ARNDP recognises the additional benefits of strategic masterplanning to maximise the potential for positive enhancements in the Plan area whilst providing evidence to support the ongoing strategic-scale work.
- 7.53 Furthermore, the additional ARNDP policy protections for water resources and water quality are likely to complement strategies relating to the wider water catchment area.

8. Conclusions and recommendations

Conclusions

- 8.1 No significant deviations from the baseline are anticipated in relation to the SEA themes of biodiversity and land, soil and water resources. As a result, **broadly neutral effects** are concluded for these themes. This largely reflects the fact that the ARNDP does not propose further development over and above that which is already committed (with the Land at Fiddington having recently gained planning permission).
- 8.2 **Minor positive effects** are considered likely overall in relation to the remaining themes of climate change, landscape, historic environment, population and communities, health and wellbeing and transport. This reflects the additional policy provisions in the ARNDP which seek to; extend and enhance green infrastructure provision, protect the rural character of the plan area, increase accessibility, promote modal shift and support key rural transport infrastructure, increase road safety, and maximise the opportunities associated with the strategic growth anticipated through the emerging JCS Review (such as new infrastructure provision).
- 8.3 Furthermore, the ARNDP allows for ongoing investigation into the overall level and location of future growth in Ashchurch, while also providing a solid framework of policies which identify localised priorities in terms of transport, community facilities and design, and an evidenced localised vision for future development. In this respect the flexibility in the ARNDP in responding to the ongoing strategic scale work is considered for its potential to support **positive cumulative effects**.

Part 3: What are the next steps?

9. Next steps

- 9.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

- 9.2 Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 9.3 If the examination leads to a favourable outcome, the Neighbourhood Plan will then be subject to a referendum, organised by Tewkesbury Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the ARNDP will become part of the Development Plan for Tewkesbury Borough, covering the defined Neighbourhood Plan Area.

Monitoring

- 9.4 The SEA regulations require "*measures envisaged concerning monitoring*" to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 9.5 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by Tewkesbury Borough Council, as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the ARNDP that would warrant more detailed monitoring over and above that already undertaken by Tewkesbury Borough Council.

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Appendices

Appendix A Regulatory requirements

As discussed in **Chapter 1** above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table AA.1** overleaf links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA.2** explains this interpretation. **Table AA.3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA.1: Questions answered by this Environmental Report, in line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the Environmental Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table AA.2: Questions answered by this Environmental Report, in-line with regulatory requirements

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

Table AA.3: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What is the plan seeking to achieve') presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix B presents key messages from the context review.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 5 provides an overview of the strategic context relating to the level and location of growth which presents outline reasons for why no reasonable alternatives can be established at this stage.
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.

Regulatory requirement**Discussion of how requirement is met**

10.A non-technical summary of the information provided under the above headings

The NTS is provided at the beginning of this Environmental Report.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this Environmental Report is published alongside the 'submission' version of the Ashchurch Rural Neighbourhood Development Plan, with a view to informing Regulation 16 consultation.

The SA must be taken into account, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed plan finalisation.

Appendix B Scoping information

This appendix presents the baseline information and policy review that has informed the identification of key issues and SEA objectives as presented in **Chapter 3** of the Environmental Report.

It was established at scoping that for the purposes of this SEA, the air quality theme has been scoped out of the proposed framework.

Scoping consultation was undertaken during the period Tuesday 9th February to Tuesday 16th March 2021. The responses received are identified in **Table AB.1** below.

Table AB.1 Scoping consultation responses

Scoping consultation response	SEA update/ response
Historic England	
David Stewart, Historic Places Advisor, South West	
<p>Thank you for your consultation on the SEA Scoping Report for the emerging Ashchurch Neighbourhood Plan.</p> <p>Our main interest in the Plan has been policy S1 which proposed allocating land for development at Fiddington. However, as a scheme for the site has been approved our observations in response to the Regulation 14 consultation last year just highlighted that as the principle and scale of development for the site had thereby been established our interest would only be rekindled as and when the Plan might promote development which was a departure from that approved and which had the potential to generate new impacts on the historic environment (see attached).</p> <p>As a consequence, when we were subsequently consulted by Tewkesbury Borough Council on the SEA Screening Report we indicated that there no heritage issues at that time which we thought might prompt the need for a full SEA but the Report indicated that one would be justified on transport and infrastructure loading grounds (see attached).</p> <p>On that basis there are only a couple of comments on the Scoping Report which we would offer:</p> <p>To reiterate the desirability and helpfulness, as indicated in responses to previous SEA Scoping consultations, of the Report setting out in its introduction section why it is felt that a full SEA is required.</p> <p>On a precautionary basis, we would recommend also including reference to our guidance on Site Allocations which, although titled with reference to Local Plans, has equal application to Neighbourhood Plans. This can be found at https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	<p>Comments noted with thanks. HE guidance on Site Allocations has been included as part of the historic environment policy review.</p>
Environment Agency	
Ruth Clare, Planning Specialist – Sustainable Places	
<p>FLOOD RISK</p> <p>The report includes the issue of Flood Risk wholly within the Climate Change chapter. The principles and policies of the SEA should at the very minimum adopt those of other applicable plans such as the Joint Core Strategy and Local Plan to provide</p>	<p>Many thanks for your comments, the policies of the Joint Core Strategy and Local Plan have been included as part of the policy context and review and will be</p>

Scoping consultation response

a level of consistency. If sufficient evidence is available then more specific local policies could be applied to compliment these that could also link into other policies within other chapters.

All potential forms of flooding as set out in paragraph 4.3 should be covered when assessing the potential impacts of climate change. The assessments should use the latest guidance published by DEFRA for both watercourse flows and rainfall intensities. Available at:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The limitations of the 'Flood Map for Planning (Rivers & Sea)' extract shown in Figure 4.1 should be caveated to prevent misunderstandings and cross referenced with Figure 4.2 which will replicate the extent of fluvial flooding on some of the smaller watercourses.

We have no further comments to add at this point in time (although please note we have made some additional flood risk comments in the Biodiversity section below). We may wish to comment further on flood risk matters associated with proposed developments as part of the ARNDP, but that would fall outside of the current scoping consultation.

BIODIVERSITY

We have the following comments on the content of the Scoping Report, in particular the evidence base for the SEA, the identified key issues and the proposed SEA Framework.

3. Biodiversity theme

Key messages from the policy context including National Planning Policy Framework¹³ (NPPF) and the Natural Environment White Paper (NEWP)¹⁴ include numerous references to enhancement and at least one to restoration. This needs to be more closely reflected in the baseline, future baseline, key sustainability issues, objectives and appraisal questions and assessment questions.

Current baseline

Sec 39. Internationally designated sites

The Neighbourhood Plan area is within the hydrological catchment of the Severn Estuary internationally designated site (SAC/SPA/Ramsar) and includes functionally linked habitat necessary for some of the migratory fish elements to complete their lifecycles notably the European eel which is suffering a catastrophic decline. The Tirlle brook drains into the Swilgate which has an unobstructed confluence with the Severn increasing its significance and connectivity for fish.

Nationally designated sites

The large number of, eleven, Nationally important sites listed in section 3.10 should inform and inspire suitable restoration objectives for other areas.

Locally designated sites

Is the list in 3.11 complete? We believe there are at least two other Key Wildlife sites in the ARNDP area or zone of influence. Walton Cardiff Ponds LWS situated in the south west part of the Plan area and associated with Tirlle brook has potential for enhancement for existing semi improved flood plain grassland, great crested newts and for containing traditional orchards.

We welcome reference to Tewkesbury Nature Reserve. The relevance of this site, identified as strategically important in the JCS GI strategy, to the ARNDP area is multi fold. Significant

SEA update/ response

considered as part of the overall development framework covering the Neighbourhood Plan area.

The SEA will subsequently seek to identify any opportunities to enhance local policy mitigation.

Climate change allowances will be utilised in the SEA and an appropriate caveat has been added to the updated baseline information provided in this appendix.

We welcome any further comments as the SEA progresses.

Noted with thanks, it is considered that the SEA does and will continue to provide significant emphasis on habitat restoration and enhancement opportunities.

It is noted that only one Local Wildlife Site can be identified through the identified source. This is looking at sites within or immediately adjacent to the Plan area.

The baseline, future baseline, key sustainability issues and objectives and appraisal questions have been updated to:

- Identify the ecological links to the Severn Estuary SAC/ SPA and Ramsar site;
- Identify the potential impacts at Tewkesbury Nature Reserve occurring from future growth in the Plan area;
- Provide greater clarity around identified species in the Plan area; and

The subsequent SEA will identify potential cumulative effects and opportunities that extend the Plan area.

Scoping consultation response

SEA update/ response

investment by the EA, other partners and the local community into river and floodplain restoration was undertaken with the express intention of demonstrating and trialling techniques and solutions that could be replicated elsewhere in the locality. The experience of managing the dual issues of wildlife and community have also developed experience that could be transferred into the GI upstream. The Tirlle catchment drains into the site so there is a mechanism for direct adverse hydrological impacts as well as increased visitor pressure

Habitats

The series of habitat network maps described in section 3.12 and presented as 'Network Enhancement Zones' on Magic Map software are a welcome development and very useful for inclusion in the ARNDP and associated SEA to help identify areas for future habitat creation and restoration at a landscape scale but are insufficient in themselves to inform a comprehensive locally appropriate approach. They are a guide for local consideration and to help stimulate local engagement with partners and to agree local priorities. Natural England (NE) suggest that the maps are used in conjunction with other datasets and with local knowledge to identify opportunities for action. Specifically they do not yet give adequate consideration to watercourses and associated habitats which need to be taken into full account with respect to local opportunities and constraints in this locality and identify where action might help build more ecologically resilient ecosystems across landscapes.

Natural England advise that 'these maps look specifically at habitat creation and restoration in the vicinity of existing habitat and are not designed to reflect the potential for naturally occurring ecosystems across landscapes, particularly in respect of natural hydrology'. In addition there is currently no network map for coastal & floodplain grazing marsh. NE's published guidance recognises that this habitat may be an important component of many catchments but have not yet prepared a habitat network map as the biodiversity quality varies and the current definition doesn't take into account expanding the semi-natural wetland habitats and accommodating natural function. Work is ongoing to investigate the potential to modify the habitat definition to take account of the needs for better natural functioning floodplains.

The Priority Habitat Inventory is the primary data source for the majority of the habitat network maps. This is not comprehensive or 100% accurate. The focus, energy and investment around the Garden Town and these plans should be directed to improvement of the PHI dataset with better local data and enable the use of the Habitat Network maps alongside local knowledge and data.

Other local datasets and knowledge include tools being developed by the Gloucestershire Wildlife Trust, the work of the Carrant Partnership and the EAs Wetland Vision.

Another invaluable tool is a comprehensive river restoration strategy. Some more detail on what that should entail was highlighted in the EAs comments dated 11 January 2019 (copy enclosed) on the Concept Masterplan for the Tewkesbury Area published in 2018 as part of the Joint Core Strategy (JCS) Review which we ask to be taken into account. More detail below.

Scoping consultation response

SEA update/ response

The habitats identified within the Plan area in 3.13 that have the potential to diversity of fauna susceptible to the effects of development should be expanded to include rivers and streams.

The list in section 3.14 of Species with the potential to be present in the Neighbourhood Plan area is incomplete and needs to be expanded to include a wider range of known and potentially occurring species including (but not limited to) the European eel, otter and Great Crested Newt. In addition there needs to be greater clarity on the source and limitations of any data cited for example GCER, NBN, local experts or commissioned surveys

Figure 3.1 Biodiversity assets in Ashchurch Rural Parish

Fuller report will need to use more sources than MAGIc

Key sustainability issues

- The issue focusing on internationally sites to be updated to include the Severn Estuary and reference is made to restoring favourable status of the sites and their designated features.
- The issue focusing on nationally important sites (SSSIs) is reworded to capture the importance of habitat restoration networks being inspired and informed by those habitats to and that where possible improved including where appropriate increased connectivity and scale and reduced fragmentation. This is particularly relevant to species rich floodplain meadows
- The issue focusing on habitats includes the need to enhance and extend degraded habitat networks. The term domestic species might better be substituted with native species. Insensitive development will do more than disrupt species that reside within these habitats, but can lead to local extinction.
- The issue focusing on 'Network Enhancement Zones' is updated to reflect the broader range of baseline information and strategies which would inform the nature and geography of habitat improvements.

SEA Objectives and appraisal questions for the Biodiversity theme

The assessment questions should be strengthened

- Support and enhance the status of the nationally and locally designated sites within and within proximity to the Neighbourhood Plan area?

- Omit 'Seek' but include protect and enhance habitats and ecological networks in Network Enhancement Zones?

The scale and nature of the proposed additional development as a whole and its impacts on existing and potential biodiversity, could give rise to significant effects. Mitigating the impacts alone will require substantial habitat improvement as compensation. Avoidance measures alone will not be adequate. Given the scale of the development, particularly in combination with the adjacent other plans and projects the assessment should also identify mitigation opportunities and ecological enhancements outside the Proposed Development. These will need to be significant if used to genuinely promote a net gain in biodiversity.

Scoping consultation response

Climate Change Theme

We welcome the acknowledgment of the climate crisis and the significant challenge of the development itself not to contributing to global temperature change. The need to create a carbon neutral community needs substantial and ambitious commitment with positive and explicit commitments and obligations.

References to flood risk appear to focus on risk to residents within the plan area and there isn't adequate consideration of downstream impacts.

The Green Infrastructure Pledge for Gloucestershire referred to in section 4.13 includes the need for consideration to be given to upstream and downstream solutions and services that nature provides; where environmental net gain is demonstrated through green infrastructure; and where this is brought about by numerous joined-up, local level initiatives across the county' in its 'green vision' for the County:

Holistically restoring and re-naturalising watercourses, associated land, floodplains and wetlands can increase space for water and wildlife to benefit Ashchurch parish but also downstream residents. A key issue or measure of success in protecting and enhancing ecology and biodiversity and increasing resilience to climate change is the scale and quality of measures. The Carbon sequestration role of habitats including wetlands is also worth drawing attention to.

This is in accordance with one of the measures highlighted in section 4.3 to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere

6. Landscape theme

We have made comments on the landscape theme below in as much as they relate to floodplains and watercourses. This is in the context of preserving and enhancing the local landscape features such as watercourses and the linked network of hedgerows and ditches. Retaining and respecting the existing natural topography within generous river corridors, which extend significantly beyond the functional floodplain; are wide enough to accommodate recreational use; whilst minimising impacts on existing and improved biodiversity will contribute to a strong character of place

The provision of an aesthetic recreational value within new development includes good design quality of SuDS features which will need to go beyond the functionality and generic nature of SuDS seen in many large scale housing developments. An exemplar sustainable urban drainage system should be designed, located, constructed and managed in such a way as to positively contribute to the nature conservation value and amenity of the site and to ensure the ecological quality of the receiving watercourses is maintained or improved.

Features such as attenuation basins/infiltration basins are designed to blend into and enhance the existing landscape rather than being just utilitarian or uniform. Design options and approaches to allow for naturalistic side slopes with a varied gradient slacker than 1:3, diversity in ledge height and width and a permanent water depth of greater than 0.15m. Inlet and outlet structures are safe but avoid the use of intrusive headwalls,

SEA update/ response

Noted, with thanks. The updated scoping information provided in this appendix places greater emphasis on the potential for downstream impacts and improvements outside of the Plan area, as well as the carbon sequestration role of habitats.

Noted, with thanks.

Scoping consultation response

SEA update/ response

concrete structures and grills. The type and configuration of suds features, including conveyance features such as swales is informed by and doesn't compromise the local biodiversity and landscape context and the constraints and opportunities that presents.

Ensure there are sufficient stages in the SUDs management train such that the water quality is adequate to support amenity and conservation value of any attenuation pond features. In other words avoid positive drainage and underground attenuation tanks and utilise minimisation and source controls before "downstream" attenuation / treatment systems are considered. The use of soakaways and swales should not be dismissed prematurely, on the grounds that the soil is unsuitable for infiltration. Low-tech, decentralised primary treatment for example distributed storage and treatment at source, can reduce the size of downstream conveyance. It also improves the amenity and conservation value of attenuation pond features which if full of untreated, silty and polluted runoff can be unsightly.

7. Land, soil and water resources

Noted, with thanks.

We welcome reference to the Water Framework Directive (WFD) and the need to enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems. It is worth noting that WFD waterbodies include the catchments. In other words, measures and interventions on tributaries and in the drainage basin are relevant not just in the course of the main river.

Future Baseline

Noted, with thanks.

We agree that the ecological and chemical water quality of watercourses in the Plan area is sensitive to poorly planned development, including inappropriate waste disposal and sewage systems.

Key Sustainability Issues

Noted, with thanks, the key sustainability issues have been updated.

The wording should be changed to substitute that there is a need for future development not merely to recognise but address the poor quality of waterbodies within the Plan area.

SEA objectives and appraisal questions for the Land, soil and water resources SEA theme

Noted, with thanks.

We welcome the objectives to use and manage water resources in a sustainable manner and minimise water consumption but the objective to support improvements to water quality should be reworded to reflect the need for improvements in a wider range of aspects of river quality including physical modifications. 'Ecological quality of waterbodies' might better align with the Water Framework Directive.

The assessment questions have been updated to reflect the comments made.

Should Support enhancements to water quality within the River Swilgate Nitrate Vulnerable Zone (NVZ) be more appropriately Improvements?

Land take requirements and the need for a river restoration strategy and flood modelling ahead of development will be considered in the subsequent assessment of options and proposals for the ARNDP.

It is important that a river restoration strategy is devised ahead of development which identifies opportunities such as culverted tributaries and makes reference to historic maps and stretches where natural characteristic have been less modified. In relatively recent living memory these watercourses were significantly shallower and gravelly. Historical accounts of the

The SEA will consider the identified mitigation measures/ opportunities through the assessment of the allocation site,

Scoping consultation response

Carrant described marshy edges and hollows with ragged robin and other not uncommon but significantly decreasing flora.

In order to alleviate on-site and downstream flooding this will require greater land take than illustrated on the draft masterplan for the Garden town.

Flood modelling needs to take into account the adoption of a wide range of measures which may influence developable area within the new development itself and will certainly make some areas wetter for at least some or all of the year.

There are a number of examples of feasible and appropriate river restoration measures that have already been successfully trialled on small parts of the Carrant and Squitter brooks, within and upstream of the ARNDP area, and on the Swilgate downstream, including within Tewkesbury Nature Reserve. These would need to be significantly scaled up through the entire area on the Carrant, Squitter brooks and Tirlle brooks and at least 5 small tributaries of the Tirlle Brook to holistically increase storage of the watercourse and associated land and improve the ecological quality of these waterbodies.

Transferable and scalable restoration measures undertaken locally to date include

- restoring meanders to restore stream length, raise bed and water levels, create backwaters braided channels and reintroducing spawning gravels
- significant re-profiling, slackening or terracing of multiple inside bends to improve geomorphological diversity.
- in stream habitat improvements such as woody debris groynes removing or modifying barriers to fish movement
- some localised control of invasive alien species notably giant hogweed creation of species rich floodplain meadows
- increasing the diversity and storage capacity and roughness of the floodplain through the creation of scrapes, ponds and backwaters.
- Riparian tree planting and fencing
- Orchard planting

The minimum 8m required to ensure access for maintenance will not be adequate to achieve genuine and meaningful restoration.

The resilience of what are quite small vulnerable watercourses would be significantly enhanced through effectively increasing the lateral footprint of the wetted corridor. The potential effects of proposed Development in close proximity to the river corridors during the construction and operational phases include; loss of habitat, `squeezing` of the corridor, changing of land levels, typically land raising and overzealous/enthusiastic maintenance of the watercourse including removal of woody debris and overhanging limbs. Habitats and species will also be at risk of degradation as a result of increased human proximity and disturbance. Typical impacts include damage to plants through trampling; anti-social behaviour such as lighting fires and deposition of litter etc. and increased predation due to elevated number of predatory domestic cats.

The two principal watercourses, and their tributaries, that flow through the master plan area have been extensively modified, largely as a result of post-war land drainage improvements. Whilst they remain important features of wildlife value in the rural and suburban landscape, there are significant opportunities to naturalise, enhance and restore them. The

SEA update/ response

masterplan and proposed policy mitigation.

Scoping consultation response

SEA update/ response

Carrant, Tirlle and Squitter retain much of their meandering plan form, riparian vegetation and natural floodplain topography but have been deepened, reprofiled and in places straightened, which has impacted on their visual attractiveness and amenity value as well as creating more rapid downstream conveyance and in places scouring flow conditions. There are also locations with historic mill infrastructure and barriers to fish movement such as weirs. The tributaries have been significantly modified. The EA is keen to be a key stakeholder as regards this aspect of the blue/green infrastructure strategy and is willing to for example undertake site visits to existing and potential river restoration sites and share lessons learnt, albeit this is dependent on available resources at the time.

9. Health and Wellbeing

There is no reference to the role of natural green spaces to health and wellbeing in main body of the text.

SEA objectives and appraisal questions for the health and wellbeing theme:

We are very supportive of the Assessment questions; Provide and enhance the provision of community access to open green spaces; promote the use of healthier modes of travel, including active travel networks and improve access to the countryside for recreational use? We suggest that the question

‘Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths’ is slightly reworded to include green infrastructure and acknowledge the need to enhance natural assets and the PROW network.

The health and economic benefits and requirements of access to seminatural and farmed open green space can create a tension with improving biodiversity and enhancing local habitat to create an ecologically rich landscape network. These can be exacerbated by flood plain and land management constraints. Careful consideration needs to be given to the seasonal limitations inherent in relying on floodplain as a major component of green space. Whilst, for example, a flooded meadow can create a sense of spectacle and enhance seasonal awareness recreational areas, paths and cycle routes which are wet, muddy and silt covered for much of the year do not always fulfil the expectations and requirements for health promoting environments and inhibit the predicted or desired non-vehicular activity or physical exercise. In other words a wide topographic range of river corridor green space needs to be retained undeveloped.

If a network of high-quality open spaces is to be multifunctional, well managed and linked to the wider countryside we recommend that that full public access is not mandatory for all areas. It is important to ensure that this does not preclude or prevent sustainable and effective management of some habitats and landscape features. It is appropriate to have a hierarchy of public access in order to ensure, for example, that areas of species rich grassland, which should be a keystone of habitat compensation, can be grazed without stock being endangered by dogs or human disturbance at certain times of the year. Another important consideration is that grazing stock need access to land which is not frequently inundated or needs more time-critical and less intensive grazing, such as flood

Noted, with thanks. The updated scoping information provided in this appendix references the multifunctional role of natural green spaces in supporting the health and wellbeing of residents and visitors. The suggested update has been made to the assessment questions.

Scoping consultation response

SEA update/ response

plain meadows. In other words, to allow sufficient flexibility for effective management of the more natural and river focused green infrastructure a buffer beyond land designated as floodplain needs to be left undeveloped and creatively incorporated.

Co-operation in design and place-making with surrounding farmers and graziers and users of green space will be facilitated by the allocation of a suitably generous green infrastructure which plans ahead for integration between existing and new communities and overlaps with theme 8. Population and Communities

10. Transport

Noted with thanks.

SEA objectives and Assessment Questions

We are very supportive of encouraging a modal shift to more sustainable forms of transport such as walking and cycling including the provision of access through quality greenspace which will benefit health and wellbeing and connectivity. However, the construction of surfaced paths, cycle tracks and multi-user routes have their own impacts and need appropriate mitigation with respect to, for example, siting away from vulnerable features, areas that are regularly inundated, changes in topography and sensitive and appropriate disposal of cut fill.

Biodiversity

Policy context

The EU Biodiversity Strategy¹⁰ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework¹¹ (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'
- Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape across local authority boundaries.
- Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising

¹⁰ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0244&from=EN> [accessed 07/12/18]

¹¹ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_w eb.pdf

impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.

- To protect and enhance biodiversity and geodiversity, plans should:
 - Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
 - Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
- The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

The Natural Environment White Paper (NEWP)¹² sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal wellbeing. It was in part a response to the UK's failure to halt and reverse the decline of biodiversity by 2010, and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halve biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Biodiversity 2020: A strategy for England's wildlife and ecosystem services¹³ aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.

¹² HM Gov (2011) The Natural Choice: securing the value of nature [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf

¹³ DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

The 25 Year Environment Plan¹⁴ sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;
- Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity SEA theme.

The Biodiversity Action Plan (BAP) for Gloucestershire, consolidated by the Gloucestershire Local Nature Partnership contains a series of Habitat Action Plans and Species Action Plans. These take into account national priorities using the knowledge of local experts to devise what action needs to be taken 'on the ground' to conserve and enhance biodiversity.

The following policy of the TBLP directly relates to the Biodiversity theme:

Policy NAT1 Biodiversity, Geodiversity and Important Natural Features:

"Development proposals that will conserve, and where possible restore and/or enhance, biodiversity will be permitted".

Baseline information

Internationally designated sites

There are no internationally designated sites within the Neighbourhood Plan area. The closest international site is Dixton Wood SAC (3.4km from the eastern boundary). Additionally, Bredon Hill SAC is situated 3.7km from the northern boundary. However, the Plan area lies within the hydrological catchment of the Severn Estuary internationally designated site (SAC/SPA/Ramsar) and includes functionally linked habitat necessary for some of the migratory fish elements to complete their lifecycles; notably the European eel which is suffering a catastrophic decline. The Tirlle brook drains into the Swilgate which has an unobstructed confluence with the Severn increasing its significance and connectivity for fish.

Nationally designated sites

¹⁴ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

There are no nationally designated sites within the Plan area, though the following sites are within 5km of the Plan boundary:

- Severn Ham, Tewkesbury Site of Special Scientific Interest (SSSI) (1.5km from the west boundary)
- Old River Severn, Upper Lode SSSI (1.6 km from the west boundary)
- Turvey's Piece SSSI (1.8km from the south west boundary)
- Dixton Wood SSSI (3.4km from the east boundary)
- Upham Meadow and Summer Leasow SSSI (2.2km from the north boundary)
- Rectory Farm Meadows SSSI (3km from the north boundary)
- Beckford Gravel Pit SSSI (2.2km from the east boundary)
- Alderton Hill Quarry SSSI (4.9km from the east boundary)
- Windmill Tump SSSI (4.3km from the north boundary)
- Chaceley Meadow SSSI (4.3 from the west boundary)
- Coombe Hill Canal SSSI (4.4km from the south west boundary)

Locally designated sites

The Gloucestershire County Council Policies map notes one Local Wildlife Sites (LWS) within the Plan area, and one local nature reserve in nearby Tewkesbury, detailed below.

Walton Cardiff Ponds LWS

The Walton Cardiff Ponds LWS is situated in the south west part of the Plan area. Small areas surrounding Walton Cardiff are defined by the Tewkesbury Local Plan as being key wildlife sites identified for great crested newts and for containing traditional orchards.

Tewkesbury Nature Reserve

Tewkesbury Nature Reserve is a newly established nature reserve that provides a safe haven for local wildlife and is situated less than 1km from the western Plan boundary, adjacent to Walton Cardiff. A number of reports have been produced by the monitoring group for the nature reserve which identify a number of mammals, birds and insects which reside within the area. The Tirlle catchment drains into the site so there is a mechanism for direct adverse hydrological impacts as well as increased visitor pressure.

Habitats

The Government's 25 Year Environment Plan includes provision for a Nature Recovery Network (NRN) and states that it will deliver on the recommendations of the Lawton Report and that recovering wildlife will require more habitat; in better condition; in bigger patches that are more closely connected. In this respect, a series of habitat network maps have been collated by Natural England to provide a baseline for habitat creation, enhancement and restoration. In this regard, a number of 'Network Enhancement Zones' have been presented using Magic Map software. In this respect, the following parts of the Plan area fall within Network Enhancement

Zone 1 ('land connecting existing patches of primary and associated habitats which is likely to be suitable for creation of the primary habitat'):

- A large area within Aston on Carrat, extending through Aston Cross and ceasing at Pamington.
- A large area through the centre of the Plan area extending from Walton Cardiff to Claydon Farm.

Additionally, there are a number of different habitats identified within the Plan area that have the potential to harbour a variety of plant and animal species, and may be susceptible to the effects of development, as follows:

- Waterbodies.
- Deciduous woodland – a number of small parcels of land scattered across the Plan area, such as Milne's Covert (west), Pamington Court Farm (centre) and the Laurels (north).
- Woodland- a number of larger areas of land such as several parcels of land just east and south of Claydon Farm.
- Woodland (young trees)- the area just west of Goodlands farm (north east).
- Traditional Orchard- a number of small parcels of land, such as those in the Aston Carrat settlement (north).
- Coastal and floodplain grazing marsh- such as the land adjacent to the River Swilgate bordering the west of the Plan boundary.

Species

Alongside species of European eel, otter and Great Crested Newt, the following protected species have the potential to be present in the Neighbourhood Plan area:

Bird species

- Skylark
- Cuckoo
- House Sparrow
- Song Thrush
- Dunnock
- Starling
- Linnet
- Lesser Redpoll
- Reed Bunting
- Herring Gull

Butterfly species

- Large White
- Meadow Brown
- Small White
- Green veined White
- Large Skipper
- Small Tortoiseshell
- Marbled White
- Common Blue
- Painted Lady
- Gatekeeper
- Comma
- Small Copper
- Six spot burnet
- Holly Blue
- Red Admiral
- Moth species

According to data presented in the 2011 report, 83 species of moth were identified within the Tewkesbury Nature Reserve. Furthermore, the Gloucestershire Invertebrates Group recorded over 40 species of invertebrates in 2011.

Future baseline

Habitats and species will potentially face increasing pressures from future development within the Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, with the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance priority habitats but maintain the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised, both within the Plan area and in the surrounding areas.

Climate change

Policy context

Key messages from the National Planning Policy Framework¹⁵ (NPPF) include:

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).
- Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.
- Plans should take account of the effects of climate change in the long term, considering a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.

One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon

¹⁵ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

economy.’ ‘The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

The Flood and Water Management Act (2010)¹⁶ sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

The UK Climate Change Act¹⁷ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK’s emissions. The 100% target was based on advice from the CCC’s 2019 report, ‘*Net Zero – The UK’s contribution to stopping global warming*’ and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding ‘carbon budgets’. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK’s long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change’s Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

The Committee of Climate Change published a 2012 report entitled ‘How Local Authorities Can Reduce Emissions and Manage Climate Change Risk’¹⁸ which emphasises the crucial role councils have in helping the UK meet its carbon targets

¹⁶ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

¹⁷ HM Government (2008): ‘Climate Change Act 2008’ [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents>

¹⁸ CCC (2012) ‘How local authorities can reduce emissions and manage climate risks’ [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from local authorities.

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report¹⁹ containing six priority risk areas requiring additional action in the next five years:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The Clean Air Strategy²⁰ released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'²¹ which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities.

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)²² sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

¹⁹ DEFRA (2017) 'UK Climate Change Risk Assessment Report January 2017' [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

²⁰ HM Gov (2019) Clean Air Strategy 2019 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

²¹ CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

²² Department for Transport (2020) Decarbonising Transport: Setting the Challenge [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.²³ This builds on the Government's determination to make buses work better for their passengers. The details of these programmes will be announced in the upcoming National Bus Strategy, to be published later in 2020, and follows the allocation of £170 million to support more electric buses, increase rural mobility and trial new 'Superbus' services.

Cycle routes will also see a major boost across the country with over 250 miles of new, high-quality separated cycle routes and safe junctions in towns and cities to be constructed across England, as part of the multibillion-pound package announced.

All Local Authorities in Gloucestershire have declared a climate emergency. Building on this, Gloucestershire County Council introduced a Climate Change Strategy (2019) which outlines how the County Council will become net carbon zero by 2030, and deliver a carbon neutral county by 2050, working with partners to deliver an 80% reduction by 2030.²⁴

The Green Infrastructure Pledge for Gloucestershire²⁵ outlines the following 'green vision' for the County:

'Our vision is of a greener Gloucestershire. Where nature-based solutions are threaded through urban areas, providing a multi-functional approach to the design and management of urban infrastructure, open spaces and recreation grounds; where the benefits of nature create a more resilient county for both people and wildlife, not just to protect but to support growth, whether that is environmentally, socially or economically; where consideration is given to upstream and downstream solutions and services that nature provides; where environmental net gain is demonstrated through green infrastructure; and where this is brought about by numerous joined-up, local level initiatives across the county'.

Tewkesbury Borough Council declared a climate emergency in October 2019²⁶. As part of this commitment, the Council's Climate Change and Flood Risk Management Group (CCFRMG) was created to consider all aspects of climate change and initially tasked with working with Officers to oversee the delivery of an audit to consider the Council's current position, together with an action plan setting out how carbon neutrality by 2030 could be achieved. The CCFRMG have also contributed towards the development of an audit report and action plan (Tewkesbury Borough Council, 2019)²⁷ to meet subsequent commitments.

The following policy of the TBLP directly relates to the Climate Change theme:

Policy NAT3 – Green Infrastructure: Building with Nature: *“Development must contribute, where appropriate to do so and at a scale commensurate to the proposal, towards the provision, protection and enhancement of the wider green infrastructure network”.*

²³ Department for Transport (2020) Major boost for bus services as PM outlines new vision for local transport [online] available at: <https://www.gov.uk/government/news/major-boost-for-bus-services-as-pm-outlines-new-vision-for-local-transport>

²⁴ Gloucestershire County Council (2019): 'Climate Change Strategy' [online] available at: <https://www.gloucestershire.gov.uk/media/2094404/gloucestershire-climate-change-strategy.pdf>

²⁵ Gloucestershire Local Nature Partnership (2019): 'The Green Infrastructure Pledge' [online] available at: <https://www.gloucestershirenature.org.uk/green-infrastructure-pledge>

²⁶ Tewkesbury Borough Council (2019): 'Climate Change and Carbon Reduction Audit and Action Plan' [online] available at: <https://minutes.tewkesbury.gov.uk/documents/s39782/Climate%20change%20and%20carbon%20reduction%20audit%20report%2008072020%20Executive.pdf>

²⁷ Ibid.

Baseline information

Research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team.²⁸ UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the South West during the period 2020-2039 compared to the period 1981-2000 are likely to be as follows:

- A central estimate of increase in annual mean temperatures of between 0°C and 1°C; and
- A central estimate of change in mean precipitation of 0 to +10% in winter and 0 to -10% in summer.

During the period 2040-2059 this is estimated further as:

- A central estimate of increase in annual mean temperatures of between 1°C and 2°C; and
- A central estimate of change in annual mean precipitation of 0 to +20% in winter and -10% to -20% in summer.

Due to these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100-year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;

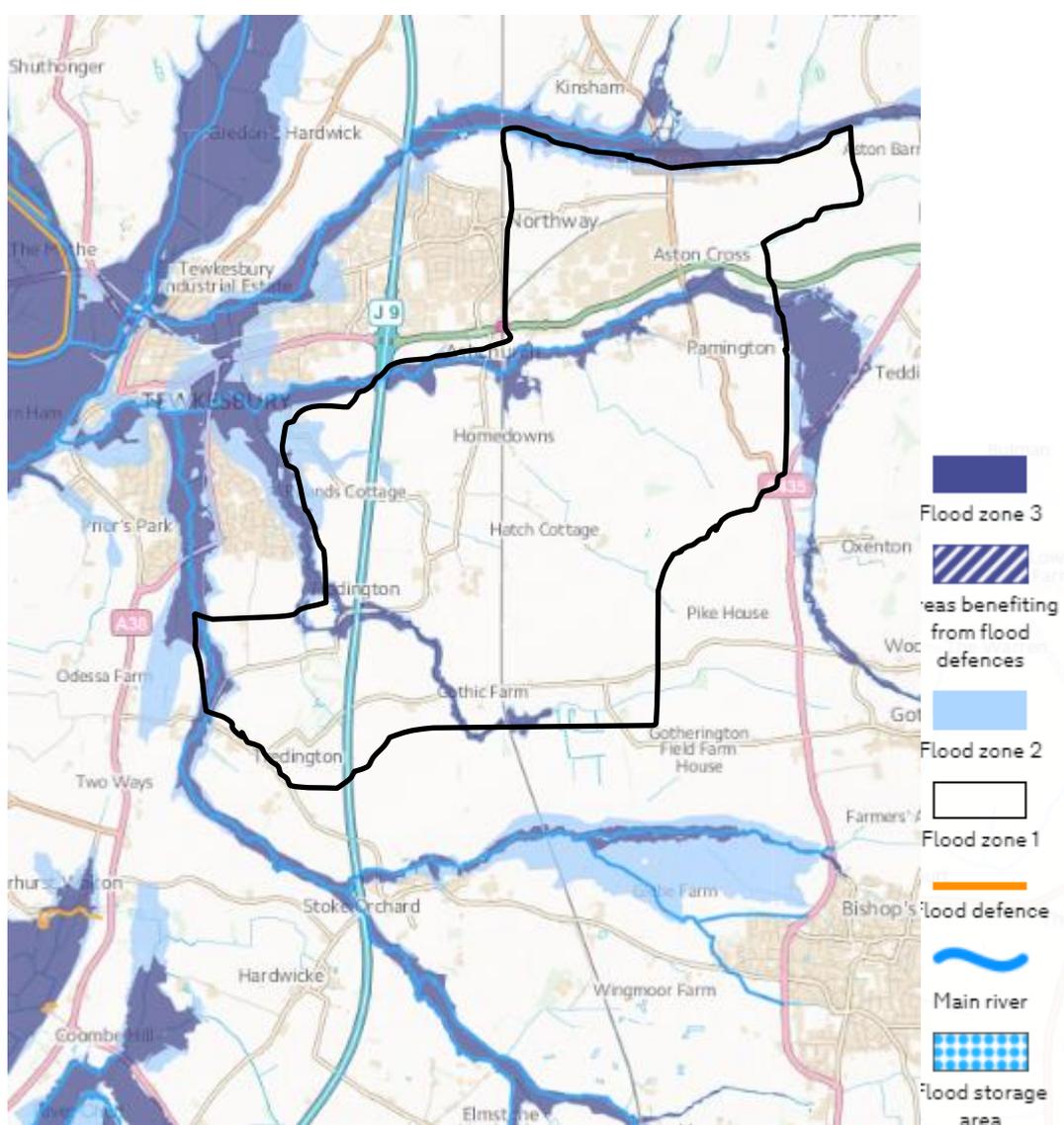
²⁸ UKCP18 (2018): 'UK Climate Predictions' [online] available at: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/about>

- Spread of species at the northern edge of their distribution;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads. ²⁹

Flood risk

As shown in **Figure AB.1** (below), areas of highest fluvial flood risk lie adjacent to the Tirlle Brook in the centre of the Plan area, just south of the main settlement of Ashchurch, and the Carrant Brook, which borders the north easternmost part of Ashchurch Rural Parish.

Figure AB.1: Fluvial flood risk (approximate Plan area shown in black)³⁰



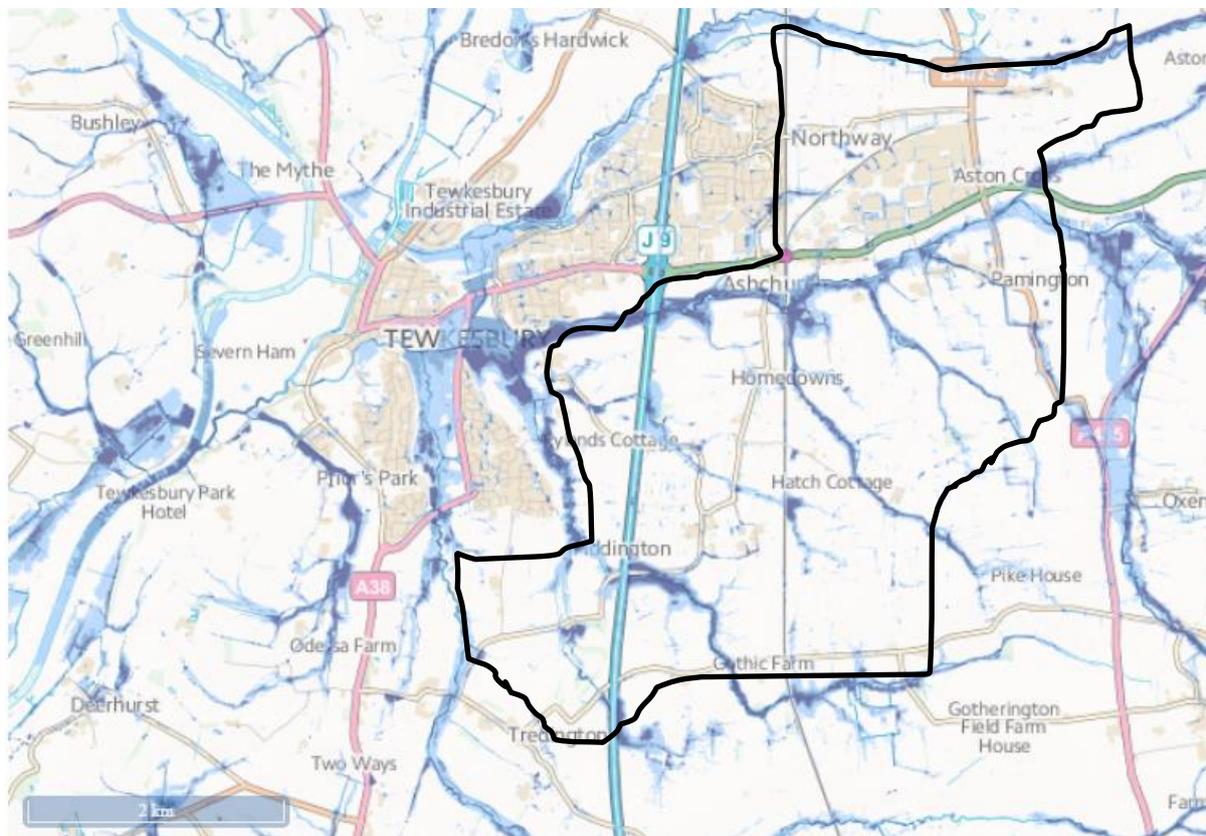
The extent of surface water flooding shown in **Figure AB.2** (overleaf) indicates a number of high-risk areas, including aforementioned areas adjacent to the Tirlle and

²⁹ Gov UK (2020); 'Flood Map for Planning' [online] available at: <https://flood-map-for-planning.service.gov.uk/>

³⁰ Provided within the limitations of the EA Flood Risk Map for Planners.

Carrant Brooks, and concentrated parts of Gothic Farm and Aston Cross. Areas of medium risk pass through Homedowns, Hatch Cottage and Fiddington.

Figure AB.2: Surface water flood risk (approximate Plan area shown in black)³¹



Extent of flooding from surface water



Green infrastructure development holistically restoring and re-naturalising watercourses, associated land, floodplains and wetlands can increase space for water and wildlife to benefit Ashchurch Rural parish but also downstream residents. A key issue or measure of success in protecting and enhancing ecology and biodiversity and increasing resilience to climate change is the scale and quality of measures, including the carbon sequestration role of habitats.

Carbon dioxide emissions

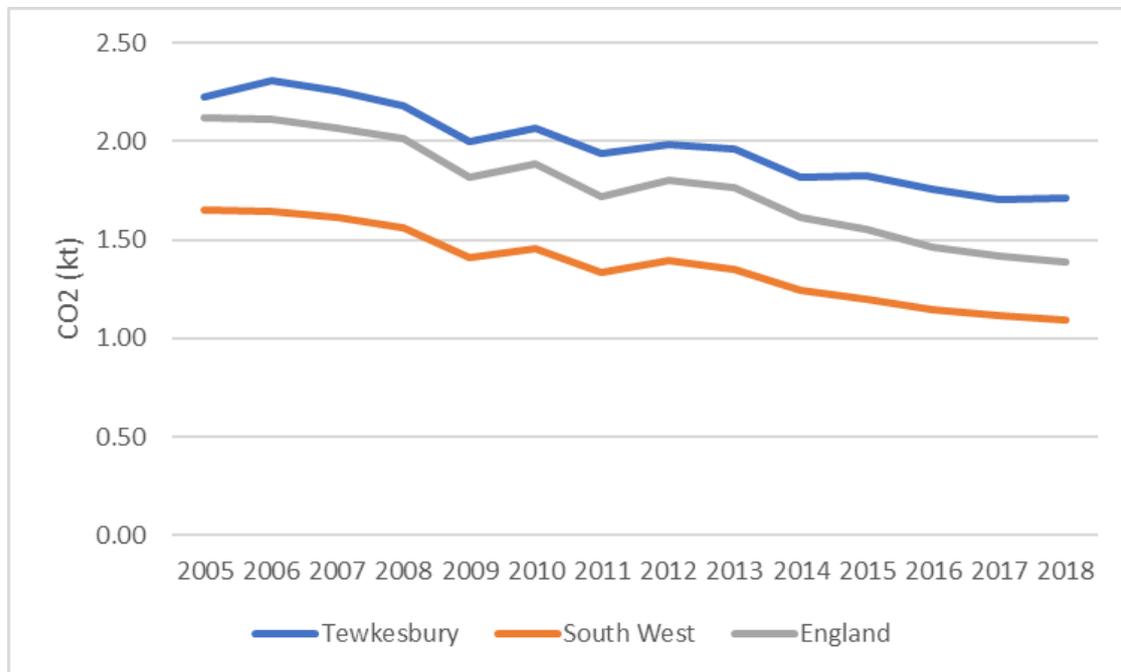
Reducing greenhouse gas (GhG) emissions from the built environment is widely acknowledged as a key element of climate change mitigation. CO₂ emissions in particular are associated with a changing climate and will become an area of even greater focus for mitigating climate change following Tewkesbury Borough Council's declaration of a climate emergency in August 2019³². CO₂ emissions from the built environment are monitored and recorded at Local Authority level. As shown in **Figure AB.3** (overleaf), emissions in Tewkesbury are comparatively higher than for the region and country as a whole. However, emissions have been decreasing at a similar rate to regional and national trends.

³¹ It is noted that this information can replicate fluvial flood risk at some of the smaller watercourses.

³² Tewkesbury Borough Council (2019): 'Council takes action after declaring a climate emergency' [online] available at: <https://www.tewkesbury.gov.uk/news/Council%20takes%20action%20after%20declaring%20a%20climate%20emergency>

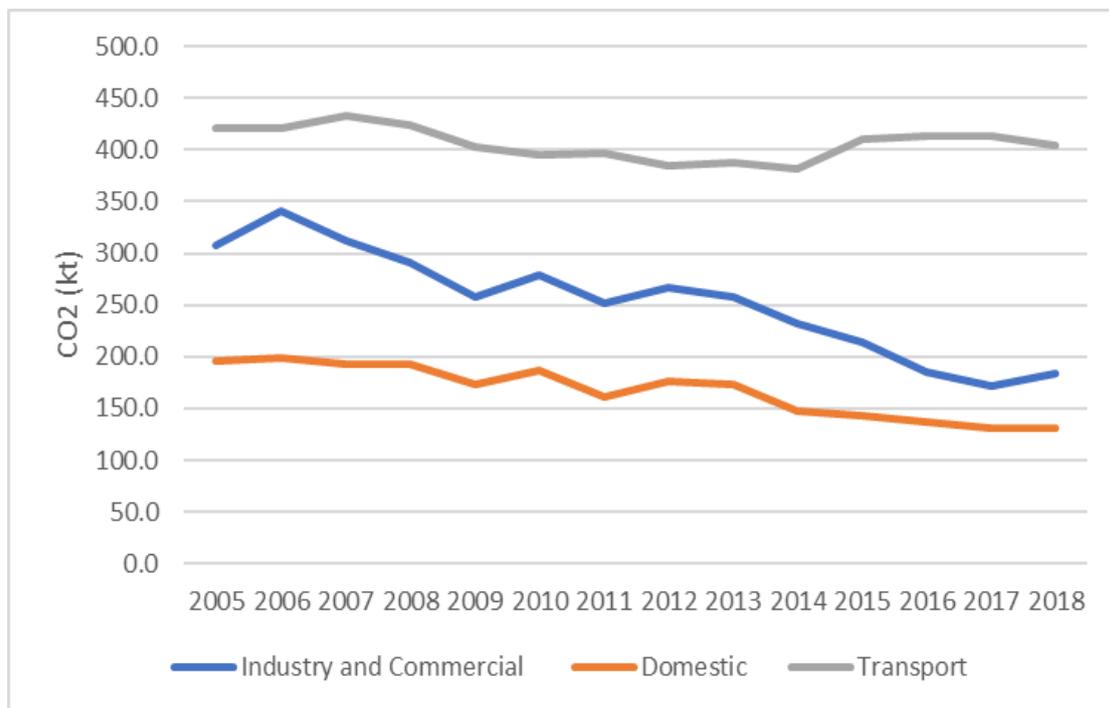
Figure AB.4 (overleaf) shows the trends in CO₂ emissions from different industries in the Plan area. The transport sector contributes the most towards emissions in Tewkesbury (56.9% of total emissions). The strategic road network and other A roads are the largest contributor towards total emissions in the transport sector.

Figure AB.3: CO₂ emissions in the Plan area (2005- 2018)



Source: Gov UK, 2018

Figure AB.4: Carbon Emissions for Sectors in Tewkesbury Borough (2005-2018)



Source: Gov UK, 2018

The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

Electric vehicles (EVs) do not burn fuel and create almost no noise. They are battery powered and have the potential to be 'zero-emission vehicles' (ZEVs) if powered by renewable electricity. In terms of the Neighbourhood Plan area, there are no EV charging points within the Plan area, and only a small number just beyond the Plan area in Walton Cardiff (one slower charging point at Bryon Close and two fast charging points at the Tewkesbury Council building and Park). These are shown in **Figure AB.5** below.

Figure AB.5: EVs in the Plan area (approximate locations shown in red)



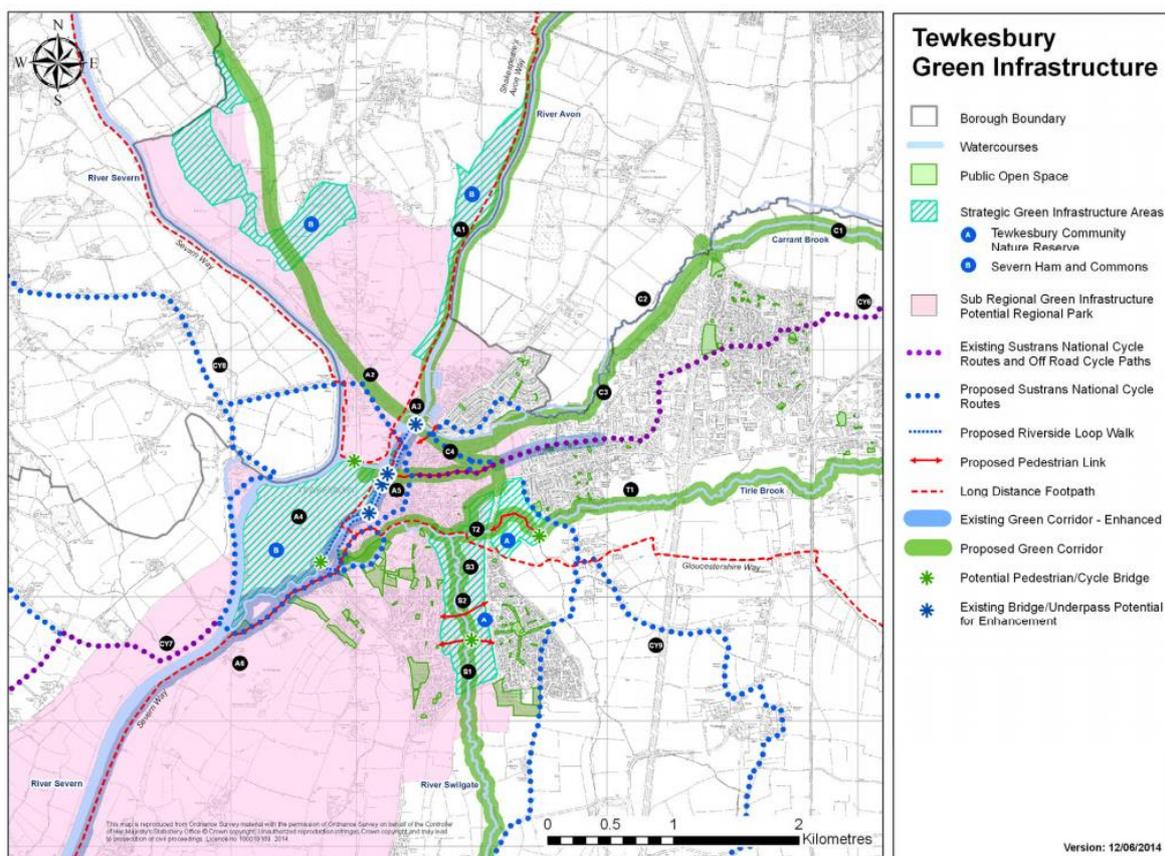
Source: Zapmap, 2021

Green Infrastructure

The Green Infrastructure (GI) Strategy for Tewkesbury³³ presents a number of improvements to be made to the current GI links within the settlement and beyond. **Figure AB.6** (overleaf) shows the GI infrastructure for Tewkesbury. The Tyre Brook presents a proposed green corridor within the Plan area.

³³ Unknown author (2014): 'Green Infrastructure Strategy' [online] available: https://www.gloucester.gov.uk/media/1107/jcs_green_infrastructure_strategy_june_2014.pdf

Figure AB.6: Tewkesbury Green Infrastructure



Future baseline

In line with UK trends and national commitments, emissions are likely to continue to fall as energy efficiency measures, renewable energy take-up and new technologies, such as EVs and solar PV, become more widely adopted. Notably, the Government has consulted on changes to England’s Building Regulations introducing a ‘Future Homes Standard’ and the Department for Transport recently published ‘Decarbonising Transport; setting the challenge’ a first step towards publishing a full transport decarbonisation plan later in 2020.

The UK Government’s plan for renewable energy forms part of wider efforts to ensure the UK meets its legally binding target to reach net zero emissions by 2050 and build back greener from coronavirus.

Flood risk within the Plan area is notably high for particular settlements and therefore has the potential to pose significant risk for local residents over the course of the Neighbourhood Plan period.

Historic environment

Policy context

Key messages from the National Planning Policy Framework (NPPF) include:

- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.

These messages are supported by the national Planning Practice Guidance (PPG)³⁴ which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.

The national design guide (2019)³⁵ sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’³⁶ directly relates to the Historic Environment.

Historic England is the statutory body that helps people care for, enjoy and celebrate England’s spectacular historic environment. Guidance and advice notes provide

³⁴ Ministry of Housing, Communities and Local Government (2016), Planning Practice Guidance [online], available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

³⁵ MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

³⁶ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2019)³⁷ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development and provides information on the relationship with local and neighbourhood plans and policies. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of Conservation Areas.
- Clearly identifying those issues that threaten the area's character or appearance and that merit the introduction of management measures.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)³⁸ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)³⁹ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁴⁰ outlines the importance of considering the historic environment

³⁷ Historic England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1' [online] available from: <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

³⁸ Historic England (2016): 'SA and SEA: Advice Note 8' [online] available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

³⁹ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

⁴⁰ Historic England (2018): 'Neighbourhood Planning and the Historic Environment' [online] available at: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

Historic England Advice Note 7 'Local Heritage Listing'⁴¹ supports local authorities and communities to introduce a local list in their area, encouraging a more consistent approach to the identification and management of local heritage assets across England. Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. They enable the significance of any building or site on the list (in its own right and as a contributor to the local planning authority's wider strategic planning objectives), to be better taken into account in planning applications affecting the building or site or its setting.

Local

The following policies of the TBLP relate to the Historic Environment theme:

Policy HER2 - Listed Buildings: *“Alterations, extensions or changes of use to Listed Buildings, or development within their setting, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings”.*

Policy HER4 - Archaeological Sites and Scheduled Monuments: *“Scheduled Monuments and sites of national archaeological importance will be preserved in situ. Development which would lead to substantial harm or loss of these sites and their setting should be wholly exceptional and will not normally be permitted”.*

Policy HER5 Locally Important Heritage Assets: *“Locally Important Heritage Assets will be conserved having regard to the significance of the asset and its contribution to the historic character of the area”.*

Baseline information

Designated historic assets

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms.

There are a total of 22 listed buildings in the Neighbourhood Plan area, presented in **Table AB.1**. Of these four are Grade II* listed and 18 are Grade II listed.

Table AB.1: Listed Buildings

Grade Title of building

II*	Manor Farm Fiddington
II*	Dovecote Circa 75 Metres South East Of Manor Farm Fiddington
II*	Church Of St Nicholas Ashchurch Village
II*	The Manor Aston On Carrant Aston On Carrant

⁴¹ Historic England (2016): 'Local Heritage Listing: Advice Note 7', [online] <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>

Grade Title of building

II	Rudgeway Farmhouse
II	Yeend Monument In The Churchyard Of The Church Of St Nicholas Circa 7 Metres East Of South Porch Ashchurch Village
II	The Rectory Ashchurch Village
II	Grange Farm Aston On Carrant Aston On Carrant
II	Guy's Manor Cottage Aston On Carrant Aston On Carrant
II	The Dovecote Cifca 25 Metres South Of The Manor Aston On Carrant Aston On Carrant
II	Open Sided Store Circa 35 Metres South Of Barn At Manor Farm Fiddington
II	The Stirrups Pamington
II	The Tudor Cottage Pamington
II	Rectory Farmhouse Fiddington
II	The Thatched Cottage Pamington
II	Elm Cottage Pamington
II	Barn/Store Circa 20 Metres North Of Rudgeway Farm
II	John Rowles Monument In The Churchyard Of The Church Of St Nicholas Circa 7 Metres South Of South Porch Ashchurch Village
II	Brook House Aston On Carrant Aston On Carrant
II	The Old Forge Aston On Carrant Aston On Carrant
II	Barn/Store Circa 15 Metres South Of Manor Farm Fiddington
II	Church Farmhouse Ashchurch Village

Source: Historic England, 2020

There is one scheduled monument within the Plan area: 'The Deserted Medieval Village'. The monument, which falls into two separate areas of protection, includes the deserted medieval village of Walton Cardiff situated on the banks and floodplain of a confluence of two tributaries to the Tirlle Brook. The village survives differentially as entirely buried building platforms, boundaries, hollow ways and ancillary structures including at least three successive churches within a moat and a manor house or as slight earthworks which are best preserved on the western side. The following is detailed by Historic England as the reason for designation:

"The village, comprising a small group of houses, gardens, yards, streets, paddocks, often with a green, a manor and a church, and with a community devoted primarily to agriculture, was a significant component of the rural landscape in most areas of medieval England, much as it is today. Villages provided some services to the local community and acted as the main focal point of ecclesiastical, and often of manorial, administration within each parish. Although the sites of many of these villages have been occupied continuously down to the present day, many others declined in size or were abandoned throughout the medieval and post-medieval periods, particularly during the 14th and 15th centuries. As a result over 2000 deserted medieval villages are recorded nationally. The reasons for desertion were varied but often reflected declining economic viability, changes in land use such as enclosure or emparkment, or population fluctuations as a result of widespread epidemics such as the Black Death. As a consequence of their abandonment these villages are frequently undisturbed by later occupation and contain well-preserved archaeological deposits.

Because they are a common and long-lived monument type in most parts of England, they provide important information on the diversity of medieval settlement patterns and farming economy between the regions and through time.”⁴²

There are no conservation areas within the Neighbourhood Plan area.

Heritage at Risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the grade I and grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be ‘at risk’. As of January 2021⁴³, there are no assets at risk within the Plan area.

Gloucestershire Historic Environment Record (HER)

Gloucestershire's Historic Environment Record (HER) holds over 42,000 computerised records across the County.⁴⁴ Access to data on the HER is available on request though is not accessible free of charge. Information for Ashchurch Rural (and Gloucestershire) is also not available via the Heritage Gateway.

Locally Important Heritage Features

It should be noted that not all the area’s historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings in the area are likely to be of value. These include:

- Ashchurch War Memorial, situated on the grounds of Ashchurch Primary School⁴⁵;
- Public buildings such as Ashchurch Village Hall; and
- The Ashchurch Village settlement, which, as the result of archaeology investigations during the re-alignment of the A46 was discovered to have been occupied from around 400 AD during Romano-British times, consists of key facilities such as the primary school, village hall and, in particular, St Nicholas's Church with its quiet breathing space, green area and trees.

Summary of Future baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

⁴² Historic England (n.d.): ‘Deserted Medieval Village’ [online] available at: <https://historicengland.org.uk/listing/the-list/list-entry/1002071>

⁴³ Gloucestershire County Council (2020): ‘Heritage at Risk 2020’ [online] available at: <https://historicengland.org.uk/images-books/publications/har-2020-registers/sw-har-register2020/>

⁴⁴ Gloucestershire County Council (2020): ‘Gloucestershire HER’ [online] available at: <https://www.gloucestershire.gov.uk/planning-and-environment/archaeology/request-archaeological-data-from-gloucestershires-historic-environment-record-her/>

⁴⁵ Ashchurch Rural Parish Council (n.d.): ‘Ashchurch War Memorial’ [online] available at: <http://ashchurchruralpc.org.uk/amenities/war-memorial/>

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.

Landscape

Policy context

Key messages from the National Planning Policy Framework⁴⁶ (NPPF) include:

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.

Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.

Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.

The national design guide (2019)⁴⁷ sets out the characteristics of well-designed places and demonstrates what good design means in practice. It is based on national planning policy, practice guidance and objectives for good design as set out in the National Planning Policy Framework. Specific, detailed and measurable criteria for good design are most appropriately set out at the local level.

⁴⁶ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

⁴⁷ MHCLG (2019) National Design Guide [online] available at: <https://www.gov.uk/government/publications/national-design-guide>

National Character Area (NCA) profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics.⁴⁸ NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.

The Government's 25 Year Environment Plan⁴⁹ states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England. Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment" directly relates to the Landscape.

Baseline information

National landscape characteristics

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. In this regard, the Neighbourhood Plan area falls within the 'Severn and Avon Vales' NCA⁵⁰. Key characteristics of this NCA include:

- A diverse range of flat and gently undulating landscapes strongly influenced and united by the Severn and Avon rivers which meet at Tewkesbury.
- Prominent oolitic limestone outliers of the Cotswold Hills break up the low-lying landscape in the south-east of the area at Bredon Hill, Robinswood Hill, Churchdown Hill and Dumbleton Hill. West of the Severn the Mercia Mudstones predominate, producing poorer silty clay soils. Lias clays in the Avon Valley and east of the Severn create heavy but productive soils. River terrace gravels flank the edges of watercourses.
- Woodland is sparsely distributed across this landscape but a well wooded impression is provided by frequent hedgerow trees, parkland and surviving traditional orchards. Remnants of formerly extensive Chases and Royal Forests, centred around Malvern, Feckenham and Ombersley still survive.
- Small pasture fields and commons are prevalent in the west with a regular pattern of parliamentary enclosure in the east. Fields on the floodplains are divided by ditches (called rhines south of Gloucester) fringed by willow pollards and alders.
- Pasture and stock rearing predominate on the floodplain and on steeper slopes, with a mixture of livestock rearing, arable, market gardening and hop growing elsewhere.

⁴⁸ Natural England (2012) 'National Character Area profiles' [online] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴⁹ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁵⁰ Natural England (2014): 'Severn and Avon Vales' [online] available at: <http://publications.naturalengland.org.uk/publication/1831421>

Local landscape characteristics

Ashchurch Rural Parish lies to the east of the town of Tewkesbury. The Parish contains seven small settlements connected by a network of back roads, public footpaths and cycle ways. The M5 crosses the parish in its western quadrant in a north/south direction and the A46 crosses the parish at its Northern quadrant. M5 Junction 9 is the intersection of the M5 and the A46. The M5 and A46 have determined the form of built development in the parish and most development is related to these routes. The remainder of the parish to the south of the M24 and the east of the M5 is largely rural and sparsely developed⁵¹.

Ashchurch Rural Parish can be divided into seven settlements, detailed below:

Aston on Carrant

Aston on Carrant is a self-contained rural settlement reliant on access to other towns and villages for services. Situated in the north-east of the Parish, it is bound to the north by the Carrant Brook and to the south by the disused railway line that formerly linked Ashchurch to Evesham. The settlement offers a rich historical stock of houses dating from the 11th Century, as well as being an ancient passing point for monks travelling from Evesham to Tewkesbury.

Pamington

This settlement lying to the east of the Parish is bound to the north by Tirl Brook and a curtain of poplar trees and to the south by the flat and low-lying agricultural land distinctive of Ashchurch Rural Parish. Pamington has a mixture of housing with new housing being built in a sympathetic manner to the existing settlement character.

Fiddington and Clayton

Fiddington is a small settlement lying in the south of the parish, defined by the central manor which was once a manor of Tewkesbury Abbey. Rich in history and settled maturely into the landscape, the houses surrounding the manor are also mature with gardens extending well out to the front and backs of the properties.

Walton Cardiff

Walton Cardiff village is similar in building character and layout to Pamington. The winding single road that provides restricted access from the north and south to the village should provide a safe and tranquil atmosphere throughout the settlement. Today, pylons create urban focal points and the landform is generally undulating to flat. Although the surrounding fields are mostly pastoral, Walton Cardiff does encompass some arable fields.

Aston Cross

Aston Cross is a hamlet on the cross roads of the A46 trunk road and B4079. The junction dominates the settlement and acts as a centre for a small distribution of houses and forms part of the MoD site's boundary. Houses differ in style, size and layout. There seems to be no distinctive character within this part of the Parish.

Natton

⁵¹ Ashchurch Rural Parish Council (2019): 'Draft Plan Reg 14' [online] available at: <http://ashchurchruralpc.org.uk/assets/neighbourhood-plan/REGULATION-14-DRAFT-ARNDP-rcvd-20200601.pdf>

Natton lies to the south of the Tirl Brook and can be defined as a small hamlet. The settlement is defined to the east by the railway line. The hamlet accommodates up to nine residential properties and five businesses.

Ashchurch

Ashchurch settlement is arguably the centre of the parish where the church of St Nicholas is located as well as the local primary school and the village hall.

Gloucestershire Landscape Character Assessment (LCA)

The LCA for Gloucestershire identifies differing landscape types for the area. In this respect, the Ashchurch Plan area falls under the Landscape Character Type 'Settled Unwooded Vale'.

Settled Unwooded Vale is one of the most extensive character types within the Gloucester urban fringe. The character type is further subdivided into the Vale of Berkeley to the south of Gloucester, and the Vale of Gloucester to the east and north. The following key characteristics (drawn from the Gloucestershire LCA, 2006 and recent site investigation) can broadly be applied to the entire character area.

Key Characteristics⁵²

- Soft, gently undulating to flat landscape, but with intermittent locally elevated areas that project above the otherwise flatter landform;
- Area drained by a series of east west aligned tributaries of the Severn, including the Cam, Frome and Chelt, and the Stratford Avon flowing into the Severn from the north;
- Mixed arable and pastoral land use enclosed by hedgerow network, in places forming a strong landscape pattern;
- Limited woodland cover with mature hedgerow trees and occasional orchards;
- Rural areas bordered by large urban suburban areas and interspersed with commercial and industrial premises;
- Varied mix of building materials including brick, timber, and stone, and slate and thatch roofing;
- Proliferation of modern suburban building styles and materials;
- Major transport corridors pass through the Vale, frequently aligned north south, beyond which is a network of local roads and lanes linking villages and hamlets;
- and Widespread network of pylons and transmission lines.

Local landscape sensitivity

As noted in the Draft Plan (Ashchurch Rural Parish Council, 2019)⁵³, recent development has caused concerns to be raised by the local community about new urban influences upon the traditional rural character.

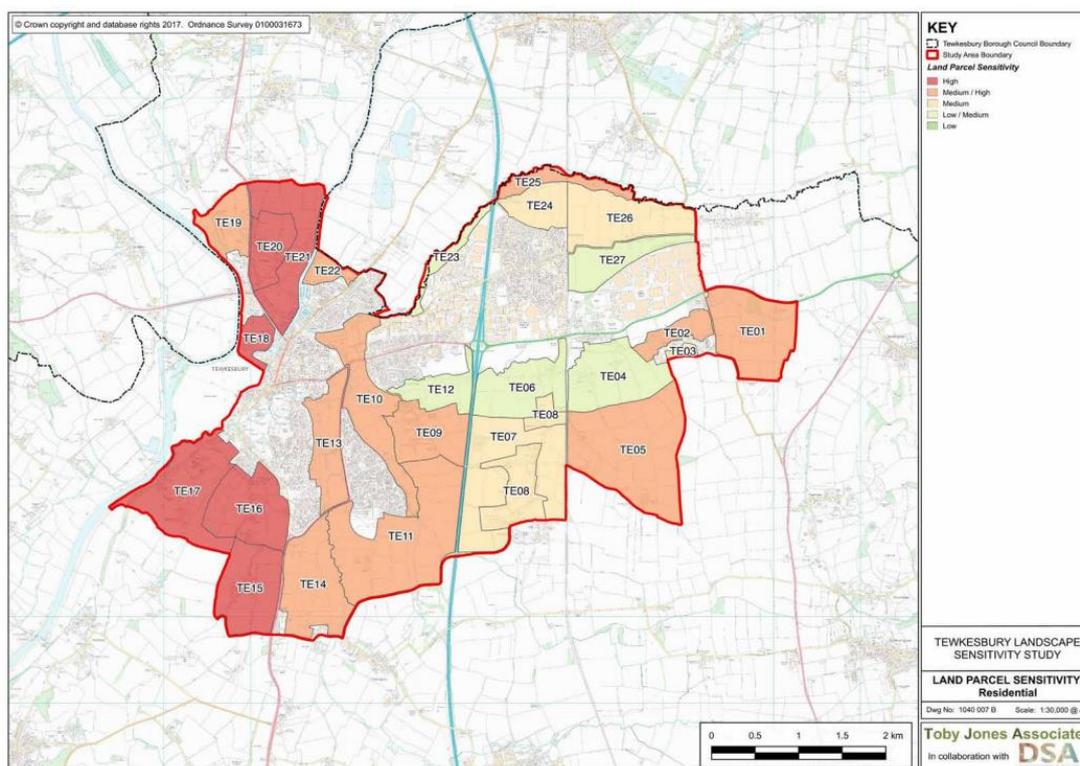
Tewkesbury Borough Council commissioned Toby Jones Associates Ltd (in collaboration with DSA Environment + Design Ltd) in February 2017 to undertake a

⁵² Gloucestershire County Council (n.d.): 'Landscape Characterisation Study and Analysis' [online] available at: <file:///C:/Users/lauren.egan/Downloads/JCS%20landscape%20characterisation%20assessment%20and%20sensitivity%20analysis.pdf>

⁵³ Ibid.

Landscape Sensitivity Study⁵⁴ of land surrounding Tewkesbury, including the Plan area. Land parcels that share similar characteristics were grouped and their resulting sensitivity in accordance with a range of factors and are illustrated in **Figure AB.7** below. Areas of highest sensitivity can be found in the parts of the Plan area which border Tewkesbury town in the south west.

Figure AB.7: Landscape sensitivity in Tewkesbury



Source: Toby Jones Associates, 2017⁵⁵

Future baseline

The scale of new development expected to be brought forward through the Masterplan, including infrastructure development, has the potential to lead to significant changes in landscape quality in and around the Neighbourhood Plan area. In the absence of the Neighbourhood Plan more speculative development may come forward within the open countryside or countryside setting, which could place increased pressure on local landscapes/ town/ villagescapes and their settings. This may negatively impact upon the landscape features which contribute to the distinctive character, special qualities and setting of the Settled Unwooded Vale.

New development that is appropriately scaled and designed, and landscape-led, has the potential to support the area's inherent landscape character and quality.

⁵⁴ Toby Jones Associates (2017): 'Tewkesbury Landscape Sensitivity Study' [online] available at: <file:///C:/Users/lauren.egan/Downloads/Landscape%20sensitivity%20study%20-%20Tewkesbury%20&%20Ashchurch.pdf>

⁵⁵ Ibid.

Land, soil and water resources

Policy context

Key messages from the National Planning Policy Framework⁵⁶ (NPPF) include:

- Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.
 - Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
 - Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land.
 - Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.
 - Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
 - Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
 - Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
 - Ensure that, wherever possible, development helps to improve local environmental conditions including water quality, taking into account relevant information such as river basin management plans.

Since July 2017 the Government’s Planning Practice Guidance (PPG) requires Local Planning Authorities to publish a Brownfield Land Register, and review it at least once a year, in order to identify all previously developed sites with potential for delivering new development. This is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield

⁵⁶ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

sites.⁵⁷ Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.⁵⁸

The Government's 25 Year Environment Plan was published in 2018 and presents the 'goals for improving the environment within a generation and leaving it in a better state than we found it'.⁵⁹ The implementation of this plan aims to achieve clean air, clean and plentiful water, reduced risk from environmental hazards, and managed exposure to chemicals. Specific policies and actions relating to environmental quality include:

- Improving soil health and restoring and protecting our peatlands;
- Respecting nature in how we use water;
- Reducing pollution; and
- Maximising resource efficiency and minimising environmental impacts at end of life.

Safeguarding our Soils: A strategy for England⁶⁰ sets out a vision for soil use in England which includes better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

The Water Framework Directive⁶¹ (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.

The Water White Paper 2011⁶² sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The Government's Water Strategy for England⁶³ (2008) provides strategy for the water sector up until 2030, which aims to sustainably deliver secure water supplies and an improved and protected water environment. It sets out actions within the following areas:

- Water demand;
- Water supply;
- Water quality;

⁵⁷ MHCLG (2017) Guidance: Brownfield Land Registers [online] available at: <https://www.gov.uk/guidance/brownfield-land-registers>

⁵⁸ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

⁵⁹ DEFRA (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

⁶⁰ DEFRA (2009) Safeguarding our Soils: A strategy for England [online] available at:

<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

⁶¹ Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy.

⁶² Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁶³ Defra (2011) Future Water: the Government's Water Strategy for England [online] available at:

<https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england>

- Surface water drainage;
- River and coastal flooding;
- Greenhouse gas emissions;
- Charging for water; and
- Regulatory framework, competition and innovation.

Water for life⁶⁴ (2011) sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

The National Waste Management Plan⁶⁵ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive⁶⁶. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

The EU Nitrates Directive (91/676/EEC) requires member states to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. These areas are designated as Nitrate Vulnerable Zones (NVZs) and as such are recognised as being at risk from agricultural nitrate pollution. Member states are required to establish Action Programmes in order to reduce and prevent further nitrate contamination.

The Draft Minerals Local Plan for Gloucestershire (2018 – 2032)⁶⁷ provides a policy framework for how mineral developments should take place across Gloucestershire, establishing that development should be directed away from areas where it may pose a risk of sterilising minerals deposits.

Baseline information

Watercourses and quality

The Neighbourhood Plan area falls within the Severn river basin district, and the Avon Warwickshire management catchment and Avon – Midlands west operational catchment. As shown on the Environment Agency's (EA) Data Explorer⁶⁸, there are a total of 22 waterbodies within the Avon – Midlands west operational catchment. Overall, the ecological quality of many of these waterbodies are of 'moderate' or 'bad' quality, whilst chemical status is poor, with all waterbodies 'failing' to meet recommended standards set by the EA. In the Plan area, the following waterbodies are present:

Tirle Brook - source to the confluence of the River Swilgate

⁶⁴ Defra (2011) Water for life [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

⁶⁵ DEFRA (2013) Waste Management Plan for England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

⁶⁶ Directive 2008/98/EC

⁶⁷ Gloucestershire County Council (2018): 'Draft Minerals Local Plan for Gloucestershire' [online] available at: <https://www.gloucestershire.gov.uk/media/14192/draft-minerals-local-plan-2018-2032-for-consultation.pdf>

⁶⁸ Environment Agency (2019): 'Catchment Data Explorer' [online] available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB109054032470>

The Tirl Brook flows through the centre of the Plan area, moving through Walton Cardiff, Ashchurch village and meandering round the easternmost boundary of the Plan area past Pamington. The stream flows north-west towards Tewkesbury, and eventually to the River Avon. Ecological quality and chemical status of the Brook are both low and/or poor, and have worsened over time (as shown in **Figure AB.8**, below). Reasons for not meeting EA standards include pollution from rural areas, pollution from waste water and physical modifications.

Figure AB.8: Ecological quality and chemical status

Classification Item	2013	2014	2015	2016	2019
Overall Water Body	Moderate	Poor	Poor	Poor	Poor
Ecological	Moderate	Poor	Poor	Poor	Poor
Chemical	Good	Good	Good	Good	Fail

Source: *Environmental Agency, 2019*

Carrant Brook - source to conf R Avon

Carrant Brook is a small tributary of the River Avon, its catchment area being land to the south of Bredon Hill. The brook for part of its course is the county boundary between Gloucestershire and Worcestershire. As shown in **Figure AB.9** (below), the brook has 'moderate' ecological quality but does not meet the EA standard for chemical status, with reasons including pollution from rural areas and pollution from wastewater.

Figure AB.9: Ecological quality and chemical status

Classification Item	2013	2014	2015	2016	2019
Overall Water Body	Poor	Poor	Moderate	Moderate	Moderate
Ecological	Poor	Poor	Moderate	Moderate	Moderate
Chemical	Good	Good	Good	Good	Fail

Additionally, the entirety of the Plan area falls within the River Swilgate Nitrate Surface Water Zone (NVZ) for surface water. Results from recent EA monitoring⁶⁹ indicate that water quality in this NVZ has deteriorated in the 2017 NVZ review period compared to the previous NVZ review.

Minerals

Gloucestershire County Council is the Minerals Planning Authority (MPA) for Tewkesbury Borough. In this regard, the Gloucestershire Draft Minerals Plan⁷⁰ indicates that a large section of the northern and small part of the centre of the parish falls within a Mineral Consultation Area (MCA) for Gloucestershire. Several areas also fall within the Mineral Safeguarding Area (MSA) sand and gravel resources. These are presented in **Figures AB.10- AB.11**.

⁶⁹ EA (2017): 'NVZ designation – River Swilgate' [online] available at: http://apps.environment-agency.gov.uk/static/documents/nvz/NVZ2017_S582_Datasheet.pdf

⁷⁰ Gloucestershire County Council (2018): 'Draft Minerals Local Plan for Gloucestershire' [online] available at: <https://www.gloucestershire.gov.uk/media/14192/draft-minerals-local-plan-2018-2032-for-consultation.pdf>

Figure AB.10: MCAs

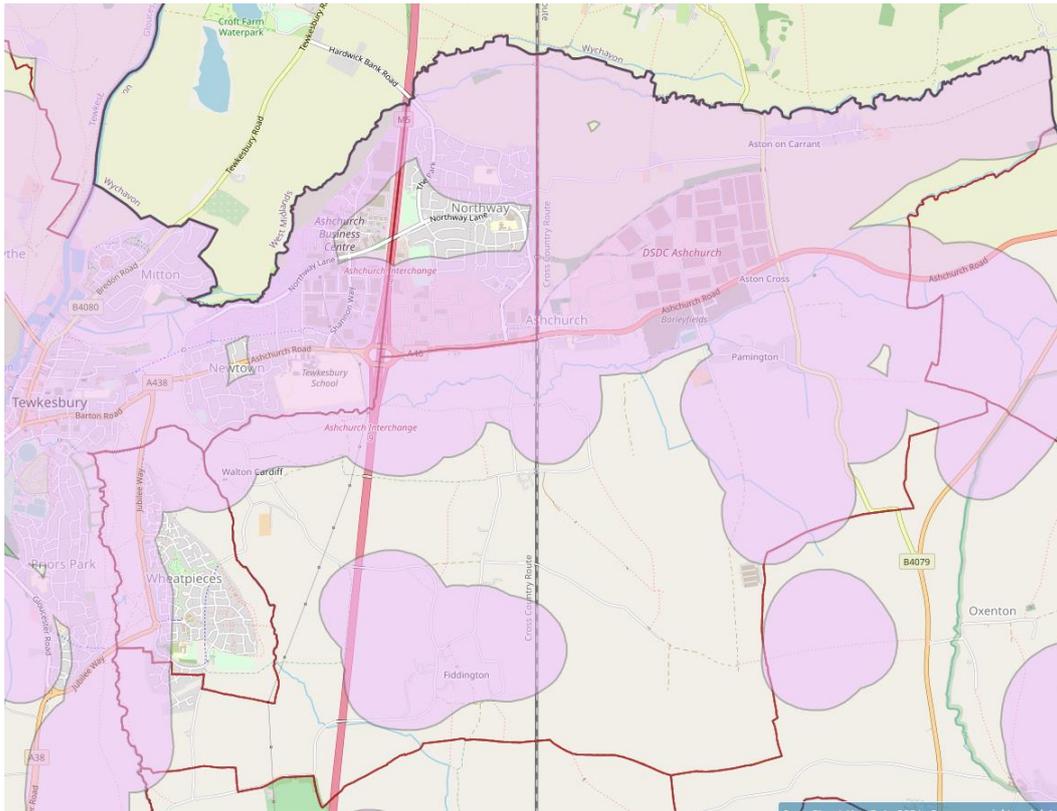
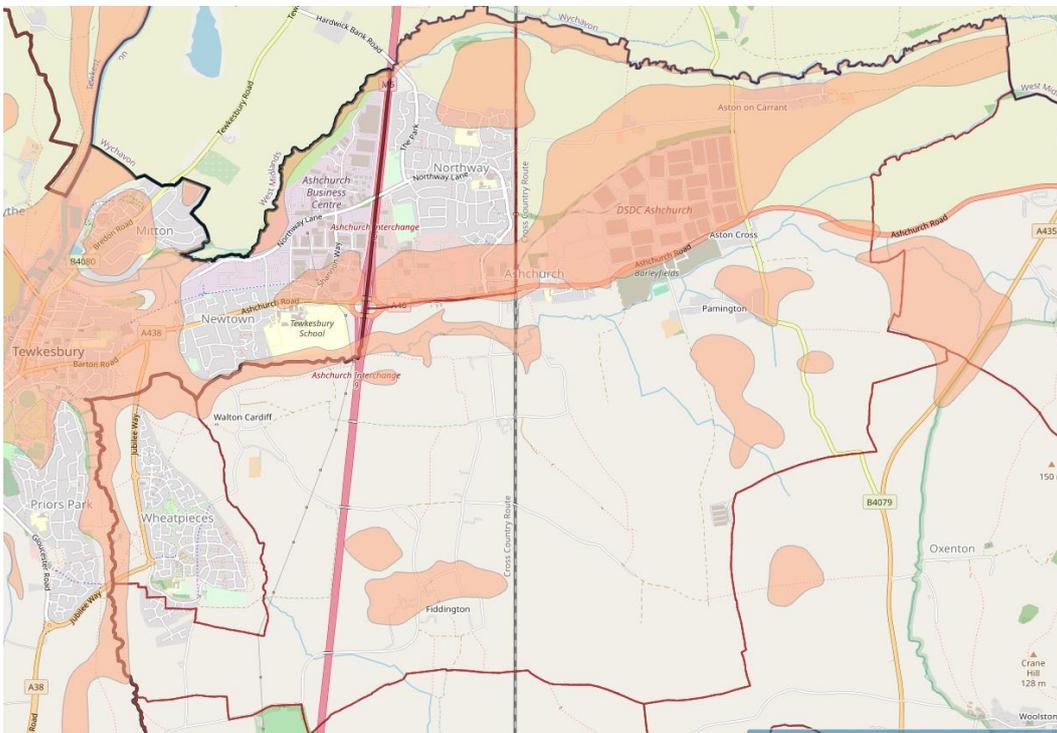


Figure AB.11: MSAs (sand and gravel)



Agricultural land quality

The Agricultural Land Classification (ALC) classifies land into six grades (plus ‘non-agricultural land’ and ‘urban’), where Grades 1 to 3a are recognised as being the ‘best and most versatile’ land and Grades 3b to 5 of poorer quality. In this context,

there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

Recent detailed agricultural land classification has not been undertaken in the Neighbourhood Plan area; as such there is a need to rely on the Provisional Agricultural Land Classification map (which is pre-1988). As highlighted by the Provisional Agricultural Land Classification Map the Plan area is mostly underlain by Grade 3 agricultural land, with a very small area in the north east corner of the Plan area classified as Grade 1. It is uncertain whether the Grade 3 land in the Plan area comprises land classified as the best and most versatile (i.e. Grade 3a land).

Previously developed land

The 2019 Tewkesbury Borough Brownfield Land Register⁷¹ specifies 15 sites that were previously developed sites within the borough as a whole. From a preview of 10 sites, one site 'Ashchurch Rifle Range', falls within the Plan area, which does not have planning permission.

Future baseline

The ecological and chemical water quality of watercourses in the Plan area is sensitive to poorly planned development, including inappropriate waste disposal and sewage systems.

The development of the Garden Town has the potential to lead to the loss of the best and most versatile agricultural land.

Due to the presence of Mineral Resource Areas (MRAs) within the Plan area, there could be potential for effects from future development in relation to mineral deposits, though this would likely be mitigated through consultation with Gloucestershire County Council.

Population and communities

Policy context

Key messages from the National Planning Policy Framework⁷² (NPPF) include that planning policies should:

- Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services.
- Retain and develop accessible local services and community facilities in rural areas.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.

⁷¹ Tewkesbury Borough Council (2019): 'Tewkesbury Brownfield register' [online] available at: <https://digital-land.github.io/dataset/brownfield-land/organisation/local-authority-eng/TEW/>

⁷² MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Ensure that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

National Planning Practice Guidance (NPPG)⁷³ identifies that:

- Local Planning Authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.
- Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning and should be at the heart of the plan making process.
- A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviors and supports reductions in health inequalities. It should enhance the physical and mental health of the community.
- Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.

The Select Committee on Public Service and Demographic Change report *Ready for Ageing?* (2013)⁷⁴ warns that society is underprepared for the ageing population. The report says that "*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises*". The report says that the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.

The following policies of the TBLP directly relate to the Population and Communities theme:

Policy COM1 Protecting Community Assets: "Proposals that would lead to the loss of existing community assets will only be permitted where there is no demonstrable current or future need or demand for the asset, either in its current use or any alternative community use, and the loss would not result in a shortfall of this type of provision, and all reasonable efforts have been made to maintain the asset

⁷³ Department for Communities and Local Government (2012) National Planning Practice Guidance ^[online] available at: <http://planningguidance.communities.gov.uk/>

⁷⁴ Select Committee on Public Service and Demographic Change (2013) *Ready for Ageing?* [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

but it has been demonstrated that it would not be viable, feasible or practicable to retain the asset for its existing use”.

Policy COM2 Broadband Provision: “New development of residential and commercial properties should be provided with infrastructure necessary to enable access to high quality broadband. Developers will be required to engage with infrastructure providers at an early stage in order to facilitate this”.

Policy RCN1 Public Outdoor Space, Sports Pitch and Sports Facility Provision: “Proposals for new residential development shall provide appropriate public outdoor space, sports pitches and built sports facilities to meet the needs of local communities”.

Baseline information

Current baseline

Table AB.2 presents the approximate change in population between the period of 2011 – mid 2019 (estimate). The population of Ashchurch grew by 21.8%, far greater than comparative figures for Tewkesbury, the South West and England as a whole.

Table AB.2: Usual resident population

Population	Ashchurch Rural	Tewkesbury	South West	England
2011	957	81,943	5,288,935	53,012,456
Mid year population estimate (2019)	1,166	92,599	5,599,735	55,977,178
<i>Population change</i>	<i>+21.8%</i>	<i>+13.0%</i>	<i>+5.8%</i>	<i>+5.6%</i>

Source: Census 2011/2019 (UK GOV)

Figure AB.12 shows the proportion of residents that fall into different age categories within Ashchurch Rural parish (as per the 2011 census). The largest proportion of the population fall within the 25-44 age group. Approximately one fifth of the population are aged over 60.

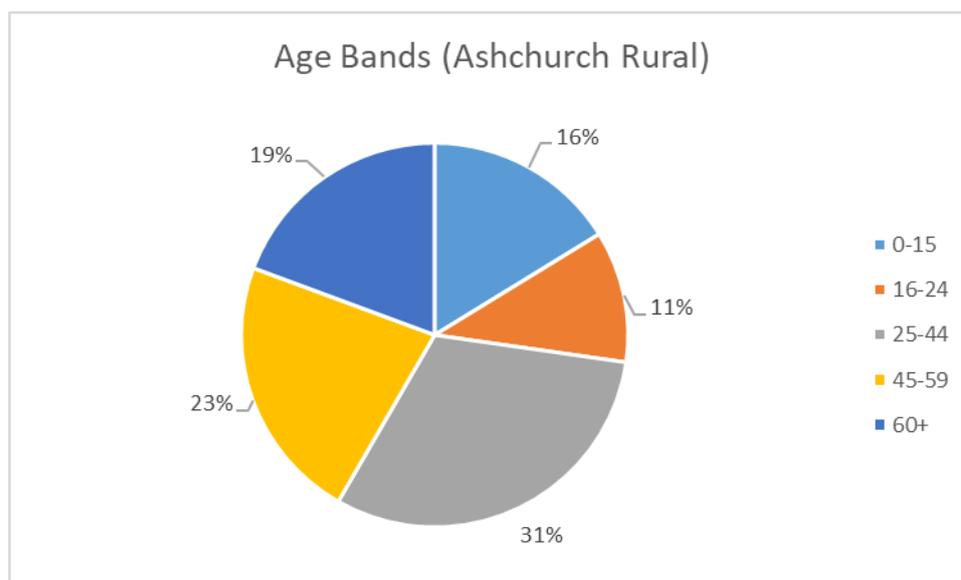
Figure AB.12 Age Bands for Ashchurch Rural (2011)

Table AB.3 shows the proportion of residents that fall into different age categories within the Plan area, district, region and country as a whole. In comparison to the populations of Tewkesbury, the South West and England as a whole, a larger proportion of residents fall within the 25-44 age group. Additionally, the proportion of residents under the age of 16 is smaller than comparative statistics for the borough, region and England as a whole. Similarly, the proportion of residents over the age of 60 in the Plan area is smaller than comparative figures for Tewkesbury, the South West and England as a whole.

Table AB.3: Age structure

	Ashchurch Rural	Tewkesbury	South West	England
0-15	16.2%	17.8%	17.6%	18.9%
16-24	11.1%	9.3%	11.3%	11.9%
25-44	31.3%	24.4%	24.6%	27.5%
45-59	22.4%	21.4%	20.1%	19.4%
60+	19.3%	27.1%	26.4%	22.3%
Total population	957	81943	5288935	53,012,456

Source: Census 2011 (UK GOV)

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long-term health problem.

- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on census information presented in **Table AB.4**, total deprivation within the Plan area is comparatively lower than deprivation levels in the borough, region and England as a whole. Of those households which are deprived, the majority are deprived in one dimension (32.4%).

Table AB.4: Household Deprivation (2011)

	Ashchurch Rural	Tewkesbury	South West	England
Household not deprived in any dimension	56.0%	50.1%	44.8%	42.5%
Deprived in 1 dimension	32.4%	32.0%	33.2%	32.7%
Deprived in 2 dimensions	10.0%	15.0%	17.6%	19.1%
Deprived in 3 dimensions	1.5%	2.6%	4.0%	5.1%
Deprived in 4 dimensions	0.0%	0.3%	0.4%	0.5%
Total deprivation	44.0%	49.9%	55.2%	57.4%

Source: Census 2011 (UK GOV)

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - 'Geographical Barriers': relating to the physical proximity of local services
 - 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - 'Indoors Living Environment' measures the quality of housing.

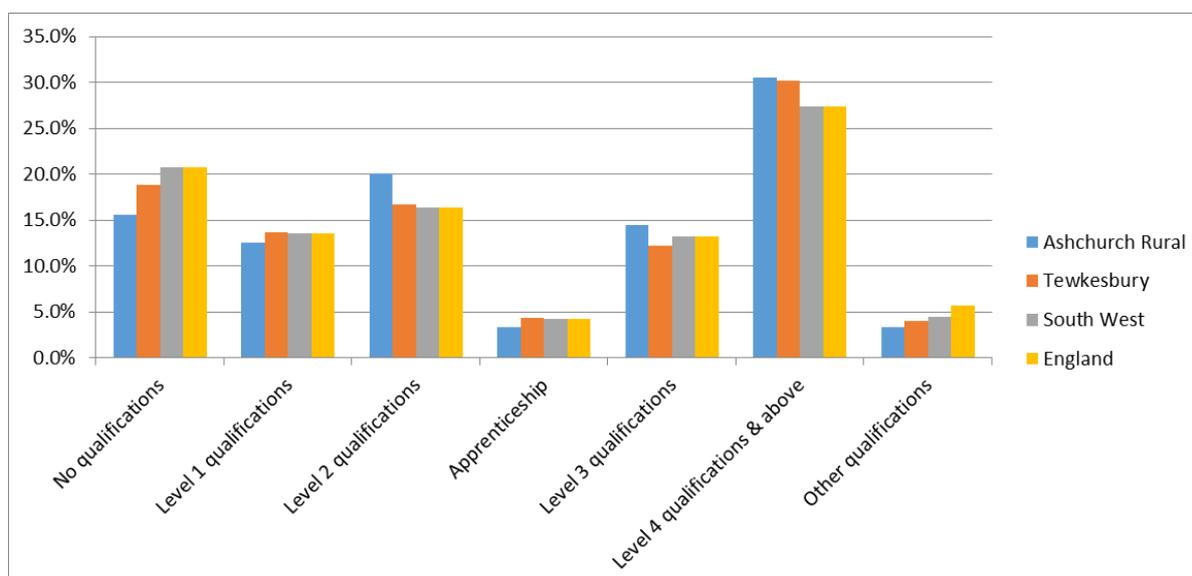
- 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 - **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
 - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

In this respect, the Neighbourhood Plan area falls within the Tewkesbury 001F, which is amongst the 30% least deprived areas in the country.

Figure AB.13 shows the highest level of qualifications for usual residents in the Plan area (as per the 2011 census). Data presented in Figure 8.2 indicates that the population of Ashchurch has a relatively well-educated population, whereby 84.4% of the population have at least one qualification, higher than comparative figures for Tewkesbury (81.2%), the South West (79.3%) and England as a whole (80.6%). In particular, the proportion of residents with Level 4 qualifications and above (30.5%) is higher than figures for Tewkesbury (30.2%), the South West (27.4%) and England as a whole (27.4%).

Figure AB.13: Highest level of qualifications



Source: Census 2011 (UK GOV)

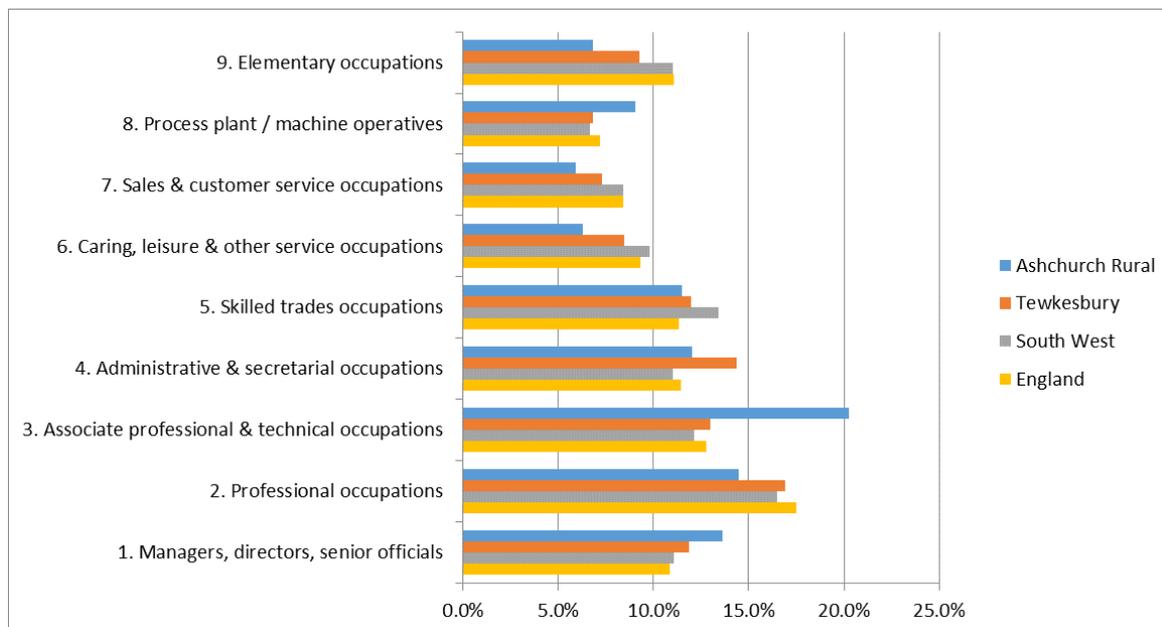
As per **Figure AB.14** (overleaf), the following three occupation categories account for the greatest proportion of residents in the Neighbourhood Plan area:

- Associate professional & technical occupations (20.2%);

- Professional occupations (14.5%); and
- Managers, directors, senior officials (13.6%)

These categories describe approximately 48.3% of usual residents' occupations, higher than comparative totals for Tewkesbury (41.8%), the South West (39.7%) and England as a whole (41.1%). Usual resident occupations are presented in Figure 8.3 (below).

Figure AB.14: Usual Resident Occupation (2011)



Source: Census 2011 (UK GOV)

Community assets and infrastructure

In general, local services within the Plan area are limited. The settlement of Ashchurch provides a primary school and community hall as well as a 24-hour garage (with shop) and Starbucks café. It has been noted in the draft plan⁷⁵ that, due to a lack of key services, “residents are being forced to travel out of the Parish for employment, essential shopping and health services, which is increasing pressure on the A46 corridor.”

Resulting from the lack of community facilities such as a village shop or public house, Ashchurch Primary School is currently used as a community hub and meeting place for local residents' group events.

Additionally, Ashchurch is part of the Rural Services Network⁷⁶, a special interest group which represents a number of local authorities to “ensur(e) that people in rural areas have a strong voice (..) and maintain their social and economic viability for the benefit of the nation as a whole.”

With regards to Green Open Spaces, there is one play park within Ashchurch, but other green spaces for children extend to the Church grounds, garden spaces, informal play areas and Pamington football pitch. At the time of writing (January 2021), there is currently no formal report identifying these spaces.

⁷⁵ Ibid.

⁷⁶ Rural Services Network (n.d.): ‘Revitalising rural’ [online] available at: <https://www.rsnonline.org.uk/>

Future baseline

Though the older population of Ashchurch is comparatively lower than figures for Tewkesbury, the South West and England as a whole, as the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community in the Neighbourhood Plan area, whilst also placing additional pressures on existing services and facilities.

The lack of availability of local services for residents is likely to create an even greater dependency on travelling beyond the Neighbourhood Plan area to access facilities as the population continues to increase at a rapid rate. This could put strain on local transport routes and negatively affect the local economy of Ashchurch. However, it should be noted that growth expected to come through the Garden Town scheme is expected to introduce further services and facilities within the Plan area.

As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices. This is echoed within the place making principles outlined in the UK Government's recent Planning White Paper⁷⁷ which was released in August 2020.

Additionally, the facilitation of high-quality and superfast broadband in rural areas will be required to ensure that everyone has equal opportunities and access to the digital economy. Furthermore, the regeneration of redundant or underutilised brownfield land across the district (including the densification of existing areas) will help to support local employment opportunities and reduce the need to commute to surrounding areas.

Health and wellbeing

Policy context

Key messages from the National Planning Policy Framework⁷⁸ (NPPF) include that planning policies should:

- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.

National Planning Practice Guidance (NPPG)⁷⁹ identifies that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

⁷⁷ MHCLG (2020): 'Planning for the Future – White Paper', [online] available to access via: <https://www.gov.uk/government/consultations/planning-for-the-future/planning-for-the-future>

⁷⁸ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

⁷⁹ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Fair Society, Healthy Lives ('The Marmot Review')⁸⁰ investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*".

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The following policy of the TBLP directly relates to the Health and wellbeing theme:

- **Policy HEA1 Healthy & Active Communities:** "To promote healthy active communities new major development should be designed in accordance with 'Active Design' principles".

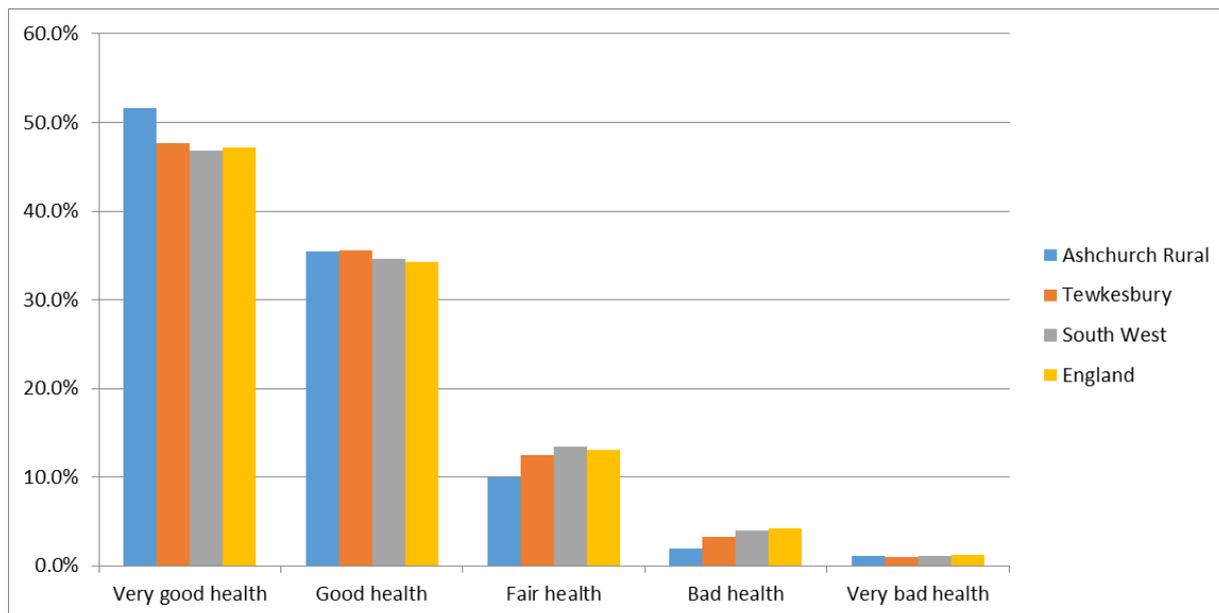
Baseline information

Current Baseline

Figure AB.15 shows the general health of residents in the Plan area. The majority of residents (87.0%) state that their health is at least 'good', higher than comparative figures for Tewkesbury (83.3%), the South West (81.4%) and England as a whole (81.4%). Conversely, a smaller proportion of residents have 'bad' or 'very bad' health (3.0%) when compared to Tewkesbury (4.3%), the South West (5.2%) and England as a whole (5.4%).

⁸⁰ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

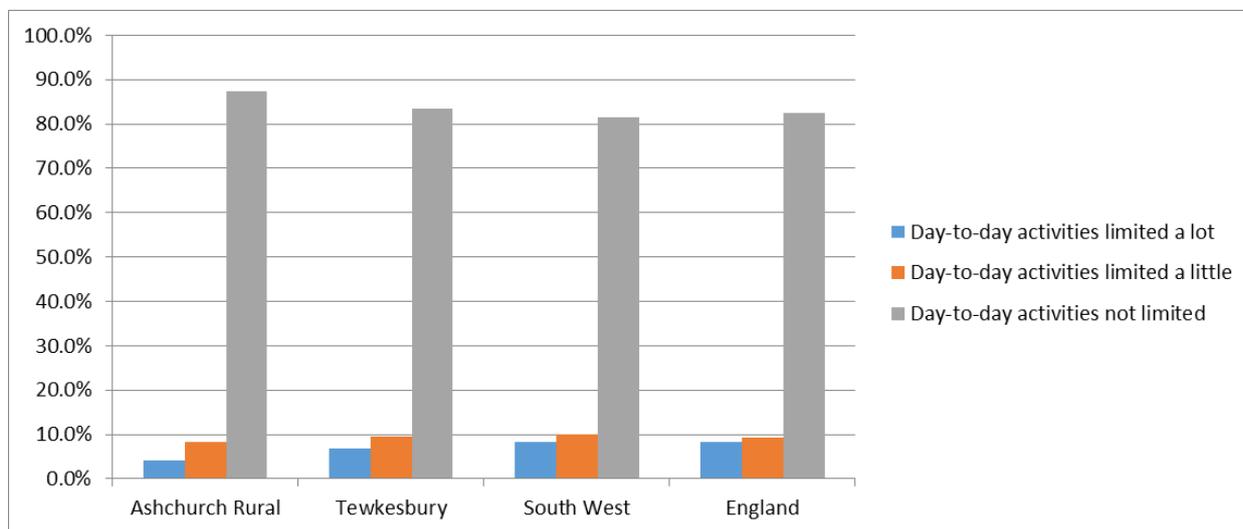
Figure AB.15: General Health



Source: Census 2011 (UK GOV)

As per census data presented in **Figure AB.16** the majority of residents in the Plan area are not limited in their day-to-day activities (87.5%), larger than comparative figures for Tewkesbury (83.5%), the South West (81.6%) and England as a whole (82.4%). Only a very small proportion of residents with disabilities report that their day-to-day activities are limited a lot (4.2%).

Figure AB.16 Long term health category



Source: Census 2011 (UK GOV)

Healthcare provision

There are currently no medical or dental facilities present within the Plan area. Although new medical practices have opened in Tewkesbury (The Devereux Centre, situated approximately 1km west of the parish), the draft plan notes that there are concerns from the doctor’s surgery that the hospital would not be able to meet the demand for additional housing from Ashchurch Rural Parish.

Gloucestershire JSNA

Gloucestershire County Council have produced a summary document⁸¹ for Tewkesbury Borough alongside the JSNA. The following summary points are relevant for the discussion of health and wellbeing in the wider Borough:

- 16.5% of Tewkesbury Borough residents (13,523 people) reported having a long term health problem or disability, broadly in line with the county average and below the regional and national averages.
- Tewkesbury Borough had a higher proportion of disability benefit claimants than Cheltenham and Cotswold, but a lower proportion than the Forest of Dean, Gloucester and Stroud.
- The rate of alcohol related hospital admissions in Tewkesbury Borough has seen a sharp fall since 2011/12. By 2013/14 the rates were below both the county and national benchmarks
- There has been a rise in smoking prevalence rates in Tewkesbury Borough since 2012, but they have remained below the county rate for the past three years and below the national rate for the past four years.
- The proportion of adults who are overweight is higher in Tewkesbury Borough than the Gloucestershire and England benchmarks. The percentage of physically inactive adults in Tewkesbury Borough has also increased since 2013.
- There is a growing evidence base that links loneliness and social isolation with poorer health as well as demonstrating that declining health or the need to provide care to a loved one can lead to greater loneliness.

As discussed below under 'Transport' car ownership in the Plan area is notably higher than comparative figures for Tewkesbury, the South West and England as a whole. 95.6% of households in Ashchurch have at least one car/van, in comparison to Tewkesbury (86.4%), the South West (81.1%) and England as a whole (74.0%). Of those households with cars/vans, the majority have either one or two cars/vans (81.5%).

Green spaces

Facilities and services available to the residents of Ashchurch are limited within the parish boundaries. There is one play park within Ashchurch, but other green spaces for children extend to the Church grounds, garden spaces, informal play areas and Pamington football pitch. It is recognised that green spaces provide a multifunctional role in supporting the health and wellbeing of residents and visitors.

Future baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way.

However, an ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community

⁸¹ Gloucestershire County Council (2015): 'Tewkesbury Summary' [online] available at: https://www.gloucestershire.gov.uk/media/1521548/understanding_tewkesbury_borough-4.pdf

services have the potential to lead to effects on health and wellbeing to key population groups (i.e. the older population).

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

Transport

Policy context

Key messages from the National Planning Policy Framework⁸² (NPPF) include:

- Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - The potential impacts of development on transport networks can be addressed;
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
 - Opportunities to promote walking, cycling and public transport use are identified and pursued;
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
 - Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

National Planning Practice Guidance (NPPG)⁸³ identifies that it is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

The Transport Investment Strategy - Moving Britain Ahead (2017)⁸⁴ sets out the Department for Transport's approach for future investment decisions and priorities. At the local level, the strategy relies on devolved decision-making where local communities have the power and will be backed by funding. Investment aims to achieve a transport network that is reliable, well-managed, safe, and works for

⁸² MHCLG (2019) National Planning Policy Framework [online] available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

⁸³ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

⁸⁴ Department for Transport (2017) Transport Investment Strategy - Moving Britain Ahead [online] available at: <https://www.gov.uk/government/publications/transport-investment-strategy>

everyone. The transport system should also provide smooth, fast and comfortable journeys, and have the right connections in the right places.

The Cycling and Walking Investment Strategy (2016)⁸⁵ sets out the objectives that the DfT are working towards to meet the following walking and cycling ambition for England, *“We want to make cycling and walking the natural choice for shorter journeys, or as part of a longer journey”*

The objectives and target set to measure progress towards the 2040 ambition are to:

- Double cycling, where cycling activity is measured as the estimated total number of bicycle stages made each year, from 0.8 billion stages in 2013 to 1.6 billion stages in 2025;
- Reverse the decline in walking activity;
- Reduce the rate of cyclists killed or seriously injured on England’s roads, measured as the number of fatalities and serious injuries per billion miles cycled, each year; and
- Increase the percentage of children aged 5 to 10 that usually walk to school.

Department for Transport (2020) Decarbonising Transport: Setting the Challenge (2020)⁸⁶ sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050.

In February 2020, the government announced a new £5 billion 5-year funding package to overhaul bus and cycle links for every region outside London.⁸⁷ This builds on the Government’s determination to make buses work better for their passengers. The details of these programmes will be announced in the upcoming National Bus Strategy, to be published later in 2020, and follows the allocation of £170 million to support more electric buses, increase rural mobility and trial new ‘Superbus’ services.

Cycle routes will also see a major boost across the country with over 250 miles of new, high-quality separated cycle routes and safe junctions in towns and cities to be constructed across England, as part of the multibillion pound package announced

The following policies of the TBLP directly relate to the Transport theme:

Policy TRAC1 – Pedestrian Accessibility: “Pedestrian networks will be protected across the Borough and opportunities sought to extend and enhance them. Proposals that reduce pedestrian connectivity, or fail to optimise it, will be resisted”.

Policy TRAC2 – Cycle Network & Infrastructure Cycle: “Infrastructure should be a fundamental consideration in a design-led process for new major development and proposals will be expected to demonstrate this proportionate to the scale of development, including through any Design and Access Statements”.

⁸⁵ Department for Transport (2016) Cycling and Walking Investment Strategy [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512895/cycling-and-walking-investment-strategy.pdf

⁸⁶ Department for Transport (2020) Decarbonising Transport: Setting the Challenge [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf

⁸⁷ Department for Transport (2020) Major boost for bus services as PM outlines new vision for local transport [online] available at: <https://www.gov.uk/government/news/major-boost-for-bus-services-as-pm-outlines-new-vision-for-local-transport>

Policy TRAC3 - Bus Infrastructure: “Proposals for major development should be located, where possible, to provide easy and convenient access to bus facilities and services to maximise sustainable travel by public transport”.

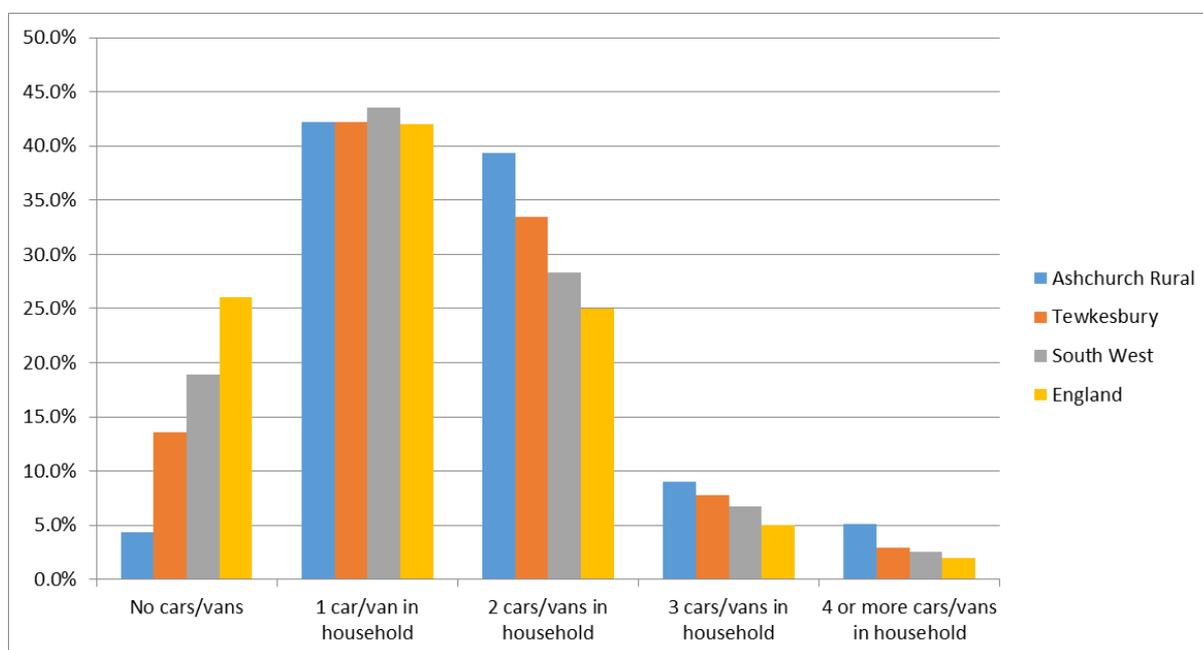
Policy TRAC5 Ashchurch for Tewkesbury Rail Station: “Tewkesbury Borough Council will seek to increase the frequency of train services and the enhancement of facilities at the Ashchurch for Tewkesbury station”.

Policy TRAC6 M5 Junction 9/A46 Corridor: “Tewkesbury Borough Council will support the design and implementation of highway infrastructure improvements along the A46 corridor to Junction 9 of the M5”.

Baseline information

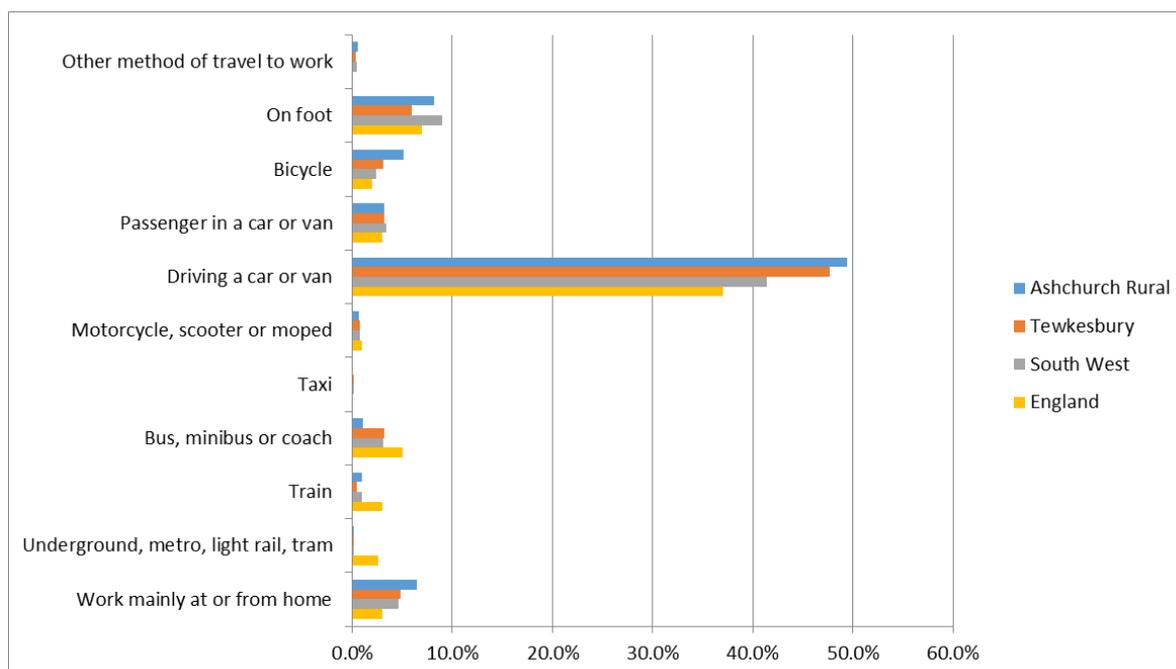
Figure AB.17 shows levels of car ownership in the Plan area. In general, car ownership is comparatively higher than averages for Tewkesbury, the South West and England as a whole.

Figure AB.17: Car ownership



Source: Census 2011 (UK GOV)

Census information presented in **Figure AB.18** (overleaf) indicates that a large proportion of residents travel to work via car or van (49.4%), greater than comparative statistics for Tewkesbury (47.7%), the South West (41.4%) and England as a whole (37.0%). In addition, 6.5% of residents in the Plan area work at or mainly at home, more so than residents in Tewkesbury as a whole (4.9%). Notably, a comparatively larger proportion of residents in Ashchurch travel to work on foot (8.2%) and by bicycle (5.2%) than Tewkesbury (5.9%, and 3.1% respectively).

Figure AB.18 Method of travel to work (2011)

Source: Census 2011 (UK GOV)

Road Network

Located approximately midway between the key urban centres of Bristol and Birmingham, the Tewkesbury area offers excellent access to the national road network via Junction 9 of the M5 motorway and the A46. The high accessibility of the area means that it is well placed to provide connectivity by car for people travelling to and from locations in the wider area such as Cheltenham, Gloucester, Worcester, Birmingham, Bristol and Bath. The M5 corridor in particular provides excellent access and connectivity between the Plan area and strategic urban areas in the West of England (TADCM, 2018)⁸⁸.

Additionally, the Plan area is within the Gloucestershire First Local Enterprise Partnership (GFirstLEP) M5 growth zone, which aims to drive sustainable economic growth whilst improving transport connections, and opening up new sites for employment and housing.

Although conferring considerable local and strategic connectivity benefits by road, both corridors present several major issues for the area and local people, including community severance, challenging walking and cycling conditions and significant congestion impacts for all road users, including bus services (TADCM, 2018)⁸⁹.

The TADCM also notes a number of key road network issues, summarised below:

- M5 J9 – northbound off-slip hard shoulder vehicle queuing and blocking back representing a significant safety concern;
- A46 junctions and accesses through Ashchurch contributing to corridor congestion issues;

⁸⁸ Ibid.

⁸⁹ Ibid.

- Ashchurch Business Park connection to the A46 congestion during the evening peak period;
- A438 Ashchurch Road – congested during peak periods;
- A438 Ashchurch Road / Shannon Way congestion – development related improvements are planned which may include J9 improvements;
- The A46 railway overbridge limits road width to a single lane in either direction; and
- Aston Cross junction – highway capacity constraint by development on all arms with congestion during peak hours.

Gloucestershire Highway Traffic Modelling Study (2020)

Commissioned by Gloucestershire County Council, a road network traffic modelling study⁹⁰ has been progressed separately to develop a short-term access strategy for development sites within the TADCM study area. The results of this study indicated tests that the assumed scale of development could have a significant impact on the highway network as there is insufficient capacity to absorb additional demand. Without additional measures being employed, there would be a significant increase in delays and journey times along all key routes, including the A46 (TADCM, 2020)⁹¹. The prevailing issues of traffic demand, related vehicle delays and the limited road network connections available mean that more substantial and comprehensive road infrastructure improvement is required to support anticipated development.

To inform this report, a separate and high-level assessment of the highway impacts of the masterplan has been undertaken by estimating the scale of trip generation that the masterplan would generate at the local (masterplan area) level. The analysis estimated the number of trips for each development site using trip rates derived from technical work underpinning the JCS and also from the national TRICS trip rate database. Trip distributions and modal splits were taken from Census 2011 data (TADCM, 2018). The principal conclusion indicated that the existing road network offers little in the way of further capacity for additional development.

Rail

The Ashchurch for Tewkesbury railway station is situated on the north western boundary of the Plan area, and provides services northbound to Birmingham New Street and southbound to Cheltenham Spa, Gloucester and Bristol. However, services are relatively infrequent. During the morning and evening peak hours, there are direct services to Birmingham which travel between Cardiff and Nottingham, with one service a day travelling to Stanstead via Leicester.

Bus

Bus services within the Plan area are limited with coverage focussed on Tewkesbury town centre to the west with limited coverage to the east. The Northway residential and employment area is served by two routes, serving Tewkesbury town centre, the rail station and Cheltenham. Ashchurch itself is only served by school bus routes,

⁹⁰ Gloucestershire County Council (2020): 'Highways Modelling Consultation Document' [online] available at: <https://www.gloucestershire.gov.uk/media/2094194/third-party-model-access-protocol-consultation-document.pdf>

⁹¹ Ibid.

with the nearest bus stops for services to Tewkesbury town centre and Cheltenham located at the railway station and on Northway Lane (Draft Plan, 2020)⁹².

More widely, buses provide connections between Cheltenham, Gloucester, Bishop's Cleeve and Evesham. Given this inconsistent coverage, and the variable quality of bus passenger facilities, the travel mode share for Tewkesbury is below the average for Gloucestershire, while bus travel to work within Tewkesbury is lower still (as shown in **Figure 6.2**). Notably, congestion on the A46 is cited by operators as a significant barrier to bus routes operation and coverage (Draft Plan, 2020)⁹³.

Sustainable Transport (Walking and Cycling)

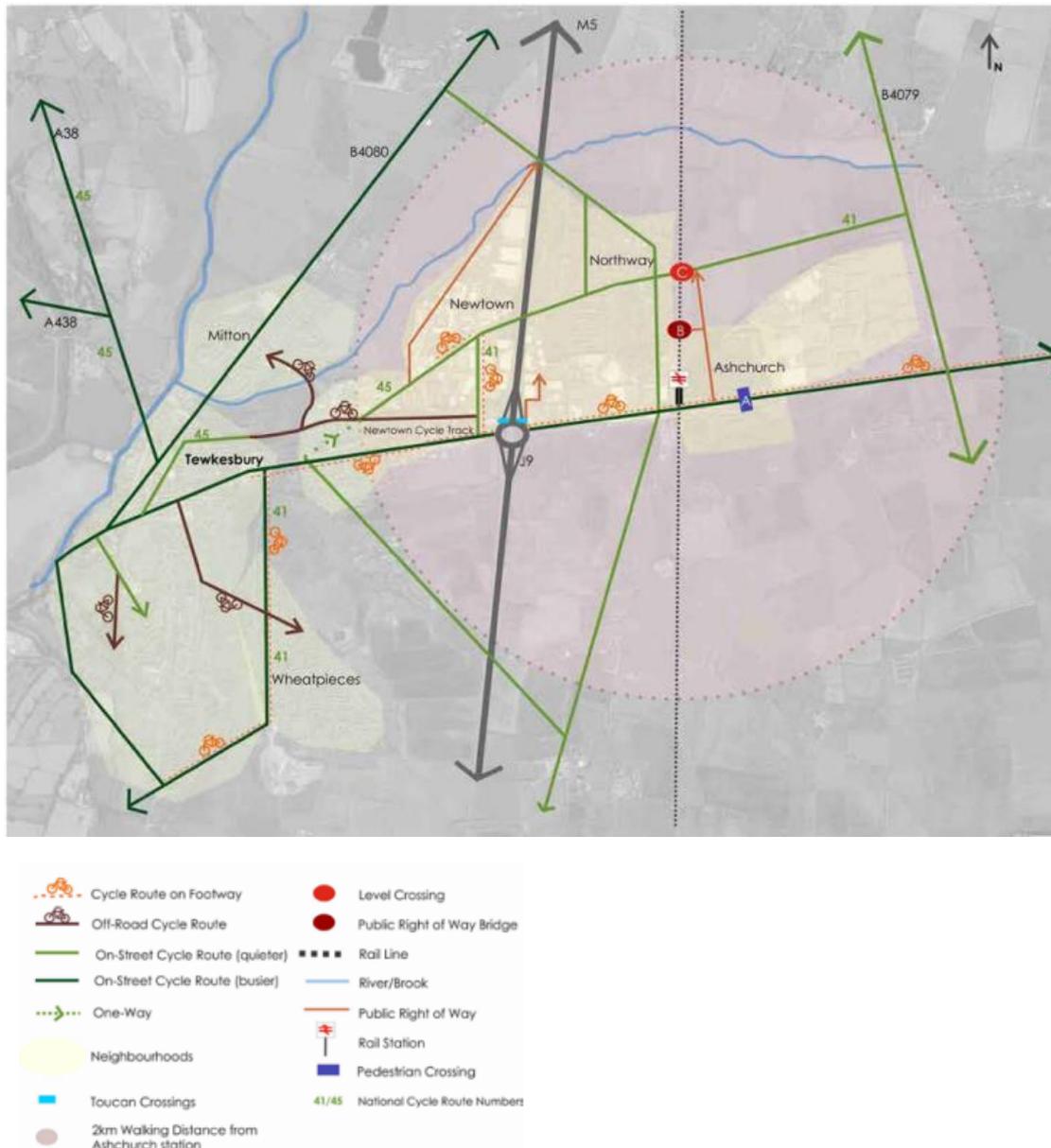
As noted in the TADCM, cyclists benefit from the area's linear form, its generally favourable topography, and quiet links, where motorised vehicle flows are generally low. There has been considerable investment in promoting cycling in recent years as a meaningful local access mode which has seen a very encouraging level of take-up across the area as evidenced by its untypically high travel mode share (see under 'Transport' below).

Subsequently, a number of quiet cycle routes are accessible throughout the majority of the Neighbourhood Plan area, shown in **Figure AB.19**.

⁹² Ibid.

⁹³ Ibid.

Figure AB.19: Cycling Routes in Ashchurch



Source: TADCM, 2018

With regards to Public Rights of Way (PRoWs), there are a number of footpaths and bridleways linking the Northway and Pamington settlements to the more remote areas situated in the south of the Plan area and the larger settlements beyond the west of the boundary (as shown in **Figure AB.20**, overleaf).

However, the key severance axes of the M5, A46 and railway line create a challenge for walkers and cyclists with regards to safe movement across the westernmost boundary to reach services in Tewkesbury.

Figure AB.20: Public Rights of Way (approximate Plan area shown in black)



Source: Bing maps, 2020

Future baseline

With regards to rail services, the strengthening of existing connections with more frequent services would make Ashchurch for Tewkesbury station considerably more appealing to potential rail users and a very considerable contributor to sustainable transport mode shift in support of masterplan delivery.

Traffic and congestion would likely increase significantly with the development of the Garden Town.

Increases in working from home and running a business from home and an increased trend of internet shopping (including in light of trends seen following the Covid-19 pandemic) may have a significant impact travel patterns.

