



**TEWKESBURY BOROUGH PLAN (TBP)  
2011-2031  
Main Modifications**

**SUSTAINABILITY APPRAISAL (SA)**  
(integrating Strategic Environmental Assessment,  
Health Impact Assessment, Equality Impact  
Assessment, Habitats Regulations Assessment)

**SA Addendum Report  
September 2021**

*enfusion* 

# **TEWEKSURY BOROUGH PLAN (TBP)**

## **2011-2031**

### **Main Modifications (MMs)**

## **SUSTAINABILITY APPRAISAL (SA)**

**(integrating Strategic Environmental Assessment, Health Impact Assessment, Equality Impact Assessment, Habitats Regulations Assessment)**

### **SA Addendum Report**

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## 1.0 CONTEXT

### **The Tewkesbury Borough Plan (TBP): Submission & Examination**

- 1.1 Tewkesbury Borough Council is preparing a new Local Plan that will replace the currently adopted Borough Plan (1991-2011). The Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS plan period to 2031 and adopted December 2017<sup>1</sup>) sets out the housing and employment needs for the Tewkesbury Borough area including the strategic direction for development growth with strategic policies (Strategic, Core, Allocation, and Delivery). The Tewkesbury Borough Plan, covering the administrative area of Tewkesbury borough, is part of a hierarchy of planning guidance, sitting underneath the higher-level JCS and national planning guidance.
- 1.2 The new TBP has been developed iteratively since early studies and consultations in 2013, through continuing technical studies, and with wide consultation to consider comments made. The proposed draft TBP was submitted to the Secretary of State for independent examination by a Planning Inspector on 18 May 2020. Hearing sessions were held virtually between 16 February and 18 March 2021.
- 1.3 The Inspector advised in his Post Hearings Main Modifications (MMs) Letter [EXAM50] (16 June 2021)<sup>2</sup> that he considered that the draft TBP could be made sound by a series of Main Modifications. The Inspector also confirmed that the proposed MMs should be subject to further Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) as necessary; these addendum reports should be published as part of the MM consultation. The MMs will be subject to public consultation and the Inspector's final conclusions will be reached taking any representations, including on the SA and HRA, into account.
- 1.4 The Council is also proposing Additional Modifications (AMs). These are not subject to the formal examination process and generally address minor issues of clarity. They will only be considered by the Council and not by the Planning Inspectorate as they do not relate to the soundness of the plan. These AMs are therefore not considered to be significant with regard to the findings of the SA and HRA and are not considered any further in this addendum report.

### **Sustainability Appraisal & Habitats Regulations Assessment**

- 1.5 The emerging elements of the draft Tewkesbury Borough Plan have been tested through Sustainability Appraisal (SA), integrating requirements for Strategic Environmental Assessment (SEA), Health & Equality Impact

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<sup>1</sup> <https://jointcorestrategy.org/>

<sup>2</sup> <https://www.tewkesbury.gov.uk/tewkesbury-borough-plan-examination-library#examination-documents>

Assessment (EqIA), and Habitats Regulations Assessment (HRA). Each draft of the TBP has been accompanied by SA and HRA Reports through consultation stages of plan-making. Representations to the SA and HRA reports have been taken into consideration in the following iteration of assessments.

- 1.6 The SA and HRA studies have been undertaken by independent specialists, Enfusion Ltd. The SA/SEA [CD006] and HRA [CD007] reports<sup>3</sup> were submitted as evidence supporting the Local Plan. The SA/SEA and HRA reports were discussed during the hearing session on 16 February 2021.
- 1.7 Representations to the hearing sessions were provided by agents acting for developers/land owners and raised SA/SEA issues associated with alternative levels of growth at settlements, selection of site options, and the landscape evidence/SA findings for certain site options. Discussion of these issues informed the development of the proposed MMs for the TBP.
- 1.8 The Inspector has not raised any concerns regarding the SA/SEA and HRA. He has advised [EXAM50] that the requirements for SA/SEA and HRA should be met by producing addendum reports as necessary and that these should be subject to consultation with the MMs.

### **Purpose & Methods for the SA & HRA Addendum Report**

- 1.9 This SA Addendum constitutes part of the SA/SEA Report submitted [CD006] - for the purposes of demonstrating compliance with SA and SEA requirements. It also addresses updating of the HRA [CD007] Report. This Addendum Report only addresses the implications for the assessments with regard to the potential MMs; it does not reconsider any other aspects of the Plan. Thus, the purpose of the SA Addendum is to assess the proposed MMs that are likely to have significant effects and to demonstrate that the requirements for SA, SEA and HRA have been met.
- 1.10 A pragmatic and proportionate approach has been taken to the assessments. The MMs have been screened using professional judgment to assess their likely significance with regard to SA/SEA and HRA. Those MMs that were considered to be significant have been further assessed using the same method and SA Framework of Objectives (Table 2.1 CD006) and the implications for the previous findings considered. Any MMs that are relevant to the previous HRA findings have also been considered and the HRA updated within this SA Addendum Report.

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<sup>3</sup> <https://www.tewkesbury.gov.uk/tewkesbury-borough-plan-examination-library#submission-of-the-tewkesbury-borough-plan>

## 2.0 SCREENING THE MAIN MODIFICATIONS (MMs) FOR SA & HRA SIGNIFICANCE

- 2.1 The MMs [EXAM 50] were screened for their significance with regard to SA, SEA and HRA, as set out in the following Table 2.1. It may be noted that some proposed modifications are to provide greater clarity, correct errors, avoid repetition, for consistency, and for updating (for example, with national policy changes), and as such may not be significant for the findings of the assessment processes and are not included in this summary table.

**Table 2.1: Screening the MMs for SA & HRA Significance**

MM No.	TBP Policy/ Paragraph	Summary of Changes	Significant for SA/SEA or HRA?
MM1	RES1 – Housing Site Allocations		
	TEW2	Allocation deleted - planning permission received	Yes
	BIS1	Allocation deleted - planning permission received	Yes
	BIS2	Increase from 35 to 65 dwellings	Yes
	COO1	Amendment from 50 to 95 dwellings	Yes
	COO2	Amendment from 26 to 25 dwellings	No
	GOT1 & 2	Allocation deleted - planning permission received	Yes
	MAI1	Allocation deleted - planning permission received	Yes
	SHU1	Allocation deleted due to concerns over Green Belt impacts	Yes
	FOR1	Allocation deleted due to concerns over historic environment impacts & withdrawal of community support	Yes
MM2	TEW1	Additional policy text requiring locally specific allowances for climate change to be taken into account where appropriate	Yes
	TEW4	Additional policy text re climate change, SFRA Level 2, & requirement for flood resistant/resilient safe access/egress	Yes
	BIS2	Additional policy text re Level 2 SFRA	Yes
	BIS3	Additional policy text re Level 2 SFRA, local climate change, & specific requirement re ecological enhancement of Dean Brook	Yes
	SHU2	Additional policy text re Level 2 SFRA	Yes
MM3	WIN1	Additional policy text expanding/clarifying requirements for pedestrian/cycling route & access to town	Yes

MM4	COO1	Increase from 50 to 95 dwellings. Additional policy text to ' <i>...providing alternative natural greenspace on site</i> '	Yes
MM5 MM6	SHU1 FOR1	Deletion of allocations	See RES1
MM7 MM8 MM9	New paras 3.7(a), 33.2a & b; 3.22	Other built-up areas included within settlement boundaries. Updated sources of housing land supply. Explanation for housing trajectory & overall plan period shortfall; 5 year supply.	No
MM10	RES4	Additional supporting text to clarify re new housing at other rural settlements	No
MM11	RES5	Additional policy criteria requiring proposals to make provision for waste	Yes
MM12	RES7	Additional policy text requiring specific mitigation for any adverse impact on protected species	Yes
MM13	RES11	Additional policy text to avoid significant negative impacts on local ecological networks & priority habitats	Yes
MM14	RES12	Additional supporting text to clarify affordable housing tenure mix	No
MM15	RES13	Additional policy text for clarification	No
MM16	GTTS1	Deletion of The Leigh (8 pitches) & inclusion of Brookside stables (7 pitches)	Yes?
MM17 &MM18	EMP1 & EMP2	Amendments & additional supporting text for clarification regarding employment sites. Deletion of new site allocations at Meteor Business Park, Ashville Business Park (noting - planning permission granted for 3.5 ha extension) & Bamfurlong Industrial Park (noting 5.9 ha planning permission granted on adjacent land); reduction to Malvern View from 15.9 to 2.24 ha; deletion of proposed expansions to Knightsbridge & Isbourne Business Centres & Orchard Industrial Estate.	Yes?
MM19 MM20 MM22	EMP3 EMP4 EMP6	Additional text & clarification	No?
MM21	EMP5	Additional policy text on effective waste management & adapting/mitigating climate change effect; change from 'appropriate' to 'sustainable' transport	Yes
MM23	AGR1	Additional policy wording on biodiversity & ecological networks & requirements re climate change; clarification re water	Yes
MM24	GRB1	Policy deleted and replaced with new policy wording focusing only on Green Belt review at Shurdington; rewording of supporting text for clarification re Ashville Business Park & Bamfurlong Industrial Park – both in green belt.	Yes?
MM25	GRB2	Rewording for clarification	No
MM26	GRB4	New policy requiring clear evidence to be demonstrated of very special circumstances	Yes

		with no development in green belt & to align with NPPF requirements for green belt.	
MM27	RET1	Local retail centres to be provided within JCS strategic allocations A1, A2, A3, A4, A7 – not yet delivered at time of TBP preparation	No
MM28	RET2	Rewording for clarification; additional supporting text for explanation re promoting viability & vitality of Tewkesbury town centre	No
MM29	RET3	Rewording for clarification; new supporting text re proposed local centres in JCS SAs	No
MM30	RET4	Rewording & additional para supporting text for clarification	No
MM31	RET5	Additional policy wording for clarification	No
MM32	RET 6	Additional policy wording for clarification	No
MM33	RET8	Additional policy wording for clarification	No
MM34	DES1	Additional policy wording for clarification	No
MM35	HER3 HER5	Additional test & policy wording with change from 'locally important' to 'non-designated' heritage assets for clarification	No
MM36	LAN2	Rewording of policy to remove ref to Landscape Protection Zone & replace with need to have regard to Landscape Character Assessments; requirement for LVIAs if potential for significant landscape & visual effects. New reasoned justification text for clarification/further explanation.	Yes
MM37	LAN3	Change from 'strategic' to gaps of 'local importance'.	No
MM38	NAT1	Deletion of 'where possible' re restoration & enhancement of biodiversity; additional policy text re loss/deterioration of irreplaceable habitat. New supporting text explaining current situation re net gain & the Defra biodiversity metric, also explanation of landscape scale net gain & the Nature Recovery Network; rewording of supporting text re priority habitats for clarification.	Yes
MM39	NAT3	New policy text on green infrastructure to update standards with the new national design guide	No
MM 40	ENV1	New policy text re development adjacent to STWs should not restrict their operations.	No
MM41	ENV2	Additional policy text re contributing towards provision of additional flood storage & requiring preferred connectivity to mains sewer; new supporting text re capacity of wastewater infrastructure & sustainable drainage systems with wider explanation/clarification/information.	Yes
MM42	ENV3	Additional policy text 'including local ecological networks' for information.	No
MM43	RCN2	Amendment & new wording in supporting text to better explain impacts of lighting from sports facilities on local ecological networks	No



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MM44	COM3	Removal of 'and health' re telecommunications equipment for clarification.	No
MM45 -MM48	Appendix 2, 6 & 7	Updating	No
MM46	Appendix 3	Removal of 2 Local Nature Reserves.	Yes?
	Policies Map	Amended settlement boundary for Minsterworth & new settlement boundary for Ashchurch/MOD site	No

### 3.0 SA OF MAIN MODIFICATIONS (MMs)

- 3.1 **Policy RES1 Housing Site Allocations:** Housing site allocations TEW2, BIS1, GOT1, GOT2 and MAI1 have been removed from this policy as the sites have received planning permissions as of April 2020. This is significant for the SA; it does not change the findings of the SA, but the delivery of such allocated housing confirms the outcomes with positive effects for provision of high-quality housing in the most sustainable places and with the effectiveness of mitigation measures implemented such that there are no significant residual negative effects.
- 3.2 Housing site allocation SHU1 has been deleted due to concerns about impacts on the Green Belt, and housing site allocation FOR1 has been deleted due to concerns about impacts on the historic environment and withdrawal of support from the local community. Whilst the removal of these two housing allocations removes 60 dwellings from the plan supply, the JCS requirements are still met, and a 5-year supply is still demonstrated. This indicates that the major positive effects previously found by the SA for SA No 1 Housing are maintained and still valid.
- 3.3 **Housing Site Allocations TEW1, TEW4, BIS2, BIS3, SHU2:** Additional policy wording for site allocations in Tewkesbury, Bishops Cleeve and Shurdington as requested by the Environment Agency and in order to better address flood risk, including requirements to take into account appropriate locally specific allowances for climate change. Also, proposals at BIS2, BIS3 & SHU 2 should address site specific requirements set out within the Level 2 Strategic Flood Risk Assessment. This strengthening of policy requirements with regard to flood risk and climate change effects will have further positive effects for each site and the plan overall for SA Objective No 9 Flooding. The additional policy wording in BIS3 for provision of biodiversity net gains '*focusing on ecological enhancements to the Dean Brook*' further confirms positive effects for SA No 10 Biodiversity.
- 3.4 **Housing Site Allocation BIS2:** Land at Homelands Farm, Bishops Cleeve – housing capacity increased from 35 to 65 dwellings. The SA had found mostly neutral or minor positive effects for sustainability objectives. Negative effects had been indicated for poor access to public transport options, although this was mitigated to some extent through the site-specific requirements for pedestrian/cycling connectivity with Gotherington Lane and adjacent new development. The increased dwelling capacity may contribute to support for new public transport with positive effects but uncertain at this stage. The increased housing numbers will further confirm the major positive effects found for SA No 1 Housing and contribute to positive effects for SA No 3 Healthy Communities.
- 3.5 **Housing Site Allocation WIN1:** Land off Delavale Road/Orchard Road, Winchcombe with significant additional policy wording requiring an identified opportunity for an additional pedestrian/cycle access point into the wider allocation. This will confirm and strengthen the positive effects previously

found for SA No 3 Healthy Communities, SA No 4 Access to Services/Facilities, and SA No 5 Public/Sustainable Transport.

- 3.6 **Housing Site Allocation COO1:** Land at Junction of A38/A4019, Coombe Hill with additional policy text requiring provision of alternative natural greenspace on site. This provides further mitigation measures against increased recreational pressures on the Coombe Hill SSSI, thus reducing potential negative effects to insignificant. The allocation has been increased from 50 to 95 dwellings in accordance with the findings of a recent appeal. The initial SA (2018) tested this as a site option for 80 dwellings and found mostly neutral or minor positive effects. Site-specific requirements provide policy mitigation to reduce minor negative effects for access and sustainable transport; other policy changes on biodiversity (TBP NAT1 & NAT3) now ensure net gain and provide mitigation measures to ensure minor positive effects.
- 3.7 **Housing Site Allocation SHU1:** Land at corner of Badgeworth Lane & A46 Shurdington. Concern was discussed at the hearings and reported in the Inspector's Letter [EXAM50] that the housing allocation SHU1 would significantly extend housing development along the A46, encroach into the countryside to the south and breach the strong boundary formed by Badgeworth Lane. The SA had found minor negative effects for landscape/Green Belt with SA Objective No 11 for the site option (Appendix VI CD006). These effects were considered to be mitigated through site-specific requirements in the site allocation SA with effects reduced to potentially neutral (table 7.2 CD006) but with uncertainty at that stage. The removal of the site allocation removes any remaining concern or uncertainty regarding impacts on the Green Belt.
- 3.8 **Housing Site Allocation FOR1:** Land at corner of Bishops Walk & School Lane, Forthampton. Concern was discussed at the hearings for impacts on the historic environment and it became apparent that community support is not clear now [EXAM50]. The SA had previously identified neutral effects for the historic environment and minor positive effects for SA objective No 3 Healthy Communities, as well as major positive effects for SA No Housing. The removal of this small allocation (10 dwellings) reverts the SA findings to neutral or not applicable for all the SA objectives. Any concern regarding the historic environment is removed. The small, dispersed village does not benefit from a housing allocation but any proposals for the village can be considered under the enabling Policy RES4. As reported above in paragraph 3.2, overall - the TBP still meets with the JCS requirements and major positive effects for SA No 1 Housing are retained and confirmed.
- 3.9 **Policy RES5 New Housing Development:** The revised policy wording includes additional requirements that new housing should '*make provision for delivery of efficient and high-quality household waste collection services that support the implementation of the waste hierarchy*'. The previous submitted SA had noted (paragraph 7.94) there were no additional policies in the draft TBP relating specifically to minerals, waste and soil resources. However, new development will have to comply with the higher-level JCS Policies, and the SA Framework (CD006 Table 2.1 SA No 13) assumed that all new development has the potential to ensure sustainable wastes management. The additional

policy wording in TBP RES5 makes explicit that new housing development must support the waste hierarchy and encourage resource efficiency and waste reduction, thus indicating that sustainable wastes management will be implemented with likely positive effects for SA No 13 Land & Soils – wastes management objectives.

- 3.10 **Policy RES7 Reuse of Rural Buildings for Residential Use & Policy RES11 Change of Use of Agricultural Land to Domestic Garden:** Additional policy wording to ensure no loss or significant adverse impacts to protected species (RES7) and any loss to local ecological networks or priority habitats (RES11). The previous SA had considered that JCS and TBP Policies provided sufficient mitigation to ensure at least neutral effects on biodiversity (CD006 Table 2.1 SA No 10 Biodiversity) and then at least some positive effects through the requirements for biodiversity net gain. The additional policy wording making explicit reference to local networks and habitats will strengthen such mitigation measures.
- 3.11 **Policy GTTS1: Site Allocations for Gypsies & Travellers.** Deletion of The Leigh (8 pitches) & inclusion of Brookside Stables (7 pitches) – the latter site was removed from the plan following the Preferred Options consultation due to concerns over conflict with Green Belt policy, but the Inspector considered that the reasons for excluding it were unconvincing [EXAM50] and that it should be allocated as this will reduce the shortfall of pitches in the Borough area. Land adjacent to Fieldview at The Leigh is no longer suitable or available, given the planning permission for the change of use to extend the existing garage operations on that site. The previous SA of site options had found major negative effects with regard to SA objective Nos 4 & 5 for access to services, facilities and public transport (Appendix VI CD006). Positive effects are maintained for providing space for pitches for gypsies and travellers with an identified need. Mostly neutral effects were found for the other SA objectives, although the location in the Green Belt was noted with likely negative effects, and the site does not contain any best and most versatile agricultural land – with further positive effects.
- 3.12 **Policy EMP1-2 Major Employment Sites:** Deletion of site allocations Meteor, Ashville (planning permission granted for 3.5 ha extension) & Bamfurlong (5.9 ha planning permission granted on adjacent land); reduction to Malvern View, Bishops Cleeve (15.9 ha deleted; 2.24 ha extension allocated on adjacent site). The Inspector has considered that the gap between Ashville/Meteor and Bamfurlong industrial estates makes a major contribution to Green Belt purposes and that availability of employment land in these areas should be retained for employment that needs to be near the airport. Larger scale proposals would have unknown effects on the operation of the airport and its future is a strategic matter that should be considered through the JCS review. The removal of proposed extensions at Rural Business Centres at Knightsbridge, Orchard and Isbourne could reduce the amount of land for small scale employment locally. The reduction of allocation (15.9 to 2.24 hectares) at Malvern View will reduce the amount of employment land in the Bishops Cleeve area with potential reduced positive effects locally for SA No 2 Economy & Employment. However, overall, the implementation of the TBP will provide for the JCS requirement for employment land within the borough

area and the previous positive effects identified by the SA for SA No 2 are maintained and confirmed.

- 3.13 **Policy EMP5 New Employment Development:** The additional policy text on effective waste management and adapting/mitigating climate change effect provides explicit requirements that strengthen policy mitigation measures with positive effects for SA No 13 and SA No 7 – as described above in paragraphs 3.6-3.7. The additional policy wording requiring access where possible from major roads rather than local roads is likely to contribute towards positive effects for SA No 5 Access and SA No 6 Traffic. The policy wording change from 'appropriate' to 'sustainable' transport provides more clarity and helps ensure implementation.
- 3.14 **Policy AGR1 Agricultural Development:** Additional policy wording that there should be '*no unacceptable impact on biodiversity and ecological networks.*' The submitted SA had considered that the JCS Policy SD10 and TBP Policy NAT1 provided sufficient embedded mitigation. However, national requirements and guidance have been amended since July 2019 and TBP Policy NAT1 has been updated to align with new national planning and environmental policy (see later in this section). The explicit wording in TBP AGR1 now ensures that requirements are updated and that there will be no significant adverse effects for SA No 10 Biodiversity.
- 3.15 **Policy GRB1 Green Belt Review:** The new and revised supporting text clearly explains the proposed changes to Green Belt and how they will not harm the purposes of Green Belt, thus, the SA considers that there are no significant negative effects for SA objectives on local landscape and community integrity and identity. There is now less removal of land in the Green Belt, and this will contribute to further positive effects for SA objectives for Green Belt purposes and landscape SA No 11. Overall, the previous SA had found that potential negative effects were mitigated through selection of site allocations and other policy requirements. The approach will further ensure that employment sites are supported in sustainable locations, and this will strengthen the previous findings of the SA for positive effects for SA No 2 Economy & Employment.
- 3.16 **Policy GRB4 Cheltenham-Gloucester Green Belt:** New policy sets out explicitly what development is inappropriate and what is appropriate on land designated as green belt. This guidance provides strong mitigation to ensure that the five purposes of green belt are fulfilled – further strengthening the positive effects previously found for SA objectives on green belt and landscape.
- 3.17 **Policy LAN2 Landscape Character:** The TBP Policy has been updated and rewritten as a result of discussions at the examination hearings. The change to landscape character provides updating, clarity and consistency. The requirement for proposals to be accompanied by a Landscape & Visual Impact Assessment (LVIA) if they have the potential for significant effects provides clear mitigation measures that strengthen the policy and confirm that mitigation will be implemented with regard to SA No 11 Landscapes, thus better ensuring that there will be no significant residual negative effects.

- 3.18 **Policy NAT1 Biodiversity:** The TBP Policy has been updated to include wording on Local Nature Recovery Strategies with supporting text explaining the current situation with Defra, biodiversity net gain and the proposed biodiversity metrics. This updating and further explanation strengthens the SA findings and indicates that overall, there will be positive effects from the implementation of the TBP for SA No 10 Biodiversity – and these effects are likely to be synergistic and cumulative in the longer term.
- 3.19 **Policy ENV2 Flood Risk & Water Management:** The additional wording provides clarification and makes explicit requirements regarding capacity, risk, and updating with regard to guidance on natural flood management and links to biodiversity/green drainage systems such that the policy is strengthened. This confirms the previous SA findings that there will be no significant residual negative effects for SA No 8 Water & No 9 Flood Risk. The strengthening of mitigation measures will help reduce flood risk and climate change effects with consequential enhancements for human health; the linkages with ecological systems will also contribute to human health and positive effects for biodiversity.
- 3.20 **Minsterworth & Ashchurch/MOD Site – Settlement Boundaries:** The Policies Map shows an amended settlement boundary for Minsterworth (Map 26), including additional open countryside within the boundary. A new settlement boundary is presented for the Ashchurch/MOD Site (Map 32). The previous SA tested proposed settlement boundaries in detail (summary findings in paras 6.5-6.9 CD006). Overall, the SA had found that boundaries are likely to have positive effects on the settlements through managing the location of development to prevent urban sprawl, ensure significant constraints are avoided, and that local communities can benefit from development. It is considered that the amendments to Maps 26 & 32 are refinements that support these findings, and no significant negative effects are indicated.
- 3.21 **Appendix 3 Local Nature Conservation Sites:** The removal of 2 Local Nature Reserves – Gloucestershire Wildlife Trust small osier bed adjacent to the River Severn (breeding birds and unimproved grassland) and Mythe disused railway (supporting unusual plants) from the listing of locally important conservation sites within the TBP area could have implications for the mitigation measures embedded within plan policy. However, TBP NAT1 (Biodiversity) has been updated (see above) and information on the local reserves is provided through the Gloucestershire Wildlife Trust website such that mitigation is still provided through TBP and JCS Policies such that biodiversity net gain will be implemented and indicating likely positive effects for SA No 10 Biodiversity.

### **Habitats Regulations Assessment**

- 3.22 Natural England and the Inspector advised at the hearings that they had no issues with the HRA and agreed with its conclusions that there would be no adverse effects on the integrity of protected sites. The Inspector did not raise any issues for the HRA in his post-hearings letter [EXAM50]. The SA has screened the MMs for significance and the changes to site allocations will not have any significant effects for the designated sites. Therefore, the previous findings of the HRA/AA remain relevant and valid - the Tewkesbury Borough Plan will not have adverse effects on the integrity of protected sites, alone or in combination.

## 4.0 SUMMARY & NEXT STEPS

- 4.1 The proposed draft Tewkesbury Borough Plan was submitted to the Secretary of State for independent examination on 18 May 2020. Hearing sessions were held virtually between 16 February and 17 March 2021. The Inspector advised in his Post Hearings Letter [EXAM50] (June 2021) that he considered the TBP to be a plan that could be found sound subject to Main Modifications (MMs). The Council prepared draft MMs and submitted these to the Inspector for comment during July 2021.
- 4.2 The implications of the MMs on the findings of the previous SA/SEA and HRA/AA have been investigated. The MMs were screened for their significance with regard to the assessment processes. It was noted that many amendments are for updating and to provide further clarity and as such are not significant for SA and HRA.
- 4.3 Those MMs identified as potentially significant for SA/SEA and HRA/AA were then considered using the same methods and assessors as for the submitted SA and HRA Reports. Many of the MMs were refinements that strengthened policies through making certain requirements explicit, for example, it is now clear that net gain applies to all biodiversity and that local ecological networks should also be considered. Further updating of JCS Policies will address climate change – and at the strategic level where interactions and interrelationships may be more meaningfully considered.
- 4.4 Several housing site allocations have been removed as the sites have now received planning permission. Such implementation will confirm the positive effects identified by the SA for housing, community, and health objectives. Two housing sites in the Green Belt have been deleted and their removal provides mitigation to reduce any adverse effects on Green Belt purposes. One site allocation has been increased in capacity from 35-65 dwellings and another from 50-95 – with increased positive effects for housing and community objectives – overall, the major positive effects for meeting identified housing need are thus maintained. It is considered that mitigation measures through policy requirements remain sufficient to ensure no significant residual adverse effects. Certain employment allocations have been deleted since it was determined that the future of the Gloucestershire airport should be considered through the JCS review; overall, the employment land is still met such that the findings of the SA are still valid.
- 4.5 Overall, the previous findings of the SA/SEA remain relevant and valid. The refinements strengthen the mitigation measures embedded in the policies and thus confirm that there will be no significant negative effects and that positive effects have been optimised. The previous findings of the HRA/AA remain relevant and valid - the TBP will not have adverse effects on the integrity of protected sites, alone or in combination.



- 4.6 The proposed MMs will be subject to public consultation commencing October 2021, including this SA Addendum Report. The Inspector will consider any representations made and then his final report will be published early in 2022. Upon adoption of the modified Plan, an SA Adoption Statement will also be prepared and published, in accordance with regulatory requirements.