



# **GLOUCESTER CITY PLAN**

## **SUSTAINABILITY (INTEGRATED) APPRAISAL**

**(Sustainability Appraisal, Strategic  
Environmental Assessment, Health Impact  
Assessment, Equalities Impact  
Assessment)**

**October 2016**

enfusion



# Gloucester City Council Gloucester City Plan: Draft

## **SUSTAINABILITY (INTEGRATED) APPRAISAL (SA): Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equalities Impact Assessment (EqIA)**

**Habitats Regulations Assessment (HRA) Report is  
available separately**

## **DRAFT Sustainability Appraisal Report October 2016**

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## Non-Technical Summary (NTS)

### **This is the NTS of the Sustainability Report**

1. This is the Non-Technical Summary of the Sustainability (Integrated) Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an Integrated Appraisal for the Draft Gloucester City Plan (GCP). This summary is an integral part of the Sustainability (Integrated) Appraisal Report that accompanies the Draft GCP for public consultation in January 2017. It provides an outline of the SA process and findings, including how the SA has influenced the development of the Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

### **The Gloucester City Plan (GCP)**

2. Gloucester City Council, in partnership with Cheltenham Borough Council and Tewkesbury Borough Council have produced a Joint Core Strategy (JCS) which sets out a strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period to 2031) sets out the housing and employment needs for the Gloucester City area, which includes strategic direction for development growth and strategic policies. The Gloucester City Plan (GCP) covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance.
3. The GCT JCS identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031. At least 14,359 of these dwellings are identified to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS therefore is in the process of identifying strategic allocations / urban extensions around Gloucester to meet the residual need.
4. The GCP will identify the sites to deliver the 7,685 new dwellings. Two of these sites (Land at Winneycroft Lane / Corncroft Lane) are included within the GCT JCS given the strategic scale of development at these sites. As such, these sites have been appraised within the GCT JCS Sustainability Appraisal Addendum Report (2016), and it is not considered necessary to duplicate an assessment of these sites within this SA Report. The GCP, alongside the GCT JCS, will provide the planning policies that will be used to guide and manage development over the plan period to 2031.
5. The Draft GCP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability (Integrated) Appraisal, and consultation with the public, stakeholders and the regulators. The Draft GCP sets out the key challenges for the GCP area with a

proposed Vision for the development until 2031 and suggests Objectives to address key issues and to help deliver the Vision.

6. The Draft GCP comprises of proposed Policies and site allocations, and alongside the GCT JCS, will guide the planning and management of growth and development in the Gloucester City area to accommodate the necessary new housing and jobs whilst protecting important and valued environmental assets such as biodiversity and historic heritage. The Draft GCP invites comments on the proposed site allocations, a call for new sites, and planning policies. Any comments received will be taken into consideration and reported in the subsequent stages of plan-making.

### **Integrated Appraisal: SA, SEA, EqIA and HRA**

7. The purpose of Sustainability (Integrated) Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment<sup>1</sup> (SEA) and Government advises<sup>2</sup> that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
8. Gloucester City Council commissioned independent specialist consultants, Enfusion, to progress the appraisal work in June 2016. For the SA of the GCP, an integrated process has been undertaken that also addresses health and equality issues<sup>3</sup> alongside the requirements of the Habitats Assessment Regulations<sup>4</sup> (HRA) (HRA Report available separately). The findings of the health and habitats assessments have been integrated into the SA. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the GCT Joint Core Strategy.
9. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA<sup>5</sup>. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope, the SA is prepared and includes an SA Framework of objectives for sustainable development in the Gloucester City area, and which forms the basis against which the Draft GCP is assessed.

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<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations, 2004

<sup>2</sup> DCLG, 2012 National Planning Policy Framework and [www.planningguidance.planningportal.gov](http://www.planningguidance.planningportal.gov).

<sup>3</sup> To demonstrate compliance with the Equality Act, 2010

<sup>4</sup> The Conservation of Habitats & Species Regulations, 2010

<sup>5</sup> ODPM A Practical Guide to the SEA Directive 2005

**Sustainability characteristics of the Gloucester City area**

- 10. Gloucester City is characterised by its strong historic heritage, and dockland areas which have been the subject of ongoing regeneration. Much of the central area of Gloucester City forms part of the historic setting, containing many Listed Buildings, Scheduled Monuments and Conservation Areas. The central area is also a designated Area of Archaeological Potential. The City is well connected in terms of road, rail and freight movements, and also with national cycle network connections and promoted walking routes. The City also contains over 500ha of open space and two designated Sites of Special Scientific Interest (SSSIs).
- 11. The majority of housing in Gloucester is semi-detached, and property prices in Gloucester are significantly lower than those in the surrounding local authority areas of Tewkesbury, Cheltenham, Stroud, Cotswold and Forest of Dean. A high percentage of the people of Gloucester City are economically active and the City also experiences a high number of in-commuters. A number of health indicators are identified as worse than the average for England in Gloucester, and these include levels of adult and child obesity, and levels of adult physical activity. The City is also constrained by flood risk, particularly fluvial flood risk as the River Severn channel becomes narrower, and the raising of flood defences, particularly around Westgate, is considered to deliver the most benefit is combating this risk. Without the Gloucester City Plan to guide new development, pressures on important townscape, heritage and biodiversity assets may cause adverse effects. The GCP can also maximise the potential benefits arising from new development, with opportunities for sustainable, well connected development that contributes to improving the experience of the City and the health and wellbeing of its residents, employees and visitors.

**Key Sustainability Issues, Problems and Opportunities**

- 12. The key sustainability issues and opportunities are summarised in the table below:

<b>Key Sustainability Issues and Opportunities</b>
Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.
A large proportion of the City falls within the River Severn floodplain.
Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings.
Certain areas of the City suffer from traffic congestion and poor air quality.
There is a need to encourage a move away from the dependence on the private car.
There is a need to ensure carbon emissions are minimised.
Previously developed land may be subject to contamination.
The City needs to protect areas of public open space and green corridors/networks, and ensure open spaces are accessible to all.

There are areas of the City that experience high unemployment rates.
There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry.
High levels of in-commuting.
Limited early hours / evening economy.
Need to plan for and protect quality employment land and ensure a future supply.
There are older, less attractive employment areas.
Lack of overnight tourist visitors.
Poor retail provision compared to the size of Gloucester's shopper population.
There are opportunities to connect new employment development with key transport infrastructure projects (e.g. the M5 and Blackfriars to support the growth zone identified in the Strategic Economic Plan, and alongside the new bus station.
There is acute housing 'need' in the City.
'Pockets' of acute deprivation exist in some parts of the City.
There is a significant growth in the population predicted, particularly in the young and working age bands.
Growth in the number of households, in particular single person households.
Educational achievement needs improving.
Homelessness
There are inequalities in opportunity across the Plan area.
High levels of obesity in both adults and children.
Adequate protection of cultural heritage.
Localism driving increased local level participation.
Crime and fear of crime.
There are areas of the City that experience high unemployment rates.
There is a national requirement to minimise waste production and the amount of waste sent to landfill.
There is a requirement to maintain and improve the ecological status of the River Basin.

### How has the GCP been assessed?

13. An SA Framework was compiled (based on that used for the GCT Joint Core Strategy to progress a consistency of approach), including SA Objectives that aim to resolve the issues and problems identified for development planning in the GCP area. This SA Framework, together with the baseline information and PP Review has been updated in this SA Report, and comprises the basis for assessment. The updated SA Framework can be found in Table 2.1 of the main SA Report, and a summary of the updated key issues and SA Objectives is presented in Appendix II of the main SA Report.
14. Each developing element of the Draft GCP, including potential site allocations and policies to control proposed development, was subject to SA. Using the SA Framework, the baseline information and professional opinion, the likely effects of the emerging Draft GCP were assessed. The SA considered



positive, negative and cumulative effects according to categories of significance as set out in the following table:

<b>Categories of Significance for SA</b>		
<b>Symbol</b>	<b>Meaning</b>	<b>Sustainability Effect</b>
- -	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect

15. Sustainability (Integrated) Appraisal is informed by the best available information and data. However, data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

**What reasonable alternatives have been considered and addressed?**

16. Through the development of the Draft GCP, alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed the plan-making. Potential reasonable options for site allocations were assessed individually and with consideration of cumulative effects in settlement areas where possible. This Draft GCP invites comments on the proposed site allocations and development management policies. Any comments received will be taken into consideration and reported in the subsequent stages of plan-making. The findings of the SA informed this selection but is not the sole source of information to inform decision-making as part of the plan preparation.
17. The Sustainability (Integrated) Appraisal considered cumulative effects and the inter-relationships between sustainability topics for each site option where possible, and made comments with regard to any significant effects, where possible.

**What are the likely significant effects of the Draft GCP?**

18. Overall, the implementation of the policies presented in the Draft GCP were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from technical studies, the wider evidence base, and comments received from public consultations on draft proposals. The key positive effects are as follows:
- Major long term and cumulative positive effects through meeting the housing needs of the GCP area - will also support economic objectives; good quality housing will have major direct cumulative positive effects on health
  - Ensuring that community facilities and other supporting infrastructure will be provided with both short and long term positive effects
  - Support for the economy and employment – will also have further positive effects for health and wellbeing; the vitality of the city and town centres
  - Long term protection against flood risk from all sources
  - Landscape, biodiversity and historic assets are protected.
  - Significant cumulative positive effects as a result of regeneration, which is heritage led providing a sense of identity and distinctiveness, delivering mixed-use development within the identified housing / regeneration zones.
19. Alongside the positive effects, some minor negative effects were also identified, largely as a result of the overall, cumulative effect of increased housing, employment and associated infrastructure development in the plan area. The key potential negative effects are summarised as follows:
- Noise, air quality reduction, pollution, and congestion, arising from the overall predicted growth in road based traffic
  - Effects on landscape and indirect effects for biodiversity, where local level habitats and linkages disturbed or removed – cumulative in the longer term

**How could negative effects be mitigated?**

20. A key function of the SA and overall Sustainability (Integrated) Appraisal process is to provide advice and recommendations to the development of the plan in order to mitigate identified negative effects and enhance positive effects. At each stage, these recommendations are taken forward into the next stage of the plan making process. The SA includes recommendations to support the plan development stages.
21. Potential negative effects have been mitigated through strong policies that protect the natural environment and promote sustainable and connected communities through requirements for appropriate provision of supporting infrastructure, such as transport. This is supported by policies within the higher-level Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. A strong feature of the JCS is the commitment to Green Infrastructure, recognising the many benefits it can provide, including managing flood risk, enhancing biodiversity, and providing recreational spaces for people. Potential negative

effects on local biodiversity in the Draft GCP will be mitigated through the requirement to conserve and improve biodiversity in new development, wherever possible. The SA Recommendations and Suggestions include:

Recommendation(s):

- Enhanced support for the strategic connectivity of open recreational spaces, in line with the Open Space Strategy.
- Enhanced policy wording that seeks qualitative improvements to existing open spaces, where quantitative contributions are not required
- Clarification around acceptable approaches to preventing Gull roosting, nesting and damage, and the prioritisation of non-lethal solutions

Suggestions:

- Encouragement for early Phase 1 Habitats Surveys on brownfield sites

### **EqlA**

22. The screening assessment has found that the Draft GCP is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required.

### **Consultation**

23. The Draft GCP and its accompanying SA documents are provided for consultation through the Council's website. Comments made and responses to them will be recorded and made available. Thus consultation is a vital ongoing and iterative element of the plan-making and SA processes. The Draft GCP and accompanying SA Report reflect the findings of various technical studies and responses received so far during consultation.
24. The Draft GCP and this accompanying Sustainability Appraisal Report will be available for consultation for a period of approximately 6 weeks beginning in January 2017.

### **Monitoring Proposals**

25. The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication.
26. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Gloucester City Monitoring Report (produced annually) alongside the monitoring framework provided in the GCT JCS is considered sufficient to ensure appropriate monitoring takes place going forward.

## 1.0 Introduction

### Purpose of Sustainability Appraisal and the Sustainability Appraisal Report

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation<sup>6</sup> and paragraph 165 of the National Planning Policy Framework (NPPF). Local Plans must also be subject to Strategic Environmental Assessment<sup>7</sup> (SEA) and Government advises<sup>8</sup> that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail. This (Integrated) SA Report is part of the evidence base for the Draft Gloucester City Plan (GCP) and it accompanies the Draft GCP on public consultation.

### Context

- 1.2 Gloucester City Council, in partnership with Cheltenham Borough Council and Tewkesbury Borough Council have produced a Joint Core Strategy (JCS) which sets out a strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period to 2031) sets out the housing and employment needs for the Gloucester City area, which includes strategic direction for development growth and strategic policies. The Gloucester City Plan (GCP) covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance.
- 1.3 The GCT JCS identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031. At least 14,359 of these dwellings are identified to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS therefore identifies strategic allocations around Gloucester to meet the residual need. Currently strategic allocations in the GCT JCS are located at Innsworth and Twigworth, South Churchdown and North Brockworth. As the GCT JCS progresses through examination and proposed main modifications, more work is being undertaken to address the shortfall in meeting Gloucester's housing needs (with a requirement for a further 3,037 new dwellings). As part of the main modifications to the GCT JCS (Policy SA1), an additional two sites at Winnycroft Lane/Corncroft Lane are proposed. However, it should be noted that these sites are included in the GCT JCS due to the strategic scale of

<sup>6</sup> Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>7</sup> EU Directive 2001/42/EC, and, Environmental Assessment of Plans and Programmes Regulations, 2004

<sup>8</sup> DCLG - National Planning Practice Guidance' 2014, ODPM - 'A Practical Guide to the SEA Directive' 2005, Planning Advisory Service – 'The Principles of Plan Making Chapter 6 - The Role of Sustainability Appraisal' 2013 - DCLG, 2012 National Planning Policy Framework

development at these sites (over 500 new dwellings). They are located within the City boundary and have already been included in the identified urban capacity of 7,685. The sites at Winnycroft Lane/Corncroft Lane therefore will not add to Gloucester's overall supply.

- 1.4 The strategic policies and site allocations within the GCT JCS have been subject to SA. The most up to date GCT JCS SA Report (currently May 2014) can be found at <http://www.gct-jcs.org/SustainabilityAppraisal/> with an emerging SA Addendum Report scheduled to accompany the proposed Main Modifications on consultation in October 2016.
- 1.5 The GCP will allocate the remainder of the identified local sites (excluding the two sites at Winnycroft Lane/Corncroft Lane) which will contribute to meeting the development needs of Gloucester. The GCP will also provide planning policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031.
- 1.6 The GCP has been prepared in accordance with national planning requirements and informed by various technical studies, SA, and consultation with the public, stakeholders and the regulators.
- 1.7 Work began on the GCP in 2011 when the City Plan Scope was consulted on in October. Over March/April 2012 further consultation on the City Plan Part 1 was undertaken, which set the context for City Plan, established the main challenges, developed a strategy for development and the key development principles from which planning policy would evolve. This was accompanied by a Sustainability Appraisal Statement which assessed the potential effects of the Key Development Principles against a number of SA Objectives.
- 1.8 Over a period of nine weeks between May and July 2013 further consultation was undertaken on the City Plan Part 2 which sought views on potential development sites, as well as a draft vision and strategy for the City Centre. This was accompanied by a Sustainability Appraisal undertaken by Gloucester City Council which signposted relevant Scoping evidence, identified an appraisal methodology and reported initial findings (by ward). The SA documents that have accompanied the GCP stages on consultation form part of the ongoing SA process. The Council commissioned independent specialist consultants, Enfusion, to review and progress this SA work in June 2016.
- 1.9 The fully drafted GCP comprises 5 chapters which identify a vision and principles to help deliver the vision, 69 development management policies on the topics of housing, employment, retail and City/Town Centres, health and wellbeing, historic environment, natural environment, design, sustainable transport, and infrastructure, as well as proposed site allocations and proposed monitoring.

## **Integrated Appraisal (IA): Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), and Habitat Regulations Assessment (HRA)**

- 1.10 For the review and progression of the SA of the GCP, an integrated process has been undertaken that includes the requirements for Sustainability Appraisal as set out in national planning guidance<sup>9</sup>, and to meet with the requirements of the EU SEA Directive as implemented in UK legislation through the SEA Regulations 2004<sup>10</sup>. For development planning documents in England, SA should address socio-economic factors to the same level of detail as environmental factors and as required by the SEA Regulations.
- 1.11 This SA also addressed health and equality issues<sup>11</sup> alongside the requirements of the Habitats Directive<sup>12</sup> as implemented into UK legislation through the Habitats Regulations<sup>13</sup>. The findings of the health/equality and habitats assessments have been integrated into the SA. The Equality Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA) reports are also provided separately as they are subject to different legislation and guidance. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the appraisal of the higher level plan (the GCT JCS).
- 1.12 Sustainability Appraisal is an iterative and ongoing process that informs plan-making by assessing developing elements of the Plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA<sup>14</sup>. Initially the scope of the SA is determined by establishing the baseline conditions and context of the draft plan by considering other relevant plans and objectives, and by identifying issues, problems and opportunities for the area. From this scope the SA is prepared and includes an SA Framework of objectives for sustainable development in the plan area and which forms the basis against which the draft plan is assessed.
- 1.13 An integrated approach to appraisal and assessment brings resource efficiencies and allows complementary issues to be considered concurrently. The Government's extant guidance recognises value in undertaking Habitats Regulations Assessment (HRA) and SA concurrently (although the findings and reporting of the two processes should be kept distinct)<sup>15</sup>. In practice, the evidence base for both processes can be shared with HRA findings and conclusions supporting the SA/SEA.

<sup>9</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

<sup>10</sup> <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

<sup>11</sup> To demonstrate compliance with the Equality Act, 2010

<sup>12</sup> EU Directive 1992/43/EEC (and see also NPPF paragraphs 14 & 117)

<sup>13</sup> The conservation of Habitats & Species Regulations, 2010

<sup>14</sup> ODPM A Practical Guide to the SEA Directive 2005

<sup>15</sup> Planning for the Protection of European Sites: Appropriate Assessment: Guidance for Regional Spatial Strategies and Local Development Documents (DCLG, August 2006)



## **Habitats Regulations Assessment (HRA)**

- 1.14 The Conservation of Habitats and Species Regulations (amendment) (2011) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.
- 1.15 The HRA screening (and any more detailed Appropriate Assessment) considers if the potential impacts arising as a result of the Gloucester City Plan (GCP) are likely to have significant effect on these sites either alone or in combination with other plans and projects. The methods and findings of the HRA process is set out in a separate HRA Report that will be sent to the statutory consultee (Natural England) and placed on consultation for the wider public. The HRA findings have informed the SA.

## **Equality & Diversity Impact Assessment (EqIA)**

- 1.16 In addition, the Council has chosen to integrate the health and equality impact assessment processes with the overarching Sustainability (Integrated) Appraisal process; this is consistent with the approach taken by the higher level plan – the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Health Impact Assessment is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall SA (Integrated) process. Public bodies have a duty<sup>16</sup> to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity.
- 1.17 For the SA of the GCP, the integration of health and equality concerns has focused on ensuring that these issues are well represented in the SA Framework (through objectives and thresholds of significance) against which the emergent policies and sites are being assessed. Consideration of health and equality issues has been addressed iteratively as the appraisal process has progressed. Details of the EqIA are also presented separately to demonstrate compliance with the Equality Act (2010) as Appendix V to this SA Report.

## **Consultation: Statutory, Public & Stakeholder Engagement**

- 1.18 As part of the early preparation of the GCP, consultation on the emerging elements of the plan and initial SA work was undertaken in 2011, 2012 and 2013. The consultation responses can be found on the Council website here: <http://www.gloucester.gov.uk/resident/planning-and-building-control/planning-policy/Pages/city-plan.aspx>.
- 1.19 This SA Report will accompany the Draft GCP in consultation over the period January-February 2017. It will be subject to consultation with the SEA statutory bodies (Historic England, the Environment Agency, and Natural England),

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<sup>16</sup> Equality Act, 2010

stakeholders and the public. Any comments received on the SA will be taken into consideration and reported in the subsequent stages of plan-making and the SA process. The SA studies and findings continue to inform the ongoing development of the GCP and comprise part of the evidence base for the emerging plan. SA Reports will accompany the subsequent stages of the GCP as set out in the following Table 1.1 with the chronology of the GCP preparation, consultation and the accompanying SA/SEA stages:

**Table 1.1: GCP and SA/SEA Stages and Documents**

<b>GCP Stage and Documents Consultation</b>	<b>SA/SEA Stage and Documents Consultation</b>
<p><b>City Plan Scope</b></p> <p>Consultation 23 May – 23 August 2011.</p>	
<p><b>City Plan Part 1</b> (development strategy and key development principles)</p> <p>Consultation March – April 2012</p>	<p><b>Sustainability Appraisal Statement</b> February 2012 (undertaken by Gloucester City Council)</p> <p>Consultation March – April 2012</p>
<p><b>City Plan Part 2</b> (development site options)</p> <p>Consultation 13 May – 12 July 2013.</p>	<p><b>Sustainability Appraisal Report</b> May 2013 (undertaken by Gloucester City Council)</p> <p>Consultation 13 May – 12 July 2013.</p>
<p><b>Draft Gloucester City Plan</b></p> <p>Consultation January 2017</p>	<p><b>Draft Sustainability Appraisal Report</b> August 2016 (undertaken by Enfusion Ltd)</p> <p>Consultation January 2017</p>

### Summary of Compliance with the SEA Directive & Regulations

- 1.20 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process, as for this integrated appraisal of the Draft GCP), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. The requirements for reporting the SEA process are set out in Appendix I of this SA Report.

### Structure of this Sustainability Report

- 1.21 Section 2 of this SA Report sets out the methods used to appraise emerging elements of the Draft GCP. Section 3 describes the sustainability context for the SA, including the objectives of other relevant plans and programmes, and the baseline characteristics of the area. Section 4 explains how options are considered and assessed in plan-making and how alternatives are considered in SA in order to explicitly demonstrate compliance with the requirements of the SEA Regulations.



- 1.22 Section 5 summarises the overall findings of the SA of the Draft GCP. The detailed sustainability appraisals of potential site allocations are provided in Appendix IV. Appendix V details the findings of the EqIA and provides a separate document to demonstrate compliance for the Council with the requirements of the Equality Act, 2010. The Habitats Regulations Assessment Report accompanies the Draft GCP and the findings are summarised and have been taken into consideration in this SA Report.
- 1.23 The SEA Directive and Regulations requires that the Report should include a description of the measures envisaged concerning monitoring and such proposals are set out in section 6. A summary of the findings of the SA is provided in section 7, together with the next steps for the plan and the SA. In accordance with the SEA Directive, a Non-Technical Summary is also provided – at the beginning of this SA Report and also available separately. Appendix I provides signposting to explain how this SA complies with the requirements of the SEA Directive – and as required by the Directive.

## 2.0 Sustainability Appraisal Methods

### Introduction

- 2.1 Sustainability (Integrated) Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback from consultation. There is a tiering of appraisal/assessment processes (and see also later Figure 4.1) that align with the hierarchy of plans – from international, national and through to local.
- 2.2 This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that “Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.” The Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS) is a strategic planning document that provides strategic policy and allocations to guide promoters, communities and the three Councils in their decisions regarding proposed development. The Gloucester City Plan (GCP) is a lower level planning document that is in conformity with the GCT JCS and national planning requirements. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the Plan area.
- 2.3 This SA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive, the findings from the Habitats Regulations Assessment (HRA), and the findings of the Equality and Diversity Impact Assessment (EqIA). Since the HRA and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are also provided separately to clearly demonstrate compliance.

### Scoping and the SA Framework

- 2.4 Initial SA work undertaken by Gloucester City Council built upon existing work already undertaken as part of the SA prepared for the previous development plan process and the emerging GCT JCS. In June 2016 (and still at the early stages of the Draft GCP preparation) independent specialist consultants at Enfusion Ltd were commissioned by the Council to review and update the SA. Relevant plans and programmes (PP) were reviewed and baseline information was updated and analysed to ensure that key issues, problems and opportunities for the area are identified. The details of this analysis are presented in section 3 of this SA Report.
- 2.5 The existing framework of SA Objectives has been reviewed and updated to ensure that all key issues and opportunities identified in the baseline and PP updates are considered. The review of the SA Objectives can be found in Appendix II. This framework, which now includes detailed thresholds of significance for appraisal of site options, aims to promote and/or protect

sustainability factors that are relevant to Gloucester City and its timescale for implementation (in the period up to 2031). It forms the basis against which emerging elements of the GCP are appraised using both quantitative and qualitative assessment respectively from the evidence base and professional judgement. The final SA Framework of Objectives and thresholds of significance is set out in the following Table 2.1 (*including cross-references in italics for the topics in the SEA Directive and key requirements in the NPPF*):

**Table 2.1: SA Framework**

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.</li> </ul>	<p>1. Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest</p> <p>Relevant JCS SA Objective: 1</p>	<p>The nature and significance of effects against SA Objective 1 primarily relate to the potential effects on <b>designated biodiversity</b>.</p>	++	<p>Development at the site option will deliver biodiversity gains, or improve ecological corridors / connections to strategic GI, or development will address a significant existing sustainability issue relating to biodiversity.</p>
		<p>Is the site within, adjacent to, or in close proximity (200m) to any nationally designated biodiversity (SSSIs)?</p>	+	<p>Development will not lead to the loss of an important habitat, species, trees and hedgerows or lead to fragmentation of ecological corridors and there are potential opportunities to enhance biodiversity.</p>
		<p>Is the site within, adjacent to, or in close proximity (200m) to any biodiversity sites designated as being of local importance (Local Wildlife Site, Local Nature Reserve, Geological Site)?</p>	0	<p>Development at the site is not likely to have negative effects on any nationally or locally designated biodiversity or contribute towards a severance of green and blue infrastructure or impede the migration of biodiversity. Potential for a neutral effect.</p> <p>or</p> <p>Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation possible, potential for a residual neutral effect.</p>
		<p>It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on</p>	?	<p>Element of uncertainty exists until more detailed lower level</p>

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>There is a need to ensure carbon emissions are minimised</li> </ul>		designated biodiversity that may be some distance away.		surveys and assessments have been carried out.
		The findings of the HRA will also inform the appraisal of site options.	-	Development at the site option has the potential for negative effects on sites designated as being of local importance, or will lead to the loss of important habitats or fragmentation/severance of the connectivity of ecological corridors. or Development at the site has the potential for negative effects on nationally designated sites. Mitigation possible, potential for a minor residual negative effect.
		<p><b>Evidence / Data Source:</b> DEFRA Magic Map and GIS map layers of local biodiversity designations supplied by Gloucester City Council</p>	--	Development at the site has the potential for negative effects on a nationally designated site. Mitigation difficult and / or expensive, potential for a major residual negative effect.
	<p>2. Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources</p> <p>Relevant JCS SA Objective: 2, 6</p>	<p>It is assumed that any potential site option could meet energy efficiency standards, using sustainable construction methods. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 2, and this SA Objective will not be a key differentiator between site options.</p>		
	<p>3. Improve the resilience of people, businesses and the environment to the unavoidable</p>	<p>It is assumed that any potential site option could meet sustainable design and construction standards. Biodiversity and green infrastructure networks are considered against SA Objectives 1 and 19-20. It is therefore assumed that all site options have the potential for minor positive effects against SA</p>		

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>There is a requirement to maintain and improve the ecological status of the River Basin.</li> </ul>	consequences of climate change.  Relevant JCS SA Objective: 3	Objective 3, and this SA Objective will not be a key differentiator between site options.		
	4. Reduce water use and conserve and improve the quality of water bodies in the Plan area  Relevant JCS SA Objective: 5, 6	It is assumed that development at any of the site options can contribute to minimising the demand for and use of water.	++	A major positive effect is not considered possible.
		The nature and significance of the effects against SA Objective 4 will therefore primarily relate to the location of the site option in relation to the <b>Surface Water Safeguard Zone and the potential effects of development on water quality.</b>	+	The site option is not located within a Surface Water Safeguard Zone and will not lead to any negative effects on water quality.
		The SA assumes that development at any of the sites can incorporate aspirational water efficiency measures and that any proposal can make appropriate and timely provision for necessary supporting infrastructure, including waste water treatment.	0	The site option is located within a Surface Water Safeguard Zone, mitigation is available to ensure that there will be no significant negative effects, with the potential for a residual neutral effect.
			?	There is an element of uncertainty until lower level assessments have been completed.
			-	Development at the site option has the potential for negative effects on water quality, mitigation is available, potential for a residual minor negative effect.
			--	Development at the site option has the potential for major negative effects on water quality, mitigation may be

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>A large proportion of the City falls within the River Severn floodplain</li> </ul>		<p>As water quality within the Gloucester Tributaries is largely affected by urban and transport effects, the findings for SA Objective 6 will also influence the judgements made in terms of the nature and significance of the effects against this SA Objective.</p> <p><b>Evidence / Data Source:</b> Environment Agency Drinking Water Safeguard Zones map</p>		<p>expensive / difficult, potential for a residual major negative effect.</p>
	<p>5. Protect floodplain from development likely to exacerbate flooding problems from all sources</p> <p>Relevant JCS SA Objective: 4</p>	<p>The nature and significance of the effects against SA Objective 5 will primarily relate to the location of development in relation to a <b>flood risk area</b> (flooding from all sources).</p> <p>The SA assumes that development at any of the site options has the potential to incorporate Sustainable Drainage systems.</p> <p><b>Evidence / Data Source:</b> Environment Agency Flood Map (Flooding from rivers, the sea, and surface water) supported by GIS map layer from Gloucester City Council</p>	<p>++</p>	<p>The site option is not located within an area of flood risk and there is evidence that development at the site option could offer an opportunity to potentially reduce flood risk.</p>
			<p>+</p>	<p>The site option is not located within an area of flood risk and is not at risk of surface water flooding.</p>
			<p>0</p>	<p>The site option is located partially within an area of flood risk, or at risk of surface water flooding in parts of the site. However, development could avoid this area, or suitable mitigation is available, with the potential for a residual neutral effect.</p>
			<p>?</p>	<p>There is an element of uncertainty until more detailed</p>

Key Issues	SA Objective(s)	Significance Criteria:			
<ul style="list-style-type: none"> <li>■ There is a need to encourage a move away from the dependence on the private motor car</li> <li>■ High levels of in-commuting</li> <li>■ Certain areas suffer from traffic congestion and poor air quality</li> </ul>				lower level surveys and assessments have been carried out.	
			-	The site option is located partially within an area of flood risk, or at risk of surface water flooding in parts of the site. The areas of flood risk would be difficult to avoid, and mitigation is likely to be expensive/ difficult.	
				--	The site option is located wholly within an area of flood risk or at risk of surface water flooding across the entire site.
	<p>6. Reduce the need to travel and maximise the use of sustainable modes of transport</p> <p>Relevant JCS SA Objective: 8</p>	<p>This SA Objective will address two separate issues relating to transport and movement; the first being site access and potential impacts on the highways network, and the second being the accessibility of sustainable modes of transport.</p> <p><b>6a)</b> The nature and significance of the effects against SA Objective 6a will primarily relate to <b>site access and impacts on the highways network</b>.</p> <p>Given existing site assessment work undertaken as part of</p>	++	Development at the site option has the potential to significantly enhance the highways network, which will reduce levels of traffic in an area that is experiencing congestion issues.	
				+	Development at the site option has the potential to enhance the highways network, which will reduce levels of traffic.
			0	The site option is well located in respect of the road network and vehicle movements. Whilst development at the site has the potential to increase traffic, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect.	



Key Issues	SA Objective(s)	Significance Criteria:		
		<p>the SHLAA, the SA assumes that appropriate access can be provided for at any of the site options which have made it to this stage of assessment; however, if any new evidence suggests that access may be a significant issue then this will be noted within the summary appraisal narrative.</p>	?	<p>There is an element of uncertainty, most likely until lower level assessments have been carried out.</p>
		<p>In the absence of detailed traffic modelling of the site options judgements on the nature and significance of the effect against this SA Objective will primarily relate to the capacity of the site. Sites delivering over 100 new dwellings / 1ha of employment land are considered to have the potential for effects of greater significance.</p>	-	<p>Development has the potential to increase traffic in the surrounding road network and the site is not well located in respect of the road network and vehicle movements. Mitigation available, potential for a residual minor negative effect.</p>
		<p><b>Evidence / Data Sources:</b> Officer input, traffic modelling (when available)</p>	--	<p>Development is likely to increase the levels of traffic in an area that is already experiencing congestion issues (particularly within an AQMA), and the site is not well located in respect of the road network and vehicle movements. Mitigation difficult and/or expensive, potential for a residual major negative effect.</p>
		<p><b>6b)</b> The nature and significance of the effects against SA Objective 6b will primarily relate to the</p>	++	<p>The site option is within reasonable walking distance (800m) to all four of the assessed modal choices.</p>
		<p><b>distance of the site from existing sustainable transport</b></p>	+	<p>The site option is within reasonable walking distance</p>

Key Issues	SA Objective(s)	Significance Criteria:		
		<p><b>modes</b> (train, bus, pedestrian and cycling routes).</p>		(800m) to at least a mode of public transport (train or bus) and a free mode of transport (cycle path or PRow)
		<p>The SA assesses access to four different modal choices; train, bus, cycle routes and Public Rights of Way.</p>	0	A neutral effect is not considered possible.
		<p>A reasonable walking distance of 800m has been utilised in the assessment <sup>17</sup>.</p>	?	There is an element of uncertainty, for example the quality of the route is questionable, most likely until lower level assessments have been completed.
		<p>Distances will be measured using a buffer zone of the set reasonable walking distance calculated from the site boundary within ArcGIS. It is recognised however that the distance by buffer zone is not the only aspect to consider in accessibility, and as such the narrative will note if potential barriers to movement, or poor quality infrastructure is likely to restrict the potential use of the mode.</p>	-	The site is not within reasonable walking distance (800m) to three out of four of the assessed modal choices, or the site is not within reasonable walking distance (800m) to a mode of public transport (bus or train).
		<p>The SA assumes that development at any of the site options could potentially provide or contribute to</p>	--	The site is beyond reasonable walking distance (800m) to all four of the assessed modal choices.

<sup>17</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>Previously developed land may be subject to contamination</li> </ul>		improved sustainable modes of transport.  <b>Evidence / Data Source:</b> GIS map layers supplied by Gloucester City Council		
	7. Improve soil quality  Relevant JCS SA Objective: 5	<p>The nature and significance of the effects against SA Objective 7 will primarily relate to whether development at the site could <b>regenerate previously developed land or would result in the loss of greenfield land or best and most versatile agricultural land.</b></p> <p>It is considered that there is an element of uncertainty for all site options until more detailed lower level surveys and assessments have been carried out through planning applications.</p> <p>The appraisal will also note if the site option is located within a mineral safeguarded area with the potential to unnecessarily sterilise mineral resources.</p> <b>Evidence / Data Source:</b>	++	The site is entirely brownfield and will not result in the loss of any greenfield or agricultural land.
			+	The majority of the site is brownfield land and will not result in the loss of best and most versatile agricultural land.
			0	A neutral effect is not considered possible.
			?	An element of uncertainty exists until more detailed lower level surveys and assessment have been carried out.
			-	The majority of the site is greenfield and does not contain any best and most versatile agricultural land.
			--	Development at the site option could result in the loss of best and most versatile agricultural land.

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings</li> </ul>		Defra Magic Map Application and Google Maps		
	8. Protect and enhance landscape character	The nature and significance of the effects against SA Objective 8 will relate to <b>townscape / landscape sensitivity</b> and the potential effects of development on townscape / landscape character.	<b>++</b>	Development significantly enhances the townscape/landscape or removes a significant eyesore and/or would regenerate previously developed land / buildings (PDL) that is currently having a major negative effect on the townscape/ landscape.
	Relevant JCS SA Objective: 5		The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.	<b>+</b>
		It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out through planning applications.		<b>0</b>
			The SA assumes that any trees protected by Tree Preservation Orders within a site option will be retained, unless there is evidence to	<b>?</b>
				<b>-</b>

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.</li> </ul>		<p>suggest that this is not the case.</p> <p>In the absence of key townscape sensitivity evidence, the nature and significance of the effects against this SA Objective will primarily relate to whether the site is greenfield land or brownfield land, and whether development would regenerate existing structures that detract from the townscape.</p> <p><b>Evidence / Data Source:</b> Officer input, Townscape Sensitivity Study (when available)</p>	--	<p>The site option has high sensitivity in townscape/landscape terms and / or is located within the setting of the AONB. Mitigation is likely to be difficult/expensive. Potential for a residual major negative effect.</p>
	<p>9. Protect and enhance the distinctive townscape quality and historic heritage and its setting.</p> <p>Relevant JCS SA Objective: 5, 7</p>	<p>The nature and significance of the effects against SA Objective 9 will primarily relate to <b>designated heritage assets</b> (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Areas of Archaeological Potential &amp; Importance) and their setting.</p>	++	<p>Development at the site option has the potential for a major positive effect on the significance of a designated heritage assets and / or its setting.</p>
		<p>Any important non-designated heritage assets</p>	+	<p>Development at the site option has the potential for minor positive effects as it may secure appropriate new uses for unused Listed Buildings and / or enhance the setting of, or access / signage to designated assets.</p>

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>will be noted within the appraisal commentary.</p> <p>Are there any designated heritage assets or their setting, which could be affected within or adjacent to the site?</p> <p>Are there any opportunities to enhance heritage assets, such as: securing appropriate new uses for unused Listed Buildings; the removal of an eyesore could have a positive effect on the setting of designated assets; improved access and signage?</p> <p>The SA will also consider the nature and significance of the effects identified against the topic Townscapes / Landscapes in terms of the setting of designated heritage assets.</p> <p>The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance</p>	<p><b>0</b></p> <p><b>?</b></p> <p><b>-</b></p> <p><b>--</b></p>	<p>Development at the site option will have no significant effect. This may be because there are no heritage assets within the influence of proposed development, or that mitigation measures are considered to reduce negative effects with the potential for a residual neutral effect.</p> <p>Element of uncertainty until more detailed lower level surveys and assessments have been carried out.</p> <p>Development has the potential for a residual minor negative effect on designated heritage asset(s) and/ or their setting.</p> <p>Development has the potential for a residual major negative effect on designated heritage asset(s) and/ or their setting. Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect.</p>

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>of effects against this SA Objective.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.</p> <p><b>Evidence / Data Source:</b> National Heritage List for England, DEFRA Magic Map, and GIS map layers supplied by Gloucester City Council.</p>		
<ul style="list-style-type: none"> <li>There is a national requirement to minimise waste production and waste sent to landfill.</li> </ul>	<p>10. Minimise the volume of waste created and promote the waste hierarchy (reduce, reuse, recycle)</p> <p>Relevant JCS SA Objective: 9</p>	<p>It is assumed that development at any of the site options could minimise the creation of waste and promote the waste hierarchy. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 10, and this SA Objective will not be a key differentiator between site options.</p>		
<ul style="list-style-type: none"> <li>Previously developed land may be subject to contamination</li> <li>Certain areas of the City suffer from traffic congestion and poor air quality.</li> </ul>	<p>11. Improve air quality, reduce noise and light pollution and reduce the amount of contaminated land</p> <p>Relevant JCS SA Objective: 5, 6, 9</p>	<p>Air quality is closely linked to traffic, and as such the potential direct effects of development at a site option on traffic (appraised in SA Objective 6a) are considered to lead to indirect effects of the same nature and significance on air quality. Therefore, to avoid duplication, the appraisal does not assess the effects on air quality separately against this SA Objective.</p>	<p>++</p> <p>+</p> <p>0</p>	<p>A major positive effect is not considered possible.</p> <p>Development at the site could address an existing amenity issue for neighbouring land uses.</p> <p>Development at the site is not likely to be affected by any</p>

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>It is assumed that any potentially contaminated land would be investigated and if necessary remediated prior to development, as a result contaminated land will not determine the nature and significance of the effects against this SA Objective, however the appraisal summary will note if there is the potential for contaminated land to be present at a site option.</p>		<p>conflicting neighbouring land uses, or affect the amenity of a sensitive neighbouring land use. Potential for a residual neutral effect if there is suitable mitigation available to address minor negative effects.</p>
			?	<p>An element of uncertainty exists until more detailed site level assessments have been undertaken.</p>
			-	<p>Development at the site could potentially be affected by neighbouring land uses and/or could affect the amenity of a sensitive neighbouring land use.</p>
		<p>It is assumed that any potential noise and light pollution arising from development, particularly during construction, can be mitigated through the development management process, to include the provision of a Construction Environmental Management Plan (CEMP) where necessary.</p>	--	<p>Development at the site could potentially be significantly affected by neighbouring land uses and/or could significantly affect the amenity a sensitive neighbouring land use.</p>
		<p>The nature and significance of the effects against SA Objective 11 will therefore primarily relate to any potential <b>conflicting neighbouring land uses</b>.</p>		



Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ Need to plan for and protect quality employment land and ensure a future supply</li> <li>■ There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry</li> <li>■ There are older, less attractive employment areas</li>   <li>■ Poor retail provision compared to the size of Gloucester's shopper population</li> <li>■ Limited early hours / evening economy</li> <li>■ Lack of overnight tourist visitors</li> </ul>	<p>12. Ensure the availability of employment land and premises to secure future prosperity potential</p> <p>Relevant JCS SA Objective: 10</p>	<p><b>Evidence / Data Source:</b> Google Maps and Officer input</p>		
		<p>The nature and significance of the effects against both SA Objective 12 and 13 will primarily relate to the <b>capacity of the site to accommodate new employment development</b></p>	++	<p>Potential for the site option to accommodate a strategic level of employment development (equal to or more than 1ha).</p>
			+	<p>Potential for the site option to accommodate employment development (less than 1ha).</p>
		<p><b>Evidence / Data Source:</b> Officer input</p>	0	<p>If no employment is being proposed as part of development, as it is a housing site option, then it is considered to have a neutral effect against this SA Objective.</p>
			?	<p>There is an element of uncertainty as the capacity of the site option for employment development is unknown.</p>
			-	<p>Development at the site option may result in a net loss of existing employment.</p>
			--	<p>Not applicable.</p>
	<p>13. Support the economy by helping new and existing businesses to fulfil their potential</p> <p>Relevant JCS SA Objective: 10</p>	<p>The SA assumes that any proposal for development can make appropriate and</p>	++	<p>The site option is located within reasonable walking distance (800m) of all / the majority of key</p>

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ There are areas of the City that experience high unemployment rates</li> <li>■ High levels of in-commuting</li> <li>■ There are opportunities to connect new employment development with key transport infrastructure projects (e.g. the M5 and Blackfriars to support the growth zone identified in the Strategic Economic Plan, and alongside the new bus station)</li> </ul>	destination and local centres that support local needs.  Relevant JCS SA Objective: 11	timely provision or contributions for necessary supporting infrastructure, including community facilities and services.  The nature and significance of the effects against SA Objective 14 will primarily relate to the <b>distance of the site from existing services and facilities</b>  Services and facilities that will be assessed as crucial to meet local needs include supermarket, convenience store, post office, community centre and bank  Health facilities (GP, Dentist, Pharmacy, and medical centres) are assessed against SA Objective 17  Educational facilities (nursery, child-care, primary and secondary schools, and further education establishments) are assessed against SA Objective 24		services and facilities located within the City centre
			+	The site option is located within reasonable walking distance (800m) of all / the majority of key services and facilities located within the a local centre
				A neutral effect is not considered possible.
			0	
			?	There is an element of uncertainty until lower level assessments have been carried out
			-	The site is located beyond reasonable walking distance (800m) to the majority of services and facilities located within either the City centre or a local centre
--	The site is located beyond reasonable walking distance (800m) to all services and facilities assessed against this SA Objective.			

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ <i>There is a need to ensure carbon emissions are minimised</i></li>   <li>■ There are inequalities in opportunity across the Plan area</li> <li>■ 'Pockets' of acute deprivation exist in some parts of the City</li> </ul>		<p>A reasonable walking distance of 800m has been utilised in the assessment <sup>18</sup>.</p> <p><b>Evidence / Data Source:</b> GIS map layers supplied by Gloucester City Council</p>		
	<p>15. Integrate sustainable construction principles and standards into all development schemes</p> <p>Relevant JCS SA Objective: 2, 3</p>	<p>It is assumed that development at any of the site options could meet sustainable construction standards. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 15, and this SA Objective will not be a key differentiator between site options.</p>		
	<p>16. Reduce inequalities in wellbeing and opportunity</p> <p>Relevant JCS SA Objective: 12</p>	<p>The nature and significance of the effects against SA Objective 16 will primarily relate to the <b>provision of development in Gloucester LSOAs in the 10-30% most deprived areas in England</b><sup>19</sup>.</p> <p><b>Evidence / Data Source:</b> DCLG Indices of Deprivation</p>	++	<p>The site will deliver new housing or employment land within the most deprived 10-30% LSOAs in England.</p>
+	<p>The site will deliver new housing or employment land in an area outside of the identified LSOAs in the most deprived 10 to 30% in England.</p>	0	<p>A neutral effect is not considered possible.</p>	

<sup>18</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance

<sup>19</sup> DCLG Indices of Deprivation - Lower Super Output Areas (LSOAs) in the most deprived 10 to 30% in England 2015; [Westgate; 004B, 004E, 004F. Podsmead; 009E. Matson and Robinswood; 008C, 011A, 011B, 011D, 011E. Kingsholm and Wotton; 002C. Moreland; 004A, 008D, 008E. Barton and Tredworth; 005A, 005B, 005C, 005D, 005E, 008A, 008B. Tuffley; 012D. Barnwood; 007D, 007E, 007F.]

Key Issues	SA Objective(s)	Significance Criteria:			
<ul style="list-style-type: none"> <li>High levels of obesity in both adults and children</li> </ul>					
			?	An element of uncertainty exists until lower level assessments have been carried out	
				-	A minor negative effect is not considered possible
				--	A major negative effect is not considered possible
	17. Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities  Relevant JCS SA Objective: 14	The nature and significance of the effects against SA Objective 17 will primarily relate to the <b>distance of the site from existing health facilities and promoted walking routes</b> <sup>20</sup> .  A reasonable walking distance of 800m has been utilised in the assessment <sup>21</sup> .  <b>Evidence / Data Source:</b> GIS map layer supplied by Gloucester City Council		++	The site option is located within a reasonable walking distance (800m) of both existing health facilities and promoted routes OR Evidence suggests that development at the site option has the potential to deliver new health facilities
				+	The site option is located within reasonable walking distance (within 800m) of existing health facilities
				0	A neutral effect is not considered possible.

<sup>20</sup> Promoted walking routes are identified by Gloucestershire County Council as long distance PROWs that are known to be safe, good quality routes promoting ease of movement

<sup>21</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance

Key Issues	SA Objective(s)	Significance Criteria:									
<ul style="list-style-type: none"> <li>■ Homelessness</li> <li>■ There is acute housing 'need' in the City</li> <li>■ There is a significant growth in the population predicted, particularly in the young and working age bands</li> <li>■ Growth in the number of households, in particular single person households, and a need to balance the housing stock to accommodate this</li> </ul>			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; width: 10%;">?</td> <td style="padding: 5px;">There is an element of uncertainty until lower level assessments have been carried out.</td> </tr> <tr> <td style="text-align: center; background-color: yellow;">-</td> <td style="padding: 5px;">The site option is located beyond reasonable walking distance (over 800m) to existing health facilities</td> </tr> <tr> <td style="text-align: center; background-color: orange;">--</td> <td style="padding: 5px;">The site option is located beyond reasonable walking distance (800m) to both existing health facilities and promoted routes OR Development at the site option could result in the loss of existing medical facilities.</td> </tr> </table>	?	There is an element of uncertainty until lower level assessments have been carried out.	-	The site option is located beyond reasonable walking distance (over 800m) to existing health facilities	--	The site option is located beyond reasonable walking distance (800m) to both existing health facilities and promoted routes OR Development at the site option could result in the loss of existing medical facilities.		
	?	There is an element of uncertainty until lower level assessments have been carried out.									
	-	The site option is located beyond reasonable walking distance (over 800m) to existing health facilities									
	--	The site option is located beyond reasonable walking distance (800m) to both existing health facilities and promoted routes OR Development at the site option could result in the loss of existing medical facilities.									
	<p>18. Ensure the availability of housing land and premises including affordable housing to meet local need</p> <p>Relevant JCS SA Objective: 15</p>	<p>The nature and significance of the effects against SA Objective 18 will primarily relate to the <b>capacity of the site option to accommodate new housing.</b></p> <p>The SA assumes that development at any of the site options could be delivered to a high quality and could provide an appropriate mix of housing types and tenures.</p> <p><b>Evidence / Data Source:</b> Officer input</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; background-color: green;">++</td> <td style="padding: 5px;">The site option has the potential to provide a significant amount of new housing (100 dwellings or more)</td> </tr> <tr> <td style="text-align: center; background-color: lightgreen;">+</td> <td style="padding: 5px;">The site option has the potential to provide new housing (less than 100 dwellings)</td> </tr> <tr> <td style="text-align: center; background-color: blue; color: white;">0</td> <td style="padding: 5px;">If no housing is being proposed as part of development, as it is an employment site option, then it is considered to have a neutral effect against this SA Objective.</td> </tr> <tr> <td style="text-align: center;">?</td> <td style="padding: 5px;">There is an element of uncertainty as the capacity of the site option for housing development is unknown at this stage.</td> </tr> </table>	++	The site option has the potential to provide a significant amount of new housing (100 dwellings or more)	+	The site option has the potential to provide new housing (less than 100 dwellings)	0	If no housing is being proposed as part of development, as it is an employment site option, then it is considered to have a neutral effect against this SA Objective.	?	There is an element of uncertainty as the capacity of the site option for housing development is unknown at this stage.
	++	The site option has the potential to provide a significant amount of new housing (100 dwellings or more)									
	+	The site option has the potential to provide new housing (less than 100 dwellings)									
0	If no housing is being proposed as part of development, as it is an employment site option, then it is considered to have a neutral effect against this SA Objective.										
?	There is an element of uncertainty as the capacity of the site option for housing development is unknown at this stage.										

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li data-bbox="203 440 696 600">■ The City needs to protect areas of public open space and green corridors/networks and provide a comprehensive, connected and accessible network of spaces.</li> <li data-bbox="203 1198 573 1230">■ Crime and fear of crime.</li> </ul>			-	Not applicable.
	19. Minimise development on open space and green spaces Relevant JCS SA Objective: 16	<p>The nature and significance of the effects against both SA Objective 19 and 20 primarily relate to the <b>accessibility of open space and green space</b> in relation to the site option, as well as the potential for development to result in a <b>net loss / net gain</b> in open or green spaces.</p> <p>A reasonable walking distance of 800m has been utilised in the assessment<sup>22</sup>.</p> <p><b>Evidence / Data Source:</b> GIS map layer supplied by Gloucester City Council.</p>	--	Not applicable.
	20. Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations Relevant JCS SA Objective: 16		++	Development at the site option has the potential to result in a net gain in open / green space
			+	The site option is located within reasonable walking distance (800m) of existing open / green space
			0	A neutral effect is not considered possible.
			?	There is an element of uncertainty until lower level assessments have been carried out.
			-	The site option is located beyond reasonable walking distance (800m) to existing open / green space
			--	Development at the site option would result in a net loss of open / green space
	21. Reduce crime and the fear of crime			

<sup>22</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance

<sup>23</sup> Secured by Design Homes 2016; Official Police Security Initiative

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>Localism driving increased local level participation.</li> </ul>	Relevant JCS SA Objective: 13	site options have the potential for minor positive effects against SA Objective 21, and this SA Objective will not be a key differentiator between site options.		
	22. Encourage everyone to participate in local decision making  Relevant JCS SA Objective: N/A	It is assumed that development at any of the site options could encourage people to participate in local decision making. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 22, and this SA Objective will not be a key differentiator between site options.		
<ul style="list-style-type: none"> <li>Educational achievement needs improving</li> </ul>	24. Support the development of accessible education, skills and learning, to meet the needs of both employers and the working population  Relevant JCS SA Objective: 17	The nature and significance of the effects against SA Objective 24 will primarily relate to the <b>distance of the site from existing educational facilities.</b>  A reasonable walking distance of 800m has been utilised in the assessment <sup>24</sup> .  <b>Evidence / Data Source:</b> GIS map layer supplied by Gloucester City Council	<div style="background-color: #008000; color: white; text-align: center; padding: 2px;">++</div>	Evidence suggests that development at the site option has the potential to deliver new educational facilities
	<div style="background-color: #90EE90; text-align: center; padding: 2px;">+</div>		The site option is located within a reasonable walking distance (within 800m) of educational facilities	
	<div style="background-color: #0000FF; color: white; text-align: center; padding: 2px;">0</div>		A neutral effect is not considered possible.	
	<div style="background-color: #FFFFFF; text-align: center; padding: 2px;">?</div>		There is an element of uncertainty until lower level assessments have been carried out.	
	<div style="background-color: #FFFF00; text-align: center; padding: 2px;">-</div>		The site option is located beyond reasonable walking distance (over 800m) to educational facilities	
	<div style="background-color: #FFA500; text-align: center; padding: 2px;">--</div>		Development at the site option could result in the loss of existing educational facilities.	
	<div style="background-color: #FFFFFF; text-align: center; padding: 2px;"></div>			

<sup>24</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance

Key Issues	SA Objective(s)	Significance Criteria:
<ul style="list-style-type: none"> <li>■ Adequate protection of cultural heritage.</li> </ul>	<p>25. Protect and enhance the cultural heritage and offering of individual settlements</p> <p>Relevant JCS SA Objective: 18</p>	<p>It is considered that there is insufficient evidence available at this stage to make a reasonable judgement on the potential effects of development and the Draft GCP on cultural heritage.</p>



## Appraising the Draft Gloucester City Plan (GCP)

- 2.6 The draft Vision for the GCP was appraised against the SA Objectives for sustainable development. A compatibility analysis of the proposed issues for GCP Objectives with the SA Objectives was undertaken and the findings reported here in summary in section 5 with the detailed analysis provided in Appendix III.
- 2.7 Each site allocation was appraised against the full SA Framework of Objectives using professional judgement and the baseline evidence. Where possible and appropriate, specified qualitative and quantitative thresholds were used to define 5 categories of significance of effects (major and minor negative; neutral; major and minor positive). The assessment of effects considered the nature of the likely sustainability effects, including positive/negative, short-medium term (5-10 years)/long term (10-20 years plus), permanent/temporary, direct/indirect, cumulative and synergistic, were described in accordance with Schedule 2 of the SEA Regulations.
- 2.8 An appraisal commentary was provided on how the potential allocation would progress SA Objectives, and where appropriate, recommendations for enhancement and mitigation were provided. Detailed SA matrices for site allocations are provided in Appendix IV of this SA Report and summary findings are set out in sections 4 and 5. Where uncertainty or gaps in information were apparent, this was recorded.
- 2.9 The SA of the Draft GCP, including policies, is structured under 12 topic headings, which have been linked to the Objectives in the SA Framework as well as topics in the SEA Directive, and the relevant Gloucester City Plan Topic Papers. This provides a framework and structure to evaluate the likely significant effects of the Draft GCP against these key topics. The appraisal of each topic has been divided into a number of sub-headings to ensure that each aspect of the emerging Plan (policies and site allocations) is considered as well as the interrelationships between topics and cumulative/synergistic effects of the Plan as a whole.
- 2.10 The SA is informed by the best available information and data. However, data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments, or design aspects, that are more appropriately undertaken at the next stage of planning – at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level. Therefore, a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

## Consultation

- 2.11 The SEA Directive and Regulations require early and effective public consultation. The development of the GCP has been subject to three rounds

of consultation so far. This SA Report will accompany the Draft GCP on consultation in January 2017. This SA Report will be subject to consultation with the SEA statutory bodies (Historic England, the Environment Agency, and Natural England), stakeholders and the public. Any comments received on the SA will be taken into consideration and reported in the subsequent stages of plan-making and the SA process.

## 3.0 Sustainability Context, Objectives & Baseline Characteristics

### Introduction

- 3.1 The GCP has, up until this stage, relied on previous scoping work to identify the key issues and opportunities for the Gloucester Plan area. A Scoping Report was produced in 2005 to support the previous development plan, and a Scoping Report was also produced in 2008 to support the GCT JCS. The baseline data and plans and programmes (PP) review in the 2008 Scoping Report is continually updated in line with the progression of the JCS. An update to this baseline and PP review occurred in 2011 in line with the development of the JCS Preferred Options Document, and then again in 2012/13. This information is also supported by detailed Ward Profiles which accompanied the City Plan Part 2.
- 3.2 Independent specialist consultants, Enfusion, were commissioned by the Council in June 2016 to review and progress the SA of the GCP. As part of this review it was considered appropriate to update the baseline information and PP review to take account of more recent evidence and any new issues or opportunities arising. This section presents the updated PP review along with a summary of the implications for the GCP, and updated baseline information along with the likely evolution without the Plan. Key issues and opportunities have also been updated in line with this evidence and are presented below.

### Updated Review of Relevant Plans & Programmes (PP)

- 3.3 In order to establish a clear scope for the SA of the Gloucester City Plan (GCP), it is necessary (and a requirement of SEA) to review and develop an understanding of the wider range of plans and programmes that are relevant to the Plan. This includes International, European, National, Regional, and Local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the GCP could help fulfil them.
- 3.4 The GCP will sit beneath, and be in conformity with, a higher level strategic plan (the Joint Core Strategy) covering the areas of Gloucester City, Cheltenham Borough, and Tewkesbury Borough. A Plans and Programmes Review was undertaken during the scoping stage of the SA of the higher level Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (GCT JCS) and presented in the 2008 Scoping Report. This was updated in 2011 (JCS Preferred Options stage), and more recently in 2012/13. The 2008 GCT JCS Scoping Report has been prepared to cover the appraisal of the JCS itself, and any subsequent documents prepared by the JCS authorities that would sit beneath the JCS. The GCP is one such document. This information is also supported by an initial Scoping Report undertaken in 2005 by Gloucester City Council to support its previous development plan.
- 3.5 Independent specialist consultants, Enfusion, have undertaken the SA process for the GCT JCS, and with strong working relationships with the JCS authorities, have now been commissioned to ensure compliance in the SA process as the

GCP develops further. This work will include an update to the Plans and Programmes Review.

- 3.6 It is not deemed necessary to duplicate the work already done, and as such a summary of key plans and programmes that have been updated since previous reviews, and locally specific plans and projects, is provided below. This should be read in conjunction with the Plans and Programmes Review provided in the SA of the GCT JCS (Oct 2013 - Appendix IV), and in the initial GCP SA Scoping Report prepared by Gloucester City Council (2005). It is further considered that relevant international plans and policy have been transposed into national plans, policy and legislation, which have been considered below.

### Key Plans and Programmes

#### National:

- **DCLG, National Planning Policy Framework (NPPF), 2012** - the NPPF is the overarching planning framework which provides national planning policy and principles for the planning system in England.
- **DCLG, Planning Policy for Traveller Sites, 2015** - to be read in conjunction with the NPPF, this policy document sets out the Government's planning policy for traveller sites to ensure fair and equal treatment for travellers
- **Environment Agency, Managing Water Abstraction, 2013** - is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.
- **The Heritage Alliance, Heritage 2020** - the historic environment sector's plan for its priorities between 2015 and 2020.
- **Historic England, Action Plan 2015-2018** - the Plan is the delivery document for the Historic England Corporate Plan and sets out the contribution Historic England will make to Heritage 2020.
- **Defra, Biodiversity 2020 - A strategy for England's wildlife and ecosystem services, 2011** - the strategy builds on the Natural Environment White Paper and implements international and EU biodiversity commitments. It sets out the strategic direction for biodiversity policy on land and at sea.
- **Defra, Waste Management Plan for England, 2013** - the plan sets out the measures for England to work towards a zero waste economy.
- **Public Health England, Global Health Strategy 2014 to 2019** - identifies global health strategic priorities over the 5-year period and delivery mechanisms to achieve them.
- **Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016 - 2021** - brings together the Government's plans for economic infrastructure over the next 5 years with those to support delivery of housing and social infrastructure.
- **DECC, Energy Efficiency Strategy, 2012** - sets the direction for energy efficiency policy and identifies the potential available in the UK economy.
- **DECC, UK National Energy Efficiency Action Plan, 2014** - sets out how the UK will implement the Energy Efficiency Directive and help to achieve the EU 20% energy saving target for 2020.

- **DEFRA, Air Quality Plan for Nitrogen Dioxide (NO<sub>2</sub>) in UK, 2015** - the government's plan for reducing nitrogen dioxide emissions in towns and cities, setting targeted local, regional and national measures.

**Regional:**

- **Severn Trent, Water Resources Management Plan 2014** - identifies the water supply area and forecasts water demand and supply over a 25-year period. The Plan further identifies preferred options to manage demand and provide supply.
- **Defra, Welsh Government, Natural Resources Wales and Environment Agency, Severn River Basin District River Basin Management Plan, December 2015** - provides a framework for protecting and enhancing the benefits provided by the water environment. Key information like baseline classification of water bodies, statutory objectives for protected areas, statutory objectives for water bodies and a summary programme of measures to achieve statutory objectives is used to inform land-use planning.
- **River Severn: Catchment Flood Management Plan, 2009** - identifies the scale and extent of flooding in the River Severn catchment, now and in the future, setting policies for the management of flood risk.

**Local:**

- **Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, Submission Version, November 2014** - overarching development plan for the Gloucester, Cheltenham and Tewkesbury plan areas, including strategic site allocations and development management policies.
- **GFirst Local Enterprise Partnership, Strategic Economic Plan for Growing Gloucestershire, March 2014** - outlines plans to drive growth of 4.8% GVA in the economy by 2022, proposing a Growth Zone, a Growth Hub and a centre of excellence in renewable energy, engineering and nuclear skills.
- **Gloucester City Council, Regeneration and Economic Development Strategy, 2016 - 2021** - sets out the ambitions for Gloucester, and key future regeneration projects including Kings Quarter, Bakers Quay, and Blackfriars.
- **Quedgeley Parish Council, Quedgeley Parish Plan, 2012 - 2017** - sets out the vision over a 20-year period and a 5-year action plan to progress towards achieving this vision.
- **Gloucestershire County Council and Gloucester City Council, A Plan for the Air Quality Management Areas at Priory Road, Painswick Road and Barton Street in the City of Gloucester, 2011** - details recommendations for improving air quality in the City, and identifies future traffic and air quality monitoring and review needs. A progress report was published in 2014 which identifies any current exceedances (of which there were none) and proposed actions.

- **Gloucester City Council, Open Space Strategy, 2014 - 2019** - the Council's strategy to protect, manage and enhance its open spaces over the 5-year timeframe and beyond.
- **Gloucestershire County Council, Gloucestershire Waste Core Strategy, 2012** - sets policy and objectives for waste management in Gloucestershire in the period 2012 - 2027.
- **Gloucestershire County Council, Minerals Local Plan Site Options and Draft Policy Framework (Consultation Document June 2014), and Addendum (Consultation Document February 2015)** - sets the framework for the future supply of minerals in Gloucestershire.
- **Gloucester Playing Pitch Strategy, 2015 – 2025** - provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities.
- **Gloucester City Council, Gloucester Artificial Grass Pitch Strategy, 2015** - to deliver Artificial Grass Pitches which are critical to the delivery of the vision of the Playing Pitch Strategy (2015) above.
- **Gloucester City Council, Gloucester's Cultural Vision and Strategy, 2016 - 2026** - sets out the Council's ambitions and opportunities for the development of culture in the City.
- **Growing Gloucester's Visitor Economy 2014 (Marketing Gloucester)** – sets out a strategic plan for driving growth in the value of Gloucester's visitor economy.
- **Gloucester City Council, Gloucester City Vision 2012 – 2022** – sets out the key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver.

### Neighbourhood Plans

- Hempsted Neighbourhood Plan Area designated

### Neighbourhood Plans (in close proximity to the boundary of Gloucester)

- Hardwicke (Stroud District)
- Churchdown and Innsworth (Tewkesbury Borough)
- Down Hatherley, Norton & Twigworth (Tewkesbury Borough)
- Highnam (Tewkesbury Borough)

### Implications for the GCP and SA

- 3.7 Growth will inevitably increase traffic on the roads which also has implications for air quality. Growth further has the potential to affect; local biodiversity networks; designated and non-designated heritage and their settings; townscape character; and natural resources including water resources, quality and flooding. Employment growth may also enhance or detract from the vitality and viability of the city and town centres.
- 3.8 Growth therefore has the potential to affect a number of plans and strategies that seek to maintain and enhance these assets, or grow the value of Gloucester's economies. The GCP and SA process can seek to minimise the effects of this through appropriately siting new development, identifying

where mitigation may be needed and requiring the necessary transport or other provisions and contributions from new development.

- 3.9 The GCP can further plan for water efficiency, and phasing of development to minimise effects on water resources, as well as ensure that water quality is maintained and enhanced in the plan area. The GCP and SA should seek to identify opportunities to maximise the potential for alternative modes of transport to the car, reduce the need to travel, and therefore reduce emissions; through the consideration of alternatives and assessment of both negative and positive significant effects.
- 3.10 The Gloucester City Plan also presents significant opportunities to support other existing plans and strategies. The GCP can support increased energy efficiency and waste minimisation measures for new development, as well as the promotion of renewable energy. The GCP can support reductions in inequalities and contribute to improving the overall well-being of communities.
- 3.11 The delivery of new housing, employment and supporting infrastructure, in sustainable and accessible locations can support existing and new communities by meeting local needs and addressing shortages. The GCP can ensure that new development supports healthy and active lifestyles and ease of movement, to promote a modal shift, by appropriate siting of new development and the delivery of planning gains, including improvements to the highways network, green infrastructure, biodiversity and local services and facilities.
- 3.12 The GCP presents an opportunity to strategically plan development to maximise potential opportunities arising for local economies, communities, health and the natural environment. The SA process will also support the identification and refinement of options that can contribute to reducing inequalities, and support the development of policy approaches that cumulatively improve the well-being of local communities.
- 3.13 Overall, the SA process should inform the development of the Plan by helping to identify sensitive receptors and seek to ensure that adverse sustainability effects are minimised and opportunities for sustainable development are maximised.

### **Updated Baseline Conditions & Likely Evolution without the GCP**

- 3.14 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the Plan area and providing the basis for predicting and monitoring effects of the GCP. To make judgements about how the emerging content of the GCP will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the Plan area today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the Plan area to allow the potential effects of the GCP to be adequately predicted.

- 3.15 The SA/SEA Guidance produced by Government<sup>25</sup> proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the SA process guides plan making as new information becomes available.
- 3.16 The GCP will sit beneath, and be in conformity with, a higher level strategic plan (the Joint Core Strategy) covering the areas of Gloucester City, Cheltenham Borough, and Tewkesbury Borough. Baseline information was collated during the scoping stage of the SA of the higher level Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (GCT JCS) and presented in the 2008 Scoping Report. This was updated in 2011 (JCS Preferred Options stage), and more recently in 2012/13. The 2008 GCT JCS Scoping Report has been prepared to cover the appraisal of the JCS itself, and any subsequent documents prepared by the JCS authorities that would sit beneath the JCS. The GCP is one such document. This information is also supported by an initial Scoping Report undertaken in 2005 by Gloucester City Council to support its previous development plan.
- 3.17 Independent specialist consultants, Enfusion, have undertaken the SA process for the GCT JCS, and with strong working relationships with the JCS authorities, have now been commissioned to ensure compliance in the SA process as the GCP develops further. This work will include an update to the baseline information.
- 3.18 It is not deemed necessary to duplicate the work already done. The baseline information provided below is structured around SEA themes, and should be read in conjunction with baseline information provided in the SA of the GCT JCS (Oct 2013 - Appendix IV), and in the initial GCP SA Scoping Report prepared by Gloucester City Council (2005).

## **Themes (current situation, trends and evolution without the Plan)**

### **Communities**

- 3.19 In 2014 the population of Gloucester was estimated to be 125,600<sup>26</sup>, demonstrating a continuing increasing trend since 2001<sup>27</sup>. Gloucester will experience the greatest population growth of all the county districts, expected to increase by 20.1% or 23,800 people between 2010 and 2035<sup>28</sup>. Gloucester is a relatively young city with 25% of the population aged 19 and under (highest in the South West) and 39% under 30. The city is expected to experience the greatest increase of Gloucestershire's districts in the number

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<sup>25</sup> Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

<sup>26</sup> NOMIS official labour market statistics

<sup>27</sup> ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

<sup>28</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy



of children and young people between 2010 and 2035, with an increase of 16.4%<sup>29</sup>.

- 3.20 In 2011<sup>30</sup>, the majority of people in the Plan area lived in two people households, followed closely by single occupancy households. The housing stock in Gloucester was identified as 53,413 dwellings; 85.5% of which were private housing; 8.6% were local authority housing; and 5.9% were registered social landlord housing. The average rent charged for all registered social landlord dwellings was also higher than the South West and England average. 109 households between 2010 and 2011 were identified as Statutory Homeless. Although ward boundaries have been amended since the data was produced, evidence<sup>31</sup> suggests that the wards of Abbey, Elmbridge, Grange, Hucclecote and Longlevens contain high level of home ownership (over 80% of total households), compared to Kingsholm and Wotton, Podsmead and Westgate which contain the lowest levels of home ownership (below 50% of households). The highest levels of social renting were identified in the wards of Matson and Robinswood, and Podsmead, and the highest levels of private renting were identified in the wards of Westgate, Kingsholm and Wotton, and Barton and Tredworth.
- 3.21 The majority of houses in the Plan area are semi-detached, followed by terraced housing and then detached housing. The majority of flats/apartments are purpose-built blocks of flats or apartments. In 2011 there was also a total count of 201 caravans or other mobile/temporary structures, and 200 shared dwellings.
- 3.22 ONS further identify in 2011 that median house prices in the Plan area range from £222,000 for a detached house to £105,000 for a flat/maisonette. However in 2016, Zoopla identify significantly higher average house prices paid in the last twelve months, ranging from an average price of £297,088 for a detached house to £118,208 for a flat. The SHMA identifies average property prices paid across the Gloucestershire County areas during 2009 and 2012, and demonstrates that the average property prices in Gloucester are significantly less than those found in the surrounding areas within the County (Cheltenham, Cotswold, Tewkesbury, Stroud and Forest of Dean).
- 3.23 The Centre for Cities Outlook 2014<sup>32</sup> identifies that Gloucester is ranked 2<sup>nd</sup> out of 63 cities for the highest housing stock growth. Among the top-placed cities, only five (Swindon, Milton Keynes, Gloucester, London and Peterborough) have experienced housing supply growth in accordance to their population growth rates.
- 3.24 The SHMA<sup>33</sup> identifies that the size of the private rented sector increased by over 70% in the County between 2001 and 2011. This substantial growth matches regional and national trends. Much of the growth of the private

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<sup>29</sup> Ibid

<sup>30</sup> ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

<sup>31</sup> ONS – 2011 Census

<sup>32</sup> Centreforcities (2014) Cities Outlook 2014

<sup>33</sup> HDH Planning and Development Ltd (2014) Local Authorities of Gloucestershire Strategic Housing Market Assessment Update

rented sector in Gloucestershire, has been from prosperous households unable to access home ownership, but also young adults remaining in shared accommodation in the sector for longer and also households requiring financial support (Local Housing Allowance) to afford a market home. It is estimated that in Gloucestershire County in 2013 27.4% of households in the private rented sector are supported by Housing Benefit or Local Housing Allowance, compared to around 25% nationally. The SHMA identifies that within Gloucestershire some 24.3% of all households in Gloucestershire are theoretically unable to afford market accommodation of an appropriate size in 2013, compared to 22.7% in 2009 (the previous SHMA).

- 3.25 Gypsy and Traveller policy is provided at the County level, and Gloucester (along with the other districts in Gloucestershire) adheres to this policy, which is currently under review. Tewkesbury houses the largest Gypsy and Traveller site within Gloucestershire with 46 plots at the Willows, Sandhurst Lane. There are a further three sites in the County at Elmstone Hardwicke, Twyning (near Tewkesbury), and Culkerton (near Tetbury), providing a further 33 plots. There are no permanent Gypsy and Traveller sites within Gloucester. There is a temporary site with two pitches at Sims Lane in the south of the City, and a significant travelling showpeople community of Westend Parade in the north of the City.
- 3.26 The Cultural Strategy<sup>34</sup> identifies that Gloucester is further developing its cultural capital through redevelopment and regeneration programmes. However, it further recognises that Gloucester lags behind cities of similar size and status and does not compare especially well with regional neighbours. The Strategy identifies a lack of high quality arts and cultural provisions, and outside of the regenerated Docks area the night-time economy is more limited and tends to be targeted towards the under 25s. It is further identified that despite outstanding heritage assets and investment, the visitor experience could be significantly enhanced. It is felt that the cultural sector in Gloucester generally is underdeveloped, fragmented and feels undervalued.
- 3.27 ONS crime statistics<sup>35</sup> identify that the most frequent type of crime committed in Gloucester during 2012 and 2013 was criminal damage and arson, followed by vehicle offences. Gloucester City Council have produced a design guide<sup>36</sup> with seven main principles to deliver safety in design in new development.

### ***Evolution without the Plan***

- 3.28 Without the Plan there is likely to be a less coordinated approach to the delivery new employment, housing and infrastructure. New development is less likely to be delivered in areas where it is needed most, which could exacerbate inequalities and problems with affordability across the Plan area. It could also make it more difficult to effectively meet the needs of the community. The Local Plan provides an opportunity to set out specific policies for particularly sensitive communities that seek to address particular

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<sup>34</sup> Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

<sup>35</sup> ONS, Neighbourhood Statistics: Gloucester Local Authority Crime and Safety

<sup>36</sup> Gloucester City Council - Designing Safer Places

sustainability issues and which could include requirements for new development in and around those areas.

### **Economy and Employment**

- 3.29 In 2015<sup>37</sup>, 84.4% of people in Gloucester were economically active, and there were a higher percentage of males that were economically active than females. 5.1% of people in the Plan area were unemployed. 15.6% of people were economically inactive of which 36.2% wanted a job, and 63.8% did not want a job. Of those in employment, the majority (38.1%) were in professional occupations (including managers, directors, senior officials, associate professional and technical), followed by administrative, secretarial and skilled trade occupations. Evidence<sup>38</sup> suggests that in 2011 Gloucester had a working population of 64,134 people, of which 22,300 came from outside of Gloucester but from within the region, and 3,799 came from outside of the region to access employment in Gloucester.
- 3.30 Over half of the people of Gloucester (aged 16-64) are educated to NVQ3 level and above, but 8.1% have no qualifications<sup>39</sup>. The city boasts high performing schools and over 17,000 college and university students, and is home to higher education campuses for the University of Gloucestershire, the University of the West of England and Gloucestershire College<sup>40</sup>.
- 3.31 The median weekly pay for all full-time workers living in the area is £477.10, which is lower than both the average for the South West and for Great Britain<sup>41</sup>. However, in line with national trends, male full-time workers on average earn more than female full-time workers, and male full-time workers in Gloucester earn higher than the average weekly wage for the South West (although still below the average for Great Britain). Female full-time workers living in the area however earn significantly less than the South West and Great Britain average (£382.40 per week, compared to £440.10 in the South West and £471.60 in Great Britain). In April 2016, 1,450 people (aged 16-64) in Gloucester were claiming out-of-work benefits, the majority of which were aged 25 to 49.
- 3.32 In 2015, a total of 3425 business enterprises were identified, located across 4520 local units. In line with regional trends, the majority of businesses in Gloucester are micro organisations (85.4%) consisting of 0 to 9 employees. 20 (0.6%) large organisations (employing over 250 people) were identified over 25 units. The Gloucestershire Strategic Economic Plan<sup>42</sup> identifies Gloucester as an urban cluster containing the key urban settlements and main business, commercial, educational, service and cultural centres for the county. Gloucester is home to advanced engineering companies (e.g. Prima Dental), and supports a strong finance and insurance cluster as well as a growing number of information security, web hosting, CAD/CAM development,

<sup>37</sup> NOMIS official labour market statistics

<sup>38</sup> Ibid.

<sup>39</sup> Ibid.

<sup>40</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>41</sup> NOMIS official labour market statistics

<sup>42</sup> GFirst LEP (2014) Strategic Economic Plan for Gloucestershire

defence communications and security, ICT infrastructure development and IT content management businesses. The creative community has grown rapidly in recent years, with the Blackfriars and Westgate Street areas having established themselves as a hub for creative businesses<sup>43</sup>.

- 3.33 The Centre for Cities Outlook 2014 identifies that Gloucester is ranked 2<sup>nd</sup> out of 64 cities for having the highest employment rate, and that Gloucester is in the top-ten cities where small businesses are investing in high growth strategies<sup>44</sup>. Gloucester further attracts 5.9 million visitor trips each year and annually, visitor spend is £207 million<sup>45</sup>.
- 3.34 Regeneration underpins much of the significant recent development that has occurred in Gloucester and regeneration to date has been largely heritage-led (supporting sense of place and local character), with the restoration of, and new uses for, many historic buildings, including; Docks Warehouses, St Michael's Tower, Buildings at the Quays, Robert Raikes' House and 66 Westgate Street<sup>46</sup>. Phase 1 of the redevelopment scheme for King's Quarter is underway, which includes the development of a new modern bus station, linked with the adjacent train station. More significant projects that have recently been successfully delivered include:
- St Oswalds Park
  - Gloucester Docks and Quays
  - Railway Triangle / Corridor
  - Blakfriars Priory
  - Greyfriars
- 3.35 The city has a strong independent retail and leisure sector with over 100 independent city centre shops<sup>47</sup>. The Retail Study<sup>48</sup> identifies that existing commitments are capable of accommodating some £80 million of convenience spending in 2031 and this more than off-sets the residual requirement. For comparison goods the residual expenditure in Gloucester for which additional floorspace is required, is £114.76 million. Gloucester City Council consider that evidence needs updating and it is noted that the JCS authorities will be preparing an immediate review of the JCS retail policy directly after it has been adopted. This will, amongst other things, set out a number of site allocations as part of the comprehensive city / town centre and retail strategy.

### ***Evolution without the Plan***

- 3.36 Without the Plan there is likely to be a less coordinated approach to the delivery new employment, housing and infrastructure. New employment and infrastructure is less likely to be delivered where it is needed most. This could affect the economic viability of the city. It could also reduce opportunities to

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<sup>43</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>44</sup> Centreforcities (2014) Cities Outlook 2014

<sup>45</sup> Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

<sup>46</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>47</sup> Ibid.

<sup>48</sup> Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Retail Study 2011-2031 Phase 1 update

address existing issues, such as out-commuting for employment and retail needs.

### **Health and Equalities**

- 3.37 The health of people in Gloucester is varied compared with the England average. Deprivation is higher than average and about 19.3% (4800) children live in poverty. Life expectancy for men is lower than the England average. Life expectancy is 13.5 years lower for men and 10.6 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. It is evident therefore that inequalities exist in the Plan area. Evidence<sup>49</sup> further identifies that this is an increase from 2014, where life expectancy was 11.7 years lower for men and 9.2 years lower for women in the most deprived areas of Gloucester than in the least deprived areas.
- 3.38 The 2015 health profile identifies that in 2012, 30.3% of adults are classified as obese and in Year 6, 23% of children are classified as obese, both of which are worse than the average for England. Health indicators that were identified as worse than the average for England further include; the rate of alcohol related harm (for adults and under 18's); the rate of adult self-harm hospital stays; levels of adult physical activity; recorded diabetes; rates of sexually transmitted infections; rates of statutory homelessness; rates of long-term unemployment; and rates of drug misuse. Health indicators identified as better than the average for England include; levels of GCSE attainment; and the rate of people killed and seriously injured on roads.
- 3.39 Public Health is managed at the county level, and the Gloucestershire Health and Wellbeing Strategy<sup>50</sup> identifies that key areas for improvement in health in the Gloucestershire County include:
- Reducing obesity
  - Reducing the harm caused by alcohol
  - Improving mental health
  - Improving health and wellbeing into older age
  - Tackling health inequalities
- 3.40 Gloucester is a diverse city, the black and minority ethnic population stands at 9.8% with approximately 100 languages and dialects spoken<sup>51</sup>.
- 3.41 There are 45 formal children's play areas in the city and over £1 million was invested in upgrading these between 2009 and 2013<sup>52</sup>. The city is home to various sporting facilities and activities including Gloucester Rugby, Oxstalls Sports Park, and Gloucester Rowing Club. Gloucester was one of the city's that hosted the 2015 Rugby World Cup. Investment in sporting facilities and activities is ongoing; the rowing club has secured £1.5 million funding for a new canalside boathouse, major refurbishment of the Blackbridge Jubilee

<sup>49</sup> Gloucester City Council (2016) Topic Paper; Health and Wellbeing

<sup>50</sup> Gloucestershire Shadow Health and Wellbeing Board, Gloucestershire Health and Wellbeing Strategy 2012 - 2032 Fit for the Future

<sup>51</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>52</sup> Gloucester City Council, Open Space Strategy, 2014 - 2019

Athletics Track has also created an all-weather floodlit synthetic track, and further outline planning consent have been given for new sporting facilities at the University of Gloucestershire<sup>53</sup>. The Open Space Strategy<sup>54</sup> however identifies that access to formal sports and play provision is also not equally distributed across the city. The Playing Pitch Strategy<sup>55</sup> further identifies shortfalls in provisions of football and rugby pitches, and asserts that demand for cricket and hockey pitches is likely to increase (particularly due to potential hockey pitch loss).

- 3.42 The Gloucester Open Space Audit<sup>56</sup> identified that the amount of public open space in the Plan area increased from 2.19 hectares per 1,000 population in 2001 to 2.35 hectares per 1,000 population in 2008. The Public Open Space Strategy<sup>57</sup> identifies that there are over 150 individual areas of public open space in the city covering 300 hectares, together with allotments, cemeteries, Robinswood Hill Country Park and Alney Island Local Nature Reserve, a total open space area of 521 hectares. This equates to just over 12% of the city's total land area which is publically accessible green space. However, the Strategy identifies that open space is not equally distributed across the city, and in some areas access to good quality, local open spaces is particularly limited.
- 3.43 There are numerous countryside sites within Gloucester which provide leisure and recreational opportunities. Gloucester City Council identify the main sites as:
- Robinswood Hill Country Park, SSSI & Local Nature Reserve; 100 hectares of Cotswold countryside within 2 miles of the city centre.
  - Alney Island Local Nature Reserve; an important habitat for wetland flora and fauna within easy walking distance of the city centre.
  - Hucclecote Meadows SSSI and Local Nature Reserve; a remnant of Gloucester's historic hay meadows, with abundant wild flowers.
  - Quedgeley Local Nature Reserve; a former garden arboretum.

### ***Evolution without the Plan***

- 3.44 The City Plan can provide enhanced protection for Green Infrastructure networks, ensuring existing spaces are not lost to new development, and that new development contributes to enhancing assets, as well as seeking to achieve overall connectivity and equality of provision at the strategic scale. New development can be planned to ensure accessibility and increase opportunities for healthy and active lifestyles. The Plan can also strategically target planning gains at most deprived areas, and thus seek to reduce inequalities. The GCP can therefore ensure that the built environment contributes to delivering health benefits, and supports healthy, inclusive and active communities. Without a Plan in place development is less likely to deliver health benefits. There would also be an increased likelihood of

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<sup>53</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>54</sup> Gloucester City Council, Open Space Strategy, 2014 - 2019

<sup>55</sup> Knight, Kavanagh & Page (2015) Gloucester Playing Pitch Strategy 2015-2025

<sup>56</sup> Gloucester City Council, Quantitative Open Space Audit, 2008

<sup>57</sup> Gloucester City Council Open Space Strategy 2014 - 2019

negative effects on Green Infrastructure networks and existing facilities (for example through loss of undesignated areas or established facilities, or fragmentation of spaces), and less clarity over the type of provisions expected within new development.

### **Transport and Movement**

- 3.45 Gloucester as an urban area has a comprehensive transport network that includes major roads, railway, bus/coach services, cycling routes and pedestrian routes.
- 3.46 Key transport links through Gloucester include; the M5 motorway linking Birmingham and Bristol; the A417 linking the M5 with the M4; A40 providing east west access; Gloucester railway station linking London, Bristol, Birmingham, Cardiff and Swindon; and a good bus network coverage with a strong commercial network. There is an airport located at Staverton<sup>58</sup> (outside of the GCP area) which provides a limited range of internal flights, as well as flying lessons and flying activities including hot air balloon flights and wing walking.
- 3.47 Despite the travel choices offered however, car usage continues to dominate. Congestion occurs on many of the roads but particularly around Gloucester and Cheltenham<sup>59</sup>. It should also be noted that traffic is a key source of emissions in the area, which indirectly affects air quality. 2011 ONS data<sup>60</sup> identifies that in line with regional and national trends the majority of households in Gloucester contain one car or van. The percentage of households with access to 2 cars/vans in Gloucester (roughly 26.9%) is higher than the national average (around 24.7%) but lower than the South West average of 28.3%. The percentage of households with access to 4 more cars/vans in Gloucester is lower than both the national and regional average at 1.7%, compared to 1.9% and 2.6% respectively. The percentage of households with access to no car or van is lower than the national average (22.6% compared to 25.8%), however it is higher than the South West average of 18.9%.
- 3.48 Transport in Gloucester is planned for at the County level, and the extant Gloucestershire Local Transport Plan<sup>61</sup> identifies current issues and objectives for the Plan area. The main issues facing the County area over the plan period 2011-2026 will be:
- Limited funding availability from Government
  - Potential change in planning and transport policy structures
  - An ageing population
  - Preventative health – obesity, heart disease, partly due to inactivity
  - The scale, rate and location of new development
  - Rising oil prices and availability of alternative fuels

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<sup>58</sup> Gloucestershire Airport

<sup>59</sup> Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

<sup>60</sup> ONS, 2011: neighbourhood.statistics.gov.uk; Gloucester (Local Authority)

<sup>61</sup> Gloucestershire County Council, Gloucestershire's Local Transport Plan 2011 - 26



- How much partners in the health services, education and others will be able to contribute in future
  - How communities will respond to the aspirations in the Localism Bill/Act for them to deliver services in their own areas
- 3.49 The update to the Transport Plan identifies that within the wider Central Severn Vale (CSV) area approximately half of the county's population live, and the area has a higher proportion of the working age population when compared to the county average. This is reflected by the high proportion of travel to work journeys that begin and end within the CSV area, which further highlights the potential for increasing walking and cycling across the area.
- 3.50 Gloucester City has, and will continue to benefit from a number of regeneration projects, and transport infrastructure will continue to be key in the successful delivery of schemes. The planned growth the GCT JCS and GCP will inevitably result in more trips within the area, and the Local Transport Plan identifies Gloucester as a strong 'trip attractor', particularly into its major employment centres. The Strategic Economic Plan<sup>62</sup> (SEP) promotes the creation of a growth zone for quality employment land in proximity to the M5 which includes Blackfriars in Gloucester.
- 3.51 There is a network of cycle routes connecting the urban area of Gloucester internally, and providing wider direct access to Bristol, Cheltenham, Tewkesbury, Worcester and Evesham, and further indirect access to Stroud, Cirencester, Swindon and Oxford. This includes National Cycle Routes 41 and 45. The Sustrans map<sup>63</sup> however identifies a lack of connections across the Cotswolds AONB, and the Draft Local Transport Plan<sup>64</sup> also identifies that there is a lack of cycle routes between Cheltenham and Gloucester (existing connections are from the north of the city).

### ***Evolution without the Plan***

- 3.52 Without the City Plan development may be less likely to deliver the necessary highways capacity improvements to accommodate the cumulative impact of new development. The GCP can strategically plan for development in areas where the existing transport networks can accommodate growth, or where the necessary improvements can be more easily provided, and in locations which improve accessibility for local communities. The GCP provides an opportunity to coordinate the delivery of new housing, employment and infrastructure which will be more effective in helping to combat out-commuting, improve accessibility and reduce the need to travel.

### ***Air Quality***

- 3.53 Evidence<sup>65</sup> identifies that Gloucester, as situated on the eastern bank of the tidal River Severn and backed by the Cotswold escarpment, has prevailing

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<sup>62</sup> GFirst LEP (2014) Strategic Economic Plan for Gloucestershire

<sup>63</sup> Sustrans.org.uk; National Cycling Network

<sup>64</sup> Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

<sup>65</sup> Bureau Veritas (2014) Gloucester City Council LAQM Progress Report 2014



winds from the southwest which follow a passage up the river, channelled by the hills in the distance to either side. Gloucester is also home to the Hempsted Landfill Site in the north west corner of the city which has an A1 environmental permit issued by the Environment Agency. 41 activities hold an environmental permit with the Council. However, the main source of air pollution in the City that gives rise to concern for compliance is road traffic emissions from major roads, notably the A417, A430 and A38 which connect Gloucester with the main highway network in Gloucestershire, as well as local traffic in the centre of Gloucester.

- 3.54 There are three Air Quality Management Areas (AQMAs) in Gloucester, located at; Painswick Road (declared 2007), Barton Street and Priory Road (both declared 2005). All three of these AQMAs were declared for exceedances in emissions of nitrogen dioxide as a result of traffic on these roads. The 2011 Air Quality Action Plan identifies that air quality in Gloucester away from heavy traffic remains good. The 2014 Progress Report further identifies that updated monitoring showed that there were no exceedances of the Air Quality Strategy objectives at any of the monitoring locations within Gloucester City Council. Continuous monitoring results for 2013 indicate that both the annual mean objective and 1-hour mean objective for nitrogen dioxide were met at the monitoring site, having shown a significant decrease in 2013. Results from diffusion tube sites also showed that nitrogen dioxide concentrations in 2013 significantly decreased from 2012.

#### ***Evolution without the Plan***

- 3.55 Without the Plan there is likely to be a less coordinated approach to the delivery of new housing, employment and infrastructure in Gloucester. This could exacerbate congestion issues on the highway network and potentially affect air quality including the existing AQMAs. The Local Plan provides an opportunity to consider the cumulative effect of new development on the existing road network and determine what additional infrastructure and wider mitigation is necessary to minimise impacts. New housing, employment and infrastructure can be delivered alongside improvements to public transport in areas that will help to reduce the need to travel and potentially help to address an existing area of congestion, such as within one of the existing AQMAs.

#### ***Energy and Climate Change***

- 3.56 The Department of Energy and Climate Change (DECC) produce the following consumption figures for Gloucester in 2013<sup>66</sup>:
- Coal – a total of 6 GWh (gigawatt hours) wholly through domestic use
  - Manufactured fuels – a total of 6.2 GWh predominantly through domestic use
  - Petroleum products – a total of 504.9 GWh predominantly through road transport
  - Gas – a total of 861.9 GWh predominantly through domestic use

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<sup>66</sup> DECC (2013) Sub-national total final energy consumption statistics: 2005-2013

- Electricity – a total of 606.2 GWh predominantly through industrial and commercial.
- 3.57 Consumption levels for all fuels, except for coal, have been steadily decreasing since 2005. The consumption of coal has been more variable over the years, with no distinguishable trend.
- 3.58 DECC further produce the following emissions figures (by sector) for Gloucester in 2013<sup>67</sup>:
  - 281.6 kt CO<sup>2</sup> from Industry and Commercial
  - 229.2 kt CO<sup>2</sup> from Domestic
  - 117.0 kt CO<sup>2</sup> from Transport
- 3.59 Emissions from all sectors have been steadily decreasing since 2005, and as identified above, Industry and Commercial remains the highest contributor to emissions of CO<sup>2</sup> in Gloucester.
- 3.60 The Climate Change Strategy<sup>68</sup> targets actions in the topic areas of buildings, transport, waste, water resources, renewable energy, biodiversity and adaptation. Each topic sets a suite of actions to address climate change issues, these include (but are not limited to):
  - Gloucestershire Energy Efficiency Advice Centre
  - Affordable Warmth Strategy
  - Energy Management Strategy for council owned buildings
  - Solar hot water for housing
  - Improvements to cycle paths
  - The adoption of travel plans for schools and businesses
  - Farmers market
  - New bus station
  - Reduced residual waste collections to increase the incentive to recycle
  - Encouraging the use of water butts
  - Gloucestershire Renewable Energy Action Plan
  - Investigating potential for hydro power at Llanthony weir
  - Severnside Countryside Management Project
  - Climate sensitive planting schemes
  - Increased use of surface water management plans
  - Re-use of buildings

### ***Evolution without the Plan***

- 3.61 Building Regulations ensure that new development contributes to reducing carbon emissions. The GCP can provide further support in the long-term approach to climate change mitigation and adaptation, particularly through the appropriate siting of new development and the delivery of mitigation measures like new green infrastructure, sustainable drainage systems in new development and contributions to improved flood defence. Without the Plan,

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<sup>67</sup> DECC (2015) 2005 to 2013 UK local and regional CO<sub>2</sub> emissions full dataset

<sup>68</sup> Gloucester City Council, Gloucester City Climate Change Strategy 2010

development is less likely to adopt a long-term approach to the effects of climate change, and benefits arising from planning gains are less likely to be maximised.

**Water: Resources, Quality and Flooding**

- 3.62 Water resources in the area are managed by Severn Trent Water. The Water Resources Management Plan (WRMP) identifies that over recent years, leakage rates have been reduced to its lowest ever level and water efficiency targets have been exceeded. As a result there is sufficient water resources to meet needs. There are a number of challenges that the area will still face over the next 25 years however, which includes:
- Replacing approximately 85 million litres per day of licensed water abstraction that is no longer environmentally sustainable
  - Meeting the demand for water from the additional 1.6 million people expected to be living in the region
  - Coping with potential lower river flows during dry periods as a result of climate change
  - Ensuring that investment is made at an appropriate rate to address asset deterioration as the network ages.
- 3.63 The WRMP seeks to reduce the overall demand for water and to make the best use of existing resources through a more flexible and sustainable supply system. Actions to achieve this include:
- Reduce waste by driving leakage down
  - Reduce the demand for water, by working in partnership with customers to help them become more water efficient
  - Improving the ability to deploy existing resources flexibly and efficiently
  - Use water trading to make more efficient use of our resources and improve resilience
  - Develop new sources of water when required, with a focus on expanding existing sources first
  - Use proactive catchment management measures to protect our sustainable sources of drinking water supply from pollution risks
- 3.64 Gloucester lies within the Severn Vale catchment, which is part of the wider Severn River Basin District. Within the Severn Vale Catchment there are two operational catchments that Gloucester falls within; Gloucester Tributaries and Severn River and Tributaries.
- 3.65 Within the Gloucester Tributaries operational catchment there are 5 water bodies all of which are of moderate ecological status and good chemical status. One of these water bodies is expected to improve to good ecological status by 2027. The main reason identified for not achieving good status is 'urban and transport'. The GCP is therefore likely to lead to effects on the ecological quality of waterbodies in the Gloucester Tributaries operational catchment.
- 3.66 Within the Severn River and Tributaries operational catchment there are 7 water bodies. 6 of these are of moderate ecological status and 1 is of good

ecological status. All 7 water bodies are classified as good chemical status. Of the six water bodies classified as of moderate status, 3 are expected to improve to good ecological status by 2027. The main reasons identified for not achieving good status are 'agriculture and rural land management' and 'the water industry'.

- 3.67 The Severn River Basin RBMP identifies that within the district the majority of surface waters are classified as of moderate ecological status, and good chemical status. The majority of groundwaters are classified as of good quantitative status and good chemical status. There are also 45 surface water and 18 groundwater Drinking Water Protected Areas that are 'at risk'. There is a Surface Water Safeguard Zone located in the north of Gloucester in which the use of the pesticide Metaldehyde must be carefully managed to prevent pollution of raw water resources that are used to provide drinking water.
- 3.68 Flood risk is high in many parts of Gloucester, particularly around the north, west and south west of the Plan area. Gloucester City is drained entirely by the River Severn, which has both tidal and fluvial influences in the area. Flood Zone maps<sup>69</sup> for the River Severn extend for large distances into the Plan area. The flood risk to Gloucester is predominantly fluvial as the River Severn channel becomes narrower, providing a restriction to high tides moving upstream and river flows moving downstream. The main areas at risk are on the Sud Brook around the Tredworth and Linden areas and on the Whaddon Brook around the Podsmead area. Evidence<sup>70</sup> identifies that initial hydraulic modelling assessments undertaken by the Environment Agency suggest that the raising of defences at certain sites around Gloucester, in particular around Westgate, will deliver the most benefit.
- 3.69 In general the level of flood risk from artificial drainage systems within the Plan area is medium to high. Surface water flooding in Gloucester tends to be associated with poor urban drainage and backing up within urban drainage systems under high river flows. The abundance of impermeable surface can also contribute to surface water flood risk, especially when local intense rainstorms occur. One canal, the Gloucester and Sharpness Canal, is located within Gloucester. There are no recorded incidents of breaches or overtopping, or any other local flood risk instances associated with this canal. There are no records of breaching/overtopping of reservoirs within Gloucester, and no records of groundwater flooding.
- 3.70 The Level 1 SFRA<sup>71</sup> identifies that in the light of climate change, given the lowland setting of Gloucester, an increase in flood extent is expected, but flood waters might also be deeper. This means that the flood hazard is likely to increase over time, creating increased risk to humans, more damage to properties and higher economic damages. Sites currently within Flood Zones 2 and 3 are likely to be subject to more frequent and potentially deeper flooding. Additionally, the tidal section of the Severn might be subject to increased storm surges and wave height.

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<sup>69</sup> Environmental Agency; Flood Map for Planning (from Rivers and the Sea)

<sup>70</sup> Gloucester City Council (2016) Topic Paper: Flooding

<sup>71</sup> Halcrow Group Ltd (2008) Gloucestershire County Council Strategic Flood Risk Assessment Level 1

- 3.71 The most significant changes in the flood depth and extent can be seen in the catchments of the Sud Brook and River Twyver, including the industrial area around the Gloucester Docks, through St Paul's, High Orchard, Barton and Tredworth, and south of Coney Hill. There are a few considerable changes in the Wotton Brook catchment, where properties west of the A38 Tewkesbury Road and those on the border between Elmbridge and Wotton are expected to flood in the future. There is also an area of agricultural land downstream of the A40 at risk. Slight increases in depth and extent of flooding in areas already at risk of flooding from the Daniel and Dimore Brooks are predicted, but not on the same scale as other areas of the Gloucester Streams.
- 3.72 Damages during the one per cent annual probability flood event, increase by 17% to £110 million under the 100-year horizon future scenarios<sup>72</sup>. The scale of damage therefore remains high. The SFRA<sup>73</sup> recommends that the local authority consider using the climate change maps to carry out the Sequential Test, in order to give a particularly long-term risk-based approach to planning.

***Evolution without the Plan***

- 3.73 Development will still come forward without the Plan and will need to be in line with current national and local policies and guidance in relation to the protection of water resources and quality; incorporation of efficiency measures; management of surface water run-off and avoidance of flood risk areas. However, the GCP gives the Council the opportunity to more effectively coordinate development and direct it towards those areas that are potentially less sensitive and have lower risk of flooding. It also provides an opportunity for the Council to set more aspirational requirements for future development in terms of water efficiency standards and the management of surface water run-off and adopt a longer-term risk-based approach to planning in line with recommendations emerging from the Gloucestershire SFRA.

***Soil and Land***

- 3.74 The Housing Monitoring Report<sup>74</sup> identifies that in the period between 1 April 2014 and 31 March 2015 the gross completion figure for new dwellings in Gloucester was 568. Of these completions the majority (388) were located on previously developed (brownfield) land.
- 3.75 DEFRA<sup>75</sup> identifies bands of agricultural land on the outskirts of Gloucester City particularly; to the north around Longford; in the east and south-east around Brockworth; and to the south around Quedgeley and Hardwicke.

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<sup>72</sup> Ibid.

<sup>73</sup> Ibid.

<sup>74</sup> Gloucester City Council (2015) Housing Monitoring Report

<sup>75</sup> DEFRA Magic Map Application [online]

- 3.76 Like many other urban areas in the UK, Gloucester has had a long industrial history, which along with more recent activities, can cause contamination of the ground. In 2009<sup>76</sup> it was identified that nearly 400 site contamination investigation and remediation reports were on file with Gloucester City Council. The contaminated land register<sup>77</sup> identifies that all properties determined on the register as contaminated land (properties at Westend Parade, Alney Terrace, Fair View Caravan Site, and Pool Meadow Caravan Site) have been appropriately remediated.

### ***Evolution without the Plan***

- 3.77 Land and soils are key in the provision of new development, and development can lead to significant effects on the quantity and quality of soil. Development has the potential to result in the loss of best quality soils, and to affect the quality of base and surrounding soils as a result of disturbance or contamination. The GCP can act as a delivery mechanism for the protection of soil quality and appropriate direction of new growth, for example by directing development towards previously developed land where possible, or the appropriate minimisation of risks, for example requiring remediation of contaminated sites where necessary. Without the Plan, there is likely to be a less coordinated approach to the delivery of development. For example, development may not be directed to those areas of lower agricultural land quality.

### ***Biodiversity and Geodiversity***

- 3.78 There are no European designated sites for nature conservation within the Plan area. The closest European sites is the Cotswold Beechwoods Special Area of Conservation (SAC) located roughly 2.5km to the south east of the Plan area.
- 3.79 There are two Sites of Special Scientific Interest (SSSIs); Hucclecote Meadows SSSI is a 5.75ha site located in the east of the City, and Robin's Wood Hill Quarry SSSI is a 1.93ha site located in the south of the City. Both are in favourable condition<sup>78</sup>. Hucclecote Meadows is a series of lowland meadows overlying Lower Lias clays in the Severn Vale on the outskirts of Gloucester. The meadows contain the Priority Habitat of Lowland Neutral Grassland (MG4 and MG5) and represent one of the few remaining areas of such herb-rich ancient pastures in the county, traditionally managed for hay and stock grazing<sup>79</sup>. The Robin's Wood Hill Quarry SSSI forms part of the Robinswood Hill Country Park and provides the best inland section of Lower Jurassic, Middle Lias strata in Britain, with a complete section of the Upper Pliensbachian Stage present. The geology of the site has been intensively studied, particularly the diverse faunas which it yields<sup>80</sup>.

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<sup>76</sup> Gloucester City Council (2009) Contaminated Land - An Inspection Strategy for Gloucester

<sup>77</sup> Gloucester City Council (2016) Public Register of Contaminated Land

<sup>78</sup> DEFRA Magic Map Application [online].

<sup>79</sup> Natural England Designated Sites View [online].

<sup>80</sup> Ibid.

- 3.80 The County area contains a number of locally designated biodiversity and geodiversity sites including; 9 Local Nature Reserves (LNRs), 6 Key Wildlife Sites (KWSs) and 28 other sites of Nature Conservation Interest. The Open Space Strategy<sup>81</sup> identifies that six of the designated Local Nature Reserves are located within Gloucester city. The Gloucestershire Nature Map<sup>82</sup> identifies the strategic connectivity of nature areas at the county level, which are connected through the following habitats:
- Coastal and Floodplain Grazing Marsh
  - Lowland Calcareous (Limestone) Grassland
  - Lowland Meadows (including Traditional Orchards)
  - Wet Grasslands
  - Woodland Mosaic (including Heathland, Acid Grassland and Traditional Orchards)
  - Rivers
  - Severn Estuary
- 3.81 It is evident from this map that there are numerous opportunities to create new connections between existing habitats, to enhance connectivity between river corridors.

#### ***Evolution without the Plan***

- 3.82 Development will still come forward without the Plan and will need to be in line with current national and local policies and guidance in relation to the protection of biodiversity and geodiversity. However, the GCP gives the Council the opportunity to more effectively coordinate development and direct it towards those areas that are potentially less sensitive. It also provides an opportunity to consider and address potential strategic cumulative effects on biodiversity that may not be taken into account at a lower level of plan-making. Development could be directed away from important ecological corridors or perhaps help to improve habitat connectivity, not only within Gloucester but into the surrounding areas.

#### ***Landscape and Townscape***

- 3.83 Gloucester is an urban landscape within the Severn and Avon Vales National Character Area, containing 5 different Landscape Character Types; Settled Unwooded Vale, Floodplain Farmland, Vale Hillocks, Escarpment Outliers, and Unwooded Vale.
- 3.84 Recent / ongoing townscape improvements in Gloucester include<sup>83</sup>:
- Significant public realm improvements between Gloucester Quays and Kimbrose Triangle / Southgate Street
  - Kings Quarter Regeneration Area, including the development of a new bus station (and demolition of the old bus station) and improved linkages

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<sup>81</sup> Gloucester City Council Open Space Strategy 2014 - 2019

<sup>82</sup> [www.gloucestershirenature.org.uk](http://www.gloucestershirenature.org.uk)

<sup>83</sup> Gloucester City Council Promoted Capital Works and Gloucester City Council Officer advice

between bus / rail interchange and the main commercial area, as well as a range of new uses including retail, residential, restaurants and cafes.

- Southgate Street care home scheme, which includes significant public realm improvements to the wider area.
- Pedestrianised areas at St John's Lane, Worcester Street and St Lucy's Garden
- Refurbishment of Gloucester Park
- Improvements to the pedestrian route from St Oswald's Park (Cattle Market) to the City centre (incorporating the redesign of Priory Gardens and part of St Mary de Lode churchyard).
- A new park at Brionne Way in Longlevens
- Improvements to St James Park
- Refurbishment of the open space to the front of At Aldates Church

### ***Evolution without the Plan***

- 3.85 The GCP offers a delivery mechanism for extended protection of key townscape characteristics that contribute to sense of place. The Plan can also coordinate opportunity and investment across the whole of the plan area to ensure that development delivers the best possible, high quality, and multifunctional benefits. Therefore, without the Plan future development has an increased likelihood of resulting in negative effects on townscape character, and a decreased likelihood of delivering coordinated and prioritised improvements.

### ***The Historic Environment***

- 3.86 There are over 700 Listed Buildings and 26 Scheduled Monuments in Gloucester, a significant number of which are located within the City centre. Westgate Street has the greatest concentration, with 79 Listed Buildings, 14 of which are Grade I or Grade II\* Listed. The most recent survey into the condition of these assets in 2013 identified 26 buildings as 'at risk' and a further 17 as vulnerable of becoming so<sup>84</sup>. There are also 14 Conservation Areas, as listed below:

- The Spa
- Southgate Street
- The Docks
- Eastgate & St Michaels
- City Centre
- The Barbican
- Cathedral Precincts
- Worcester Street
- London Road
- Barton Street
- Hucclecote Green
- Hempstead
- Kingsholm

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<sup>84</sup> Gloucester City Council (2013) Buildings at Risk



■ Denmark Road

- 3.87 All trees in a Conservation Area with a trunk diameter of more than 7.5cm, when measured 1.5m from the ground, are protected. There are also two Article 4 directions in force at St Michael's Square and Southgate Street Conservation Areas restricting development that could affect the external appearance of properties in these areas. A Historic Area Grant also exists within the Primary Shopping Area and is used to help owners of properties in a heritage setting to put their buildings into sound repair.
- 3.88 Southgate Street is also subject to the Townscape Heritage Initiative (THI), which is a £1.2 million project to improve this gateway to the City, funded by the Heritage Lottery Fund for five years until 2018. The THI covers an area from St Mary DeCrypt Church, to the southern end of Southgate Street where it meets St Anne's Way. The project offers grant assistance to property owners in the Southgate Street area in order to; reinstate lost architectural detailing; return vacant floor space into beneficial use; enable repairs to the external structure of buildings; and improve the quality and design of the street scene within the City centre.
- 3.89 The City has a rich archaeological heritage, containing remains of national and international importance. As well as Roman and Medieval remains, archaeologists have found evidence of earlier settlement. Remains from the Neolithic period have been recovered from the City centre and Iron Age settlement has been identified in the Kingsholm area and elsewhere.
- 3.90 Evidence<sup>85</sup> suggests that the heritage of the city is a central component in the identity of the city. It defines much of what is locally distinctive about the city and that impacts on how the city's residents and visitors feel, use and perceive the city. It is central to Gloucester's civic pride, status, sense of place and the sense of continuity in times of change.

***Evolution without the Plan***

- 3.91 Without the plan, designated heritage assets would still be protected through National and Local policy; however, undesignated heritage assets, heritage settings and potential archaeology that could be more vulnerable to the impacts of development. The GCP and SA can consider the cumulative effects of proposed development on designated and non-designated heritage assets and their setting. The Plan can thus provide a delivery mechanism for enhanced protection for undesignated assets, settings and features that contribute to the historic environment. It can also secure enhancements for the historic environment, for example in promoting new development that brings derelict buildings back into use, through appropriate investment and contributions and in interpretation and access to the historic environment. With such an abundance of heritage assets in the plan area, the GCP can carefully plan for responsively designed development in the most appropriate locations.

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<sup>85</sup> Gloucester City Council (2016) Topic Paper: Historic Environment

### **Minerals and Waste**

- 3.92 The Gloucestershire Minerals Local Plan<sup>86</sup> identifies that there are drift deposit resources which may contain sand and gravel deposits within Gloucester, however there are no mineral workings in Gloucester. The Plan does however safeguard existing sites for processing minerals in Gloucester, including Nettlebridge Wharfage, Chelmix, Hope, Cemex and Allstones.
- 3.93 Waste management is also coordinated at the County level<sup>87</sup>. Gloucestershire County Council provides strategic services for the whole county including waste planning and disposal, and the six District Councils (Cheltenham, Gloucester, Tewkesbury, Stroud, Forest of Dean and Cotswold) provide more local functions including waste collection. The four main types of waste produced in Gloucestershire are; Municipal Solid Waste (MSW), Commercial and Industrial, Construction and Demolition, and Hazardous waste.
- 3.94 MSW is the waste which is collected by or on behalf of local authorities, and around 90% of this comes from households. In 2009/10 this equated to 294,000 tonnes, which demonstrates a general increase since 2001, however there has been a decline since 2006/7 in which levels peaked at 324,143 tonnes. The largest waste stream in the County is Commercial and Industrial in which 375,000 tonnes were recorded for 2008. The amount of Commercial and Industrial waste managed in Gloucestershire has been more variable over time, with no obvious trend over the last 10 years.
- 3.95 Within Gloucestershire there is one co-mingled Materials Recovery Facility (MRF) at Moreton Valence. Planning permission has also been granted for a similar facility at Wingmoor Farm East however this is not yet operational. There are very few facilities for recyclates in Gloucestershire and as such the majority of recyclates once they have been sorted and bulked are transported out of the county. There is a Household Recycling Centre within Gloucester at Hempsted, as well as local recycling bring banks at Sainsbury's Quays, Sainsbury's Barnwood, ASDA Metz Way and Morrisons Abbeydale, and a Community Recycling Area at Scott Avenue.

### **Evolution without the Plan**

- 3.96 The strategic directions for the ongoing management and future development of waste and minerals facilities and operations are planned for in the Gloucestershire Minerals and Waste Local Plans, and as such already have a guiding framework in place. Although the GCP will have less bearing on this aspect, it will be planning for the future growth of housing and communities. Minerals and waste can affect human health through noise pollution and odour, and as such the GCP provides the opportunity to plan for development that minimises these effects. The GCP can also ensure that new housing and employment development considers the implications of its

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<sup>86</sup> Gloucestershire County Council (2014) Minerals Local Plan Site Options and Draft Policy Framework Consultation Document

<sup>87</sup> Gloucestershire County Council (2012) Waste Core Strategy

waste production and management, to plan for sustainable waste management and support the aims of the Waste and Minerals Local Plans.

### Key Sustainability Issues, Problems and Opportunities

3.97 Key sustainability issues are presented in the Sustainability Appraisal Statement (February 2012), these were identified from Scoping Reports and SA work for the GCT JCS and City Plan. Following the updated review of plans and programmes and baseline information, these key sustainability issues have been reviewed and updated in line with the evidence. Minor amendments were also made for further clarification. The updated key sustainability issues are identified in Table 3.1 below, and an overview of the progression of these issues is provided in Appendix II.

**Table 3.1: Key Sustainability Issues and Opportunities**

Key Sustainability Issues and Opportunities
Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.
A large proportion of the City falls within the River Severn floodplain.
Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings.
Certain areas of the City suffer from traffic congestion and poor air quality.
There is a need to encourage a move away from the dependence on the private car.
There is a need to ensure carbon emissions are minimised.
Previously developed land may be subject to contamination.
The City needs to protect areas of public open space and green corridors/networks, and ensure open spaces are accessible to all.
There are areas of the City that experience high unemployment rates.
There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry.
High levels of in-commuting.
Limited early hours / evening economy.
Need to plan for and protect quality employment land and ensure a future supply.
There are older, less attractive employment areas.
Lack of overnight tourist visitors.
Poor retail provision compared to the size of Gloucester's shopper population.
There are opportunities to connect new employment development with key transport infrastructure projects (e.g. the M5 and Blackfriars to support the growth zone identified in the Strategic Economic Plan, and alongside the new bus station.
There is acute housing 'need' in the City.
'Pockets' of acute deprivation exist in some parts of the City.
There is a significant growth in the population predicted, particularly in the young and working age bands.
Growth in the number of households, in particular single person households.
Educational achievement needs improving.

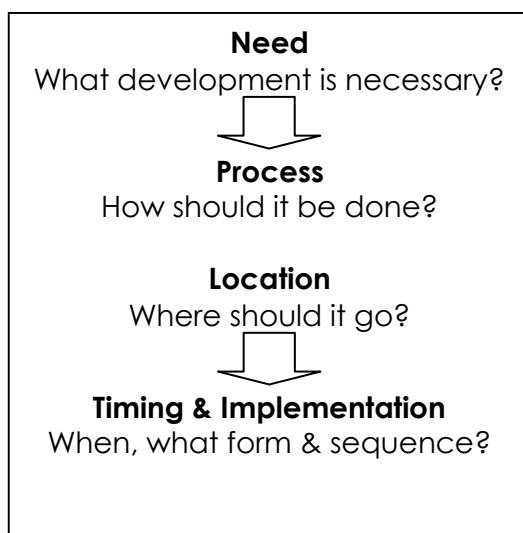
Homelessness
There are inequalities in opportunity across the Plan area.
High levels of obesity in both adults and children.
Adequate protection of cultural heritage.
Localism driving increased local level participation.
Crime and fear of crime.
There are areas of the City that experience high unemployment rates.
There is a national requirement to minimise waste production and the amount of waste sent to landfill.
There is a requirement to maintain and improve the ecological status of the River Basin.

## 4.0 Consideration of Plan-Making Options and Alternatives in SA

### Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive<sup>88</sup> requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance<sup>89</sup> advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan. The NPPF (paragraph 165) requires that a Sustainability Appraisal which meets the requirements of the SEA Directive should be integral to the plan preparation process.
- 4.2 Extant SEA guidance<sup>90</sup> sets out an approach and methods for developing and assessing alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

**Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making**



- 4.3 Recent case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of

<sup>88</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>89</sup> <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

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[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguides\\_ea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf)

spatial and land use plans. The Forest Heath Judgment<sup>91</sup> confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.

- 4.4 The Broadlands Judgment<sup>92</sup> drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment<sup>93</sup> confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report; this was subsequently upheld at Appeal.

### **Assessment of Options in Plan-Making**

- 4.5 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the Councils through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.6 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.
- 4.7 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services and impacts on local landscape, and particularly informed by technical studies such as the

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<sup>91</sup> Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

<sup>92</sup> Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

<sup>93</sup> Cogent Land LLP v Rochford District Council (2012) EWHC 2542

Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), and Strategic Flood Risk Assessment (SFRA). There is a hierarchy of options assessment with sites that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.

- 4.8 The role of the SA is to inform the Councils in their selection and assessment of options; SA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the SA can help with refining and further developing these options in an iterative and ongoing way. The SA findings do not form the sole basis for decision making – this is informed also from planning and other studies, feasibility, and consultation feedback.

### **Options for Accommodating Growth in the Gloucester Area**

- 4.9 Different options for accommodating proposed growth in the Gloucester, Cheltenham and Tewkesbury local authority areas have been considered and variously subject to SA/SEA and consultation since early Joint Study Area studies in 2004-6, through iterations of the emerging Joint Core Strategy 2009-2013 and Submission in 2014, and continuing during the Examination stages 2015-2016.
- 4.10 The approach that has been taken to options identification, refinement and appraisal is explained in the GCT JCS SA Report<sup>94</sup> (sections 4-8, 2014) which accompanied the JCS on submission (November 2014) to the Secretary of State for examination. This includes the SA findings and the reasons for selecting or rejecting alternatives in the JCS area and the Gloucester area itself. Consideration of options was discussed during the Examination of the JCS and this included reflection on the proposed Strategic Site Allocations (Policy SA1) to meet Gloucester's identified need for development. Details are provided in the Inspector's Interim Report<sup>95</sup> (May 2016) and the emerging SA Addendum Report (September 2016) that will accompany the proposed Main Modifications to the JCS on consultation in October 2016.
- 4.11 Doing nothing is not a reasonable alternative for the City Plan since a strategy with locally relevant Policies and local (non-strategic) site allocations are required to avoid negative effects and ensure a sustainable delivery of the required development in the Gloucester area and as identified in the JCS (Policies SP1 & 2).
- 4.12 As explained in the Initial SA Report<sup>96</sup> (2012), there is limited possibility for investigating strategic options through the Gloucester City Plan. The Strategy and Development Principles are underpinned by a City Centre first approach that has developed over considerable time and study with the JCS, including testing through SA. Local development opportunity options were considered

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<sup>94</sup> <http://www.gct-jcs.org/SustainabilityAppraisal/>

<sup>95</sup> <http://www.gct-jcs.org/>

<sup>96</sup> <http://www.gloucester.gov.uk/resident/Documents/Planning%20and%20Building%20Control/CityPlans/usAppraisalDocFinal16032012.pdf>

through public consultation in May – July 2013<sup>97</sup> with the next stage of plan preparation and Sustainability Appraisal. The likely significant effects on sustainable development were assessed by Ward area and summary findings reported including mitigation possibilities for potential negative effects identified. At this time, an invitation was made for further potential options for local development sites for the GCP.

- 4.13 The plan-making process has identified the reasonable options (suitable and deliverable) available for proposed allocation as local sites in the Draft GCP; these have been subject to SA. There remains a requirement to find more local sites to meet the need for the GCP and all reasonable alternatives have been tested through SA and progressed through to the Draft GCP.

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<sup>97</sup> <http://www.gloucester.gov.uk/resident/Documents/Planning%20and%20Building%20Control/City-Plan-Strategy-Consultation-2013.pdf>



## 5.0 Integrated Appraisal of the Draft Gloucester City Plan

### Vision and Objectives

5.1 The Draft GCP identifies the following Vision:

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

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

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

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

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

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

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

5.2 This is supported by Development Principles identified to help deliver this vision. The Principles are as follows:

- |  |
|--|
| 1. To ensure development contributes to the delivery of a transforming City which brings regeneration benefits, promotes sustainable development and makes the most efficient use of brownfield land and buildings |
| 2. To ensure that new development is supported by the necessary infrastructure   |
| 3. To regenerate the City Centre and other areas of the City in accordance with the Council's adopted strategies and maximise benefits associated with Housing Zone status   |
| 4. To develop a City Centre that provides for the needs of the 21 <sup>st</sup> Century, with increased choice, an improved environment and to protect it from inappropriate competition in other locations        |

5. To provide a balanced network of local and district centres that provide for the everyday shops, services and facilities needed by the local community.
6. To provide a balanced mix of new homes that provide for the needs and aspirations of the local community, working with neighbouring authorities where they are providing for housing needs of the Gloucester community.
7. To encourage and facilitate inward and home grown investment, attracting innovative growth sectors, create high and stable levels of economic growth and increases job opportunities.
8. To improve educational attainment, skills and learning opportunities.
9. To protect and enhance the City's leisure, recreation and environmental assets, including valuable heritage, public open space, allotments, areas of nature conservation, sensitive landscapes, playing fields and sporting facilities.
10. To encourage a vibrant and safe evening and night-time economy in the City Centre that appeals to all age groups and encourages more people to stay overnight.
11. To tackle poverty and deprivation in the worst affected areas of the City.
12. To deliver development that achieves high quality design that reduces crime and the fear of crime, builds positively on local distinctiveness and contributes to the creation of an active, connected and sustainable City.
13. To ensure that development minimises its impact on climate change through sustainable construction and design, encourages the use of sustainable forms of transport and integrates with and makes the most of existing infrastructure.
14. To improve health and wellbeing through good design that promotes opportunities for all residents to lead 'activity lives', by providing access to good quality open spaces, playing fields and community facilities, and protecting air quality and residents from pollution and contamination.

- 5.3 The Draft GCP Vision is compatible with nearly all of the IA Objectives, particularly those relating directly to accessibility and reducing the need to travel, the built environment and regeneration, health and wellbeing. There is uncertainty in relation to minimisation of waste as the delivery of new housing is inevitably likely to increase the amount of waste generated within the City. It is recommended that the Vision could be enhanced by including wording that seeks to minimise waste generation and promotes the waste hierarchy.
- 5.4 The Principles were found to be compatible with at least one of all of the IA Objectives, and as such will contribute to sustainable development to a certain extent.
- 5.5 Given the complex inter-relationships between objectives, some uncertainties do exist. For example, the delivery of new housing has the potential to affect flood risk, landscape/townscape and noise and light pollution. Positive effects will be dependent on further objectives that seek to minimise potential negative effect and maximise positive effects. The delivery of new housing is also likely to increase waste generated within the City and as such is considered incompatible with this SA Objective. Some of the GCP Principles are very specific and therefore only relate to certain SA topics, as such these are likely to have a neutral effect on a number of other SA Objectives. It is again recommended that the Principles could be enhanced by including wording that seeks to minimise waste generation and promotes the waste hierarchy.

### Potential Site Allocations

5.6 As Gloucester City Council is unable to meet its identified housing needs, most potential site allocations are required to help contribute to meeting the housing need and as such it is considered that there is a lack of alternatives in this respect. However, there were a number of site options that were included in the City Plan Consultation in May 2013 which have not been carried forward into the GCP Potential Site Allocations 2016. These sites, along with the reasons for rejection are identified in the table below.

**Table 5.1: Reasons for Rejection of Sites Included in City Plan Consultation May 2013.**

Ref	City Plan Ref	Site Name	Reason for not carrying forward into 2016 potential
1	WN1	St Oswalds Road	Partly within Flood zone 3
2	WN5	Hampden Way Car Park	Existing car park, not available
3	WN7	Land at corner Southgate Street and Trier Way	Site developed as elderly care home
4	P1	Former Jet and Whittle	Site developed for residential
5	E1	Bohanam House	Site occupied by a tenant on a long lease with no view of vacating site. As such the site is no longer considered available.
6	B2	Royal Mail	Employment land that will be protected by Employment policies as such does not require allocation
7	B3	Fire Station	Land developed for retail use
8	A1	Land adjacent to Abbeydale District Centre	Not suitable for development. Part flood zone 3 and partly developed as car park for doctors surgery
9	WS13	Land at Rectory Lane	Consent for residential development for one unit. Site considered too small to allocate.
10	KW2	Hare Lane North Car Park	Site considered too small for development
11	KW3	Industrial Units Alvin Street	Site now occupied and therefore no longer available
12	H1	Hucclecote Resource Centre	Site developed for residential
13	MR1	Land at Winnycroft Farm	Site has become a JCS allocation
14	MR2	Land South of Winnycroft Farm	Site has become a JCS allocation
15	Part of WN6	Victoria Dock/Land at Llanthony Warehouse	Site too small. Not considered suitable for residential development.

**SA of Policies: Social, Economic and Environmental**

## Introduction

- 5.7 This section sets out the findings of the Sustainability Appraisal (SA) of the Draft Gloucester City Plan (GCP). It is structured according to 12 key topics which have been linked to relevant SA Objectives as well as SEA Directive topics. The appraisal of each topic has been divided into a number of sub-headings to ensure that each aspect of the emerging GCP is considered, including policies and site allocations, as well as the interrelationships between topics and cumulative effects of the Plan as a whole.
- 5.8 In accordance with the SEA Directive and Regulations any likely significant effects are identified along with any mitigation measures necessary to address significant negative effects.

### Housing

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 18: Ensure the availability of housing land and premises including affordable housing to meet local needs.

Relevant GCP Topics Paper(s): Housing

### Appraisal of Draft GCP Policies

- 5.9 The overall level of housing growth is strategically set by the GCT JCS which seeks to deliver 35,175 new homes during the plan period. Policy SP1 in the Submission JCS (November 2014) sets a housing requirement of 14,359 new homes to be delivered in Gloucester City between 2011 and 2031, with the distribution of development between the three authorities defined further in GCT JCS Policy SP2. Gloucester is unable to meet its full objectively assessed housing needs within the city boundary, and as such the JCS has determined strategic urban extensions on adjacent land which will support the future growth of Gloucester. The urban extensions include areas located to the north, east and south-east of Gloucester in Innsworth and Twigworth, South Churchdown and North Brockworth. The residual needs which will be met within the existing city boundary include a proportion of committed development, the development of a central housing zone, and distributed allocations to meet local area needs. The central housing zone targets the 4 key areas of; the Railway Station & King's Quarter, St Oswalds, the Heart of the City, and Gloucester Quays; which each contain priority sites and identified development sites.
- 5.10 Policies and allocations which deliver new housing have the potential for major long term positive effects on housing. Whilst the overall level of growth is determined by the GCT JCS, the Draft GCP has the opportunity to distribute

the targeted growth within the city boundary to address key local issues such as deprivation, and to seek to achieve synergistic development gains and benefits by delivering housing development alongside key infrastructure and regeneration projects and investments. The identification of the housing zone areas will contribute to coordinated delivery of housing alongside key infrastructure projects (like the new bus station and train station improvements) which is likely to lead to significant positive effects through increased accessibility and high quality public realm enhancements supporting ongoing investment and renewal.

- 5.11 Development within the City should also seek to address specialist housing needs and provide a mix of housing types and tenures, including homes for Gypsy and Traveller communities. The policy framework allows for the development of specialist housing including upper floor residential in the city centre, infill development, intensification, student housing, elderly accommodation and special needs housing, extensions and annexes, and self-build opportunities. Gypsy and Traveller needs were assessed in the GCT JCS which has identified a need to deliver 2 new pitches within the city boundary. GCT JCS Policy SD14 sets the criteria that development must meet in the delivery of Gypsy and Traveller accommodation, and Policy X seeks to retain existing static caravan sites. It is considered that the policy framework in the GCP could be strengthened by identifying the most suitable and sustainable location for the development of extra pitches to meet the needs of the Gypsy and Traveller population. It is noted however, that the forthcoming consultation on the Draft GCP (and this accompanying SA Report) will include a call for sites, which seeks to identify new opportunities for the development of Gypsy and Traveller accommodation.
- 5.12 Affordable housing delivery targets are set in the GCT JCS, and the Draft GCP does not include any further policies relating to affordable housing.

### **Appraisal of Site Allocations**

- 5.13 All of the proposed housing site allocations have the potential for long term positive effects on housing through the provision of residential development. Site allocations 17, 18, 20, 21, 22, 29 and 41 are considered to have the potential for positive effects of greater significance as it/they could accommodate a higher number of new homes. Site allocations 1, 2, 3, 4, 5, 6, 7, 8, 9, 15, 16, 17, 26 and 28 are considered to have the potential for major positive cumulative effects by delivering housing alongside employment and infrastructure development within the targeted housing zones (Greater Blackfriars and the Railway Corridor).

### **Synergistic and Cumulative Effects**

- 5.14 Overall, the GCP will have short to long term positive cumulative effects on housing through the provision of new homes to help meet the objectively assessed need of the Plan area as determined within the GCT JCS. Housing is distributed across the city and policies will ensure that a suitable mix of homes are provided to meet the needs of all people in the future. By targeting key regeneration areas, where housing development can be delivered alongside

employment, retail, service and infrastructure development there is the potential for major long term positive synergistic effects, through connected spaces, new green infrastructure network connections, and public realm enhancements which can attract continued investment and renewal.

### **Interrelationships with other Topics**

- 5.15 The provision of housing and associated delivery of services and facilities also has the potential for indirect positive effects on a number of other topics, which include economy and employment, health and equalities, and transport and accessibility. Conversely, the delivery of housing also has the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change, water resources, water quality, flooding, the natural environment, cultural heritage and waste and recycling.

## **Economy and Employment**

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 12: Ensure the availability of employment land and premises to secure future prosperity potential.
- SA Objective 13: Support the economy by helping new and existing businesses to fulfil their potential.
- SA Objective 14: Support the vitality and viability of the city centre as a retail, service, leisure and learning destination whilst also supporting local centres that support local needs.
- SA Objective 24: Support the development of accessible education, skills and learning to meet the needs of both employers and the working population.

Relevant GCP Topics Paper(s): Economy and Employment, Retail and City/Town Centres

### **Appraisal of Draft GCP Policies**

- 5.16 Policy SP1 in the GCT JCS plans for the delivery of new employment land to support around 39,500 new jobs. Policy SD2 supports economic development within the identified strategic allocations in the GCT JCS, as well as within Gloucester, Cheltenham and Tewkesbury town. GCT JCS Policy SD3 further requires Local Plans to provide for the delivery of new retail floor space in existing designated centres; for Gloucester this equates to 42,000m<sup>2</sup> of new comparison goods retail space to be delivered over the plan period to 2031.
- 5.17 The delivery of new employment land has the potential for major long term positive effects on the economy by helping to meet the employment needs of the Plan area. The GCP seeks to concentrate the majority of new

employment and retail development within the central area, which can support the vitality and viability of the city centre, with the potential for long term positive effects. A focus on mixed-use and commercial development in the central Housing Zone will support targeted regeneration in this area, and deliver synergistic gains like public realm improvements, which can indirectly lead to long-term major positive effects on the economy by attracting new and ongoing investment and renewal.

- 5.18 The GCP (Policy B4) asserts a preference for office development within the City centre, and Policy C1 requires development to adopt a sequential approach where city centre sites are prioritised over edge of centre and out of centre locations. As the city centre provides the main public transport hubs this will support easy access to employment opportunities with the potential for minor long term positive effects on the economy and employment.
- 5.19 Policy B5 allows for employment development (other than office development) that will enhance provisions or diversify B Use Class (business, general industrial and storage or distribution) employment. The Policy provides the flexibility to allow opportunities outside of the city centre to arise (for example extensions to existing sites in local centres), without significantly affecting the vitality of the city centre, with the potential for long term positive effects.
- 5.20 The GCP protects key employment area commitments and new employment spaces, and restricts the loss of existing employment areas through redevelopment or change of use. Policy B4 criteria requires proposals to demonstrate through active marketing that existing office space is no longer suitable or viable for any business use prior to its loss. This policy mitigation will ensure that no significant negative effects arise on the economy through the direct loss of employment land.
- 5.21 The GCP recognises the tourism potential of Gloucester and policies seek to enhance existing tourism / cultural facilities, including support for appropriate development of visitor attractions, overnight accommodation and a major cultural venue. The policies support the growth of the tourism industry with the potential for minor long term positive effects on the economy. It is considered that the policies could be enhanced by identifying existing tourism / cultural venues / sites and protecting these sites against development in a manner according to their significance.

**Suggestion:** It is suggested that Policies (e.g. Policy C3) are updated to identify the key existing tourism and cultural venues / sites that require protection. It is also recommended that a Policy is included which seeks to enhance education and training opportunities in line with SA Objective 24.

### **Appraisal of Site Allocations**

- 5.22 The employment site allocations have the potential for long term positive effects on the economy through the provision of new employment land. Allocations of over 1ha are considered to have positive effects of greater significance given the larger scale of development. Sites allocated within the

central regeneration areas are also considered to have positive effects of greater significance given that development would be well connected to the central area infrastructure, services and facilities and easily accessible by existing public transport routes, which will support access to employment opportunities for local residents.

### **Synergistic and Cumulative Effects**

- 5.23 Overall the policies contained within the Draft GCP seek to deliver the identified employment growth needs (including retail growth), protect and enhance existing employment areas, and restrict the loss of existing employment areas with the potential for minor to major long term positive cumulative effects.

### **Interrelationships with other Topics**

- 5.24 The provision of new employment land has the potential for indirect positive effects on health and equalities, and transport and accessibility. However, there is also the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change and flooding, water resources, water quality, flooding, natural environment, cultural heritage and waste and recycling. The potential indirect effects are mitigated by other GCP policies which have been identified in the relevant topic sections.
- 5.25 A significant aspect of the GCP is the planned and targeted continued regeneration of the central area and historic core of the city. It is considered that the Draft GCP could include policy interventions or an overarching development brief to secure / maximise the potential benefits arising from the delivery of new growth in this zone. A comprehensive high level development brief could better promote the employment opportunities and seek coordinated development gains that maximise the potential for synergistic positive effects spanning across various topics. For example: public realm and townscape improvements, improved permeability, access and signage, interconnected green/open spaces and recreational opportunities, the delivery of public art and cultural enhancements and improved community engagement and historic environment appreciation.

**Recommendation:** A high level comprehensive development brief for the targeted housing / regeneration zone that maximises the potential for coordinated development gains.



## Health and Equalities

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 16: Reduce inequalities in wellbeing and opportunity.
- SA Objective 17: Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities.
- SA Objective 19: Minimise development on open space and green spaces.
- SA Objective 20: Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible locations.
- SA Objective 21: Reduce crime and fear of crime
- SA Objective 22: Encourage everyone to participate in local decision making.

Relevant GCP Topics Paper(s): Health and Wellbeing, Infrastructure Delivery, Housing, Economy and Employment, Retail and City/Town Centres, Sustainable Transport, Natural Environment, Climate Change, Flooding and Water Management.

### Appraisal of Draft GCP Policies

- 5.26 Development has the potential to affect health and equalities in a number of different ways. The GCP seeks to deliver the housing and employment needs as identified within Policies SP1 and SP2 of the GCT JCS, which has the potential to have minor negative effects in the short term on health and wellbeing during construction through increased levels of noise, light and air pollution. However, it is considered that there are suitable mitigation measures provided, through policies (D10, D11 and D12) and available at the project level, to address short-term negative effects during construction (these policies also ensure new development is not located within areas subject to air quality, noise and odour constraints). The policies directing new growth also have the potential for indirect long term minor positive effects on health and equalities by meeting the needs of residents, improving accessibility to housing and employment as well as associated services and facilities.
- 5.27 The overarching strategic development framework provided through the GCT JCS seeks to deliver mixed and balanced communities, directing development to deliver an appropriate mix of dwelling sizes, types and tenures, including provisions for Gypsy and Traveller communities. GCT JCS Policy SD13 further seeks to deliver affordable housing as a percentage of new development, which will increase access to new and decent homes for the residents of Gloucester and thus support increased health and wellbeing.
- 5.28 The GCP further supports the delivery of balanced communities through housing policies which seek to meet locally specific constraints and opportunities, including the use of upper floors in the city centre as residential,

infill development, intensification, extensions, student housing, specialist housing (e.g. for the elderly), and self-build housing, with the potential for minor long term positive effects. The GCP can deliver further local benefits by targeting local scale development in areas where barriers to housing, employment, and services and facilities are highest. Planned and targeted growth can thus contribute to reducing inequalities with the potential for major long term positive effects.

- 5.29 Development can also support healthy and active communities through the delivery of networks of open and green space, and attractive and safe streets and pedestrian walkways / cycle paths which connect to local services and facilities. Coordinated development can deliver direct health benefits (e.g. increased levels of walking / cycling), and support a modal shift that can contribute to long term climate change mitigation and indirectly support health and wellbeing through healthy functioning ecosystems. Given the urban and built up nature of Gloucester, the GCP has significant opportunities to deliver health benefits in this respect. The policies contained within the Draft GCP seek to retain, enhance and improve access to open space; however, it is considered that the policy framework could be strengthened by seeking to improve the connectivity between these areas to promote a network of connected recreational spaces. It is considered that this is more likely to promote synergistic effects (for example connected spaces along waterways creating attractive routes for jogging and recreational cycling) in line with the Gloucester Open Space Strategy<sup>98</sup>. Policies D1 and D3 support active design and strategic connectivity to promote walking and cycling. Policy D4 further requires allotment provisions which can contribute to healthy lifestyles. These policies are considered likely to lead to long term positive effects on health and wellbeing.

**Recommendation:** The SA recommends that the draft Policy includes wording to improve connectivity between open and green spaces. This will enhance positive effects on health and well-being in the longer-term.

### Appraisal of Site Allocations

- 5.30 Site allocations 20, 25, 30, 33, 39 and 44 were assessed as having the potential for minor to major negative effects on health and wellbeing, as they are not located within reasonable walking distance to health facilities and/or promoted walking routes. All of the site allocations, apart from site option 1, are located within 800m of green/open space with the potential for a minor long term positive effect on health and wellbeing. As the appraisal has identified however that the majority of the sites are well connected with existing spaces, it is considered that policy wording could be enhanced by a requirement for qualitative enhancements to existing spaces, when quantitative provisions are unnecessary. Development at site option 30 could also result in the loss of existing health facilities with the potential for a major negative effect. Site allocations 1, 2, 3, 4, 7, 12, 17, 20, 22, 28, 29, 37 and 44 are located adjacent to a railway line or A-road with the potential for minor negative effects on the amenity of future residents, however it is considered

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<sup>98</sup> Gloucester City Council (2014) Open Space Strategy 2014 - 2019

that suitable mitigation is provided through the GCT JCS and Draft GCP to ensure that there will be no significant negative effects with the potential for a residual neutral effect. Mitigation includes Policy D11 on Noise, Policy D12 on Pollution and Policy D14 on the Cordon Sanitaire area. The proposed site allocations that are closer to existing facilities/services and sustainable transport modes are more likely to have positive effects on health and equalities. A number of the proposed site allocations are located within areas with the highest deprivation levels in respect to barriers to housing. This targeted growth can support a reduction in inequalities in the Plan area, and support ongoing investment and renewal in these areas, with the potential for major long term positive effects.

**Recommendation:** The SA recommends that the draft Policy includes wording that further seeks qualitative enhancements to existing open/green spaces.

### **Synergistic and Cumulative Effects**

- 5.31 The Draft GCP supports the delivery of new housing and employment growth set out in the GCT JCS to meet the needs of all residents. The GCP also supports development that will improve community facilities and local services and improve access to outdoor sports and recreational opportunities. Cumulatively the GCP can contribute to reducing inequalities and enhancing opportunities within the Plan area, by strategically targeting this growth, with the potential for major long term positive effects. As identified in the policy appraisal above, there is also the potential for synergistic effects through the promotion of connected recreational spaces, and it is recommended that the GCP seeks to adopt this approach.

### **Interrelationships with other Topics**

- 5.32 Health and equalities can be indirectly affected by the nature and significance of effects on the majority of other topics. Positive effects on housing, employment and transport and accessibility can lead to indirect positive effects on health, equalities and communities. Air quality, water resources, water quality, flooding, biodiversity and natural resources, waste, and cultural heritage can also either positively or negatively indirectly affect health. Policy mitigation to reduce negative effects on these topics (and thus reduce the indirect effects on health) are discussed under the relevant topic heading.

## Transport and Accessibility

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 6: Reduce the need to travel and maximise the use of sustainable modes of transport.

Relevant GCP Topics Paper(s): Sustainable Transport, Health and Wellbeing, Design

### Appraisal of Draft GCP Policies

- 5.33 The delivery of the growth proposed through the GCT JCS has the potential to increase the number of road users and thus traffic, with the potential for negative effects on this topic. The nature and significance of the effects on traffic is ultimately dependent on the location and scale of site allocations. The potential sustainability effects of the proposed site allocations on this topic are discussed in more detail below.
- 5.34 Gloucester City is predominantly an urban area with a well-established highways and movement network which includes cycle paths, bus services, a bus station and a train station. In this respect there are opportunities to deliver new housing and employment development in locations with good access to sustainable transport modes. This will encourage a modal shift with the potential for long term positive effects. Similarly, the location of new development in close proximity to services, facilities and employment options will reduce the need to travel with the potential for long term positive effects.
- 5.35 GCT JCS Policy INF1 requires development to provide safe access to the transport network, and to enable travel choice, which includes access to walking, cycling and passenger transport networks. GCT JCS Policy INF2 also requires development to assess the impacts of proposals on the transport network to include congestion, safety, noise and atmospheric pollution impacts. This policy mitigation should ensure that development does not lead to any significant negative effects, and the promotion of travel choice has the potential for minor long term positive effects by encouraging a modal shift.
- 5.36 The Draft GCP enhances the mitigation available for potential negative effects, requiring active design in Policy D1 which encourages walking and cycling, and Policy D3 which requires development to meet the highest standards of accessible and inclusive design. Policy H1 also seeks close working with the County Council and other organisations to deliver transport infrastructure improvements. It is considered that sufficient mitigation is provided through the GCT JCS and Draft GCP policies to ensure that there will be no significant negative effects on this topic. The promotion of active design and increased accessibility is considered to have the potential for minor long term positive effects against this topic.

### Appraisal of Site Allocations

- 5.37 The appraisal of the site allocations found that the development proposed is unlikely to lead to any significant negative effects on this topic. It is noted that transport modelling evidence is unavailable at this stage, and as such the capacity of site is used to judge the potential level of effects. Those sites with a higher capacity (over 100 dwellings or 1ha of employment land) are considered to have the potential for effects of greater significance. Mitigation provided through GCT JCS and Draft GCP policies should ensure that effects are not significant. The majority of the sites were considered to have the potential for positive effects of varying significance in relation to access to sustainable transport. All sites are located within 800m of a bus stop, and within 800m of Public Rights of Way (PRoW), and the majority of sites are located within 800m of national cycle routes. Those sites that were also located within 800m of the central train station (as well as bus stops, PRoW and cycle routes) were considered to have the potential for positive effects of greater significance. It should also be noted that the assessment will be updated to reflect the findings of transport modelling when this evidence emerges and this should remove uncertainties arising from the information gaps.

### Synergistic and Cumulative Effects

- 5.38 The Draft GCP supports the delivery of new housing and employment growth as set out in the GCT JCS. This has the potential to increase levels of traffic and have negative effects on this topic. It is considered that suitable mitigation is provided through the GCT JCS and Draft GCP policies outlined above to ensure that there will be no significant negative cumulative effects on traffic. The policies seek to encourage a modal shift, by reducing the need to travel as well as increasing travel choice, and the site allocations support this through appropriate siting in accessible locations. This has the potential for long term positive cumulative effects. Potential enhancements to the transport network, including enhancements as a result of development gains is considered to have the potential for minor long term positive cumulative effects also.

### Interrelationships with other Topics

- 5.39 Positive effects on transport and accessibility can lead to indirect positive effects on health and equalities, air quality, climate change and water quality. Similarly, negative effects on transport and accessibility can also lead to negative indirect effects on these topics. It is considered that suitable mitigation is provided through the GCT JCS and Draft GCP to ensure the negative effects on transport and accessibility are not significant, and thus will not lead to significant indirect effects.

## Air Quality

SEA Directive Topics: Air

Relevant SA Objectives:

- SA Objective 11: Improve air quality, reduce noise and light pollution and reduce the amount of contaminated land.

Relevant GCP Topics Paper(s): Sustainable Transport, Health and Wellbeing, Design

### Appraisal of Draft GCP Policies

- 5.40 As identified in the baseline information, the main source of atmospheric pollution in Gloucester arises from traffic on the roads, and there are three designated Air Quality Management Areas (AQMAs) within Gloucester City. Development therefore should seek to reduce traffic levels by; promoting access to and increased usage of sustainable modes of transport, and by increasing access to services, facilities and employment opportunities to reduce the need to travel. The nature and significance of effects with regards to air quality are closely linked to the appraisal for traffic, transport and accessibility, which found that there are not likely to be any significant negative effects on traffic as a result of the proposed development.
- 5.41 The GCT JCS provides mitigation to reduce potential negative effects on air quality. GCT JCS Policy SD4 requires development proposals to demonstrate that they are avoiding unnecessary pollution of air, while Policy SD15 seeks to protect and improve environmental quality, reiterating the requirements of Policy SD4 but also considering cumulative effects. This is supported by the transport and accessibility policies as outlined in the transport and accessibility policy appraisal above (e.g. Policy INF1 in the GCT JCS and Policy D3 in the Draft GCP). The potential negative effects are also mitigated by Policy PD4 in the Local Transport Plan 3<sup>99</sup> (LTP3) which seeks to work with the District Councils to improve air quality.
- 5.42 The Draft GCP does not repeat the policies contained within the GCT JCS or LTP3, but it does seek to ensure through a number of policies that the environmental impacts of development are minimised. This includes Policy G12 seeking to achieve high quality design that positively contributes to climate change mitigation and adaptation, and Policy D10 which seeks to reduce air pollutants in localised sources and requires air quality assessments where appropriate. Given these findings, alongside the findings of the appraisal for transport and accessibility it is not considered likely that the Draft GCP will have significant negative effects on air quality.

### Appraisal of Site Allocations

<sup>99</sup> Gloucestershire's Local Transport Plan 2015-2031 – Overarching Strategy

- 5.43 As the main source of atmospheric pollution in Gloucester City is related to transport, the SA Framework has identified that the effects against SA Objective 6a (traffic) are considered to lead to indirect effects of the same nature and significance on the topic of air quality. Please therefore refer to findings under the transport and accessibility topic.

### **Synergistic and Cumulative Effects**

- 5.44 It is considered that significant negative effects on air quality are unlikely as a result of the Draft GCP. GCT JCS and Draft GCP policies seek to address the impacts of proposed development on the highway network and improve active travel / sustainable travel access and choices. Given the urban nature of Gloucester City and its relatively high level of modal and transport connectivity it is considered that the Draft GCP has the potential for indirect positive cumulative effects by delivering development in accessible locations, and encouraging a modal shift. Mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative cumulative effects on air quality.

### **Interrelationships with other Topics**

- 5.45 Air quality is closely linked with transport and accessibility as increased levels of traffic can result in increased levels of atmospheric pollution. Poor air quality has the potential for indirect long-term negative effects on health, climate change and the natural environment / ecosystems. Alternatively, when air quality is improved, this has the potential for indirect positive effects on the same topics. It is considered that there is sufficient mitigation provided through GCT JCS and Draft GCP policies to ensure that there will be no significant negative effects on air quality, and thus there is unlikely to be any significant negative indirect effects on other topics as a result.

## **Climate Change**

SEA Directive Topics: Climatic Factors

Relevant SA Objectives:

- SA Objective 2: Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources.
- SA Objective 3: Improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change.
- SA Objective 15: Integrate sustainable construction principles and standards into all development schemes.

Relevant GCP Topics Paper(s): Climate Change, Design

### **Appraisal of Draft GCP Policies**



- 5.46 The growth and development proposed through the GCT JCS and delivered through the Draft GCP has the potential to negatively affect climate change by:
- Increased atmospheric pollution as a result of increased road users and increased traffic
  - An increase in demand and supply of energy from unsustainable sources, in the short term through construction and in the long term through occupation/operation
  - An increase in impermeable surfaces which can contribute to flood risk
  - A loss of green infrastructure supporting healthy functioning ecosystems
- 5.47 Flooding has been considered in the Water Resources, Water Quality and Flooding section of this report. The loss of green infrastructure is considered in the Biodiversity and Health and Equalities sections of this report. The effects of increased traffic on the roads are considered within the Transport and Accessibility and Air Quality sections of this report. These topics identify that given the mitigation provided through the GCT JCS and Draft GCP, development is unlikely to lead to any significant negative effects on flood risk (from all sources), green infrastructure networks and air quality.
- 5.48 There is the potential for minor negative effects on climate change through the inherent embodied energy in construction and maintenance of development. Over the life of the Plan technologies are likely to continue to improve and reduce the amount of embodied energy used; however, this remains a little uncertain at this stage.
- 5.49 All development proposals will need to accord with the sustainable design and construction principles contained in GCT JCS Policy SD4. The GCT JCS also supports proposals for the generation of energy from renewable resources or low carbon energy development (Policy INF6). This is further supported by Draft GCP Policies G16 and F8 which seek to exploit the renewable energy potential for the River and Canal and to deliver extra insulation and efficiency measures where renewable/low carbon generation is not practical or viable in development. Policy F10 explicitly states that development will be expected to mitigate against the impacts of climate change particularly through the provision of trees, green roofs, green open spaces and sustainable drainage systems.
- 5.50 The policy mitigation provided through the GCT JCS and Draft GCP is considered sufficient to ensure that development will not lead to any significant negative effects on climate change mitigation and adaptation. The Draft GCP further requires development to deliver provisions (particularly green infrastructure provisions) which will contribute to healthy functioning ecosystems with the potential for minor long term positive effects on climate change.

### **Appraisal of Site Allocations**

- 5.51 The SA Framework has considered that all site allocations have the potential to meet energy efficiency standards, using sustainable design and



construction methods and principles, with the potential for minor positive effects on climate change mitigation and adaptation.

- 5.52 The appraisal of site allocations has found that although the majority of the sites have the potential for minor negative effects on traffic and the highways network, and subsequently air quality, given the capacity of the sites, the mitigation provided through GCT JCS and Draft GCP policies should reduce the extent of these effects, with the potential for a residual neutral effect at most site allocations. Development within the housing zones (Greater Blackfriars and the Railway Corridor) and at site allocations 18, 20, 22, 29, 41 and 44 were considered to have the potential for residual minor negative effects given the higher capacity of these sites, and are thus considered to have the potential for indirect negative effects for air quality and therefore climate change. The Draft GCP also seeks to increase access to sustainable modes of transport and encourage a modal shift which will contribute to reducing the extent of these effects.
- 5.53 Site allocations located on greenfield land are considered to have the potential for severance of green infrastructure. Research has also demonstrated that brownfield sites can support a wide range of habitats and species<sup>100</sup> and thus have significant biodiversity values and it is recommended that Phase 1 Habitat Surveys are undertaken at early stages on brownfield sites to identify their biodiversity value and the required level of mitigation if necessary. The site allocations therefore are all likely to contribute to healthy functioning ecosystems and long term climate change mitigation. GCT JCS and Draft GCP policies should ensure that development at any of the sites will not result in any significant negative effects on biodiversity, and thus reduce the extent of potential indirect cumulative negative effects on climate change in the long term.

### **Synergistic and Cumulative Effects**

- 5.54 Overall the proposed development in the Draft GCP is likely to lead to minor indirect cumulative negative effects on climate change through the likely increase in road users and associated negative effects on air quality. The overall loss of greenfield land and severance of green infrastructure may also lead to minor indirect cumulative negative effects on climate change. Mitigation provided through the Draft GCP however seeks to avoid habitat fragmentation, deliver new green infrastructure in development, and supports a modal shift by increasing access to sustainable modes of transport. These measures will contribute to reducing the extent of the identified cumulative effects.

### **Interrelationships with other Topics**

- 5.55 The nature and significance of the effects on climate change and flooding is closely linked to housing, employment and transport. Flooding is also closely linked to communities and human health as well as water quality, water supply, landscapes, energy supply, the historic environment and the

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<sup>100</sup> TCPA (2004) Biodiversity by Design – A guide for sustainable communities

economy. The mitigation provided through the Draft GCP should ensure that effects in these topics (discussed in the relevant sections) are not significant, and will not significantly indirectly affect climate change.

## **Water Resources, Water Quality and Flood Risk**

SEA Directive Topics: Water

Relevant SA Objectives:

- SA Objective 4: Reduce water use and conserve and improve the quality of water bodies in the Plan area.
- SA Objective 5: Protect floodplain from development likely to exacerbate flooding problems from all sources.

Relevant GCP Topics Paper(s): Flooding and Water Management

### **Appraisal of Draft GCP Policies**

- 5.56 Development proposed in the GCT JCS and supported in the Draft GCP has the potential to have negative effects on water resources and water quality through increased abstraction and increased waste water. Development also has the potential to decrease water quality through increased surface water run-off and the associated polluting effect. The baseline information has highlighted that the water resource zone has sufficient water resources to meet needs from proposed development growth and therefore, there will be no significant effects from proposed development on water resource quantities. The quality of a number of waterbodies in the Gloucester Tributaries catchment however are not achieving European objectives for good ecological water quality status due to effects from urban and transport activities.
- 5.57 The GCT JCS requires development proposals to demonstrate that there will be no unnecessary harm to the water environment as a result of development and that any proposals must meet national standards (Policy SD4). Where possible, the GCT JCS states that the authorities will encourage proposals to exceed these standards. GCT JCS Policy SD4 requires proposals to demonstrate that development is designed to use water efficiently, will not adversely affect water quality, and will not hinder the ability of a water body to meet the requirements of the Water Framework Directive. This provides strong protection for water quality objectives and should mitigate for any potential negative effects.
- 5.58 Policy F7 and F10 within the Draft GCP encourage the use of sustainable drainage systems which protect the quality of the receiving watercourse and groundwater, and Policy F7 further requires large scale development to provide betterment of 20% on the calculated greenfield run off rate, and to contribute to new flood defences along the River Severn where appropriate. Increased recreation, for example, from additional boats, associated with the

proposed development in the Docks area has the potential for pollution of water but mitigation is provided by JCS Policy SD4. Renewable energy development associated with the river is supported in Policy F8, which has the potential to affect water levels, however it is considered that suitable mitigation is provided through GCT JCS Policy SD4 and Draft GCP policies to ensure that development will not lead to any significant effects. It is not considered that development proposed through the GCP is likely to have a significant negative effect on water quality or resources given the mitigation available.

- 5.59 Flood risk poses a significant constraint for development in Gloucester and the GCT JCS provides policy mitigation for flood risk, advocating avoidance, sequential testing (Policy INF3) and protection against displaced effects in the wider catchment. Where there is the potential to exacerbate flood risk, the policy requires a flood risk assessment. This is reiterated in the GCP Policy F7 which rejects development that will be subject to flood risk or will lead to increased flood risk elsewhere. The policy mitigation provided should ensure that there will be no significant negative effects on flood risk.

### **Appraisal of Site Allocations**

- 5.60 The appraisal of the site allocations found that the majority of the sites have the potential for a neutral effect on water quality. There exists an element of uncertainty for sites adjacent to water courses until project level details arise, however, mitigation provided through the GCT JCS and Draft GCP should ensure that any potential negative effects are not significant. A number of the site allocations are located within the Surface Water Safeguard Zone, however it is considered that suitable mitigation, including the use of Sustainable Drainage Systems, is provided through the GCT JCS and Draft GCP policies to ensure that there will be no significant negative effects on this resource.
- 5.61 Site allocations 1, 3, 13, 23, 28, 40 and 45 were identified as located wholly or predominantly in a flood risk area, where mitigation may be difficult and/or expensive with the potential for minor to major long term negative effects against this topic. A number of the site allocations were also located partially within a flood risk area, however, it was considered that development could avoid these areas on site with the potential for a residual neutral effect.

### **Synergistic and Cumulative Effects**

- 5.62 Overall, the Draft GCP is not considered likely to have any significant cumulative effects on water resources, water quality or flood risk. Mitigation provided through the NPPF, GCT JCS and Draft GCP will protect the water environment and encourage the inclusion of water efficiency measures and sustainable drainage systems, as well as the provision of necessary infrastructure (including contributions to improved flood defences where appropriate).

### **Interrelationships with other Topics**

- 5.63 Flooding can directly negatively affect housing, the economy and employment, water quality, water resources, energy supply, transport networks, biodiversity, cultural heritage and health. Water quality and resources are also closely linked to biodiversity and health, with the potential for both positive and negative effects.

## Landscape

SEA Directive Topics: Landscape

Relevant SA Objectives:

- SA Objective 8: Protect and enhance landscape character.
- SA Objective 9: Protect and enhance the distinctive townscape quality and historic heritage and its setting.

Relevant GCP Topics Paper(s): Natural Environment, Design

### Appraisal of Draft GCP Policies

- 5.64 The delivery of new housing and employment development has the potential to both negatively and positively affect townscape character and settings, as well as important views and vistas. Gloucester is located adjacent to the Cotswolds AONB, and as such, development has the potential to negatively affect the setting of the AONB.
- 5.65 The GCT JCS seeks to mitigate potential negative effects on the landscape. GCT JCS Policy SD7 seeks to protect landscape character, local distinctiveness (including types, patterns, and features that make a significant contribution to character, history and setting), and visual sensitivity. GCT JCS Policy SD8 requires development in or adjacent to the AONB to conserve, and where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Further mitigation to protect and enhance the AONB landscape is provided through policies contained within the Cotswolds AONB Management Plan. The policy mitigation provided through the GCT JCS and Cotswolds AONB Management Plan will ensure that development within Gloucester City does not detract from the AONB or its setting.
- 5.66 The Draft GCP provides further mitigation for potential negative effects. Policy L1 requires Landscape & Visual Impact Assessment in development proposals of over 10 dwellings, and seeks to ensure that special landscape qualities are retained and safeguarded. Policies F2 and F4 further seek to protect existing trees, hedgerows and watercourses, as well as encourage new planting. New planting and landscape enhancements are considered to have the potential for minor long term positive effects on landscapes.
- 5.67 Design policies within the Draft GCP seek high quality materials and finishes in development, which are locally distinctive and respond to the positive

character and appearance of Gloucester (Policy G3). They also require landscape schemes to accompany development proposals (Policy G4) and seek townscape improvements through high quality design, public realm enhancement, and public art (Policies G12, G7 and G8). Policy G17 also seeks to protect key views of the Cathedral and other historic places of worship identified and protected in the Heights of Buildings SPD, which will ensure that development does not lead to any significant negative effects on important views and vistas.

- 5.68 The policy mitigation provided through the GCT JCS and Draft GCP is considered sufficient to ensure that development in Gloucester City will not lead to any significant negative effects. Policies that encourage townscape improvements are considered to have the potential for minor long term positive effects.

### **Appraisal of Site Allocations**

- 5.69 In the absence of key evidence (Townscape Sensitivity Study), the assessment of effects on the landscape has been based on the nature of the site as greenfield or brownfield land, and whether development could regenerate buildings that currently detract from the landscape (e.g. empty/redundant buildings). It should also be noted that the assessment will be updated to reflect the findings of the Townscape Sensitivity Study when this evidence emerges and this should remove uncertainties arising from the information gaps.
- 5.70 The assessment found that 26 of the site allocations could contribute to improving townscape character through the redevelopment of brownfield land and high quality design, with the potential for minor long term positive effects on landscapes. Site allocations that would result in the loss of greenfield land are considered to have the potential for minor long term negative effects on landscape through development in a previously undeveloped area. Given the distance of the sites from the AONB, development at any of the site allocations is not considered likely to affect the setting of the Cotswold AONB.

### **Synergistic and Cumulative Effects**

- 5.71 Given the policy mitigation provided through the GCT JCS and Draft GCP, the development proposed is considered unlikely to lead to any significant negative cumulative effects on the landscape. There is the potential for minor cumulative negative effects through the loss of greenfield land which will inevitably change the landscape to some degree through development in a previously undeveloped area. The appraisal has identified significant potential for positive townscape improvements at individual site allocations, which can lead to long term positive cumulative effects on townscape.

### **Interrelationships with other Topics**

- 5.72 The landscape is influenced by and affects a number of the topics considered through the SA. Potential negative effects on the water

environment, air quality, biodiversity, heritage and soil can also have indirect negative effects on the landscape. Changes to the landscape can affect communities, health, heritage and biodiversity both positively and negatively. It is considered that policy mitigation is sufficient to ensure that there will no significant indirect negative effects.

- 5.73 A significant proportion of the development proposed through the Draft GCP is located within the central area of Gloucester, which is also the historic core with significant designated and non-designated heritage assets. It is considered that the townscape setting and the setting of heritage assets in this respect are intrinsically linked - effects on heritage settings are likely to lead to indirect effects on landscapes and vice versa. Potential effects on the setting of designated and non-designated heritage assets are discussed in the Cultural Heritage section, and are not considered likely to be significant, and thus are unlikely to lead to significant indirect effects on landscapes.

## **Biodiversity**

SEA Directive Topics: Biodiversity, Flora and Fauna

Relevant SA Objectives:

- SA Objective 1: Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest.

Relevant GCP Topics Paper(s): Natural Environment

## **Appraisal of Draft GCP Policies**

- 5.74 The Plan area contains a number of local biodiversity designations (including a Nature Improvement Area) and two nationally designated SSSIs.
- 5.75 Given the SA findings for other topics such as transport, air quality, water resources and water quality, it is considered unlikely that there will be any major negative effects on biodiversity as a result of increased pollution. Whilst there is the potential for negative effects through the loss of habitats as a result of the location of development, this is more appropriately addressed through consideration of specific site allocations.
- 5.76 One of the key negative effects likely to arise as a result of development is related to the overall loss and fragmentation of habitats. Important habitat corridors should be protected and maintained as the connectivity of habitats is important for the long-term integrity of biodiversity.
- 5.77 Mitigation is provided through the GCT JCS. Policy SD10 seeks to protect European, nationally and locally designated sites for biodiversity and geodiversity from unacceptable negative effects. It also encourages new development to:

- Contribute positively to biodiversity
- Create links with wider networks of green infrastructure
- Create or restore priority landscapes, priority habitats and populations of priority species

5.78 This is supported by Draft GCP Policy F2 which seeks to resist small scale piecemeal erosion of biodiversity networks. Although development within the Nature Improvement Area (NIA) is not restricted (over and above flood risk constraints), Draft GCP Policy F3 requires appropriate mitigation and compensation measures in development proposals to contribute to overall NIA target species and habitats. Policy F4 further seeks to avoid negative effects on trees, woodland and hedgerow habitats that support wildlife interests. The policy mitigation provided through the GCT JCS and Draft GCP is considered sufficient to ensure that development in Gloucester will not lead to any significant negative effects on biodiversity.

5.79 It should be noted that Policy G15 seeks to control Gull populations, to minimise the risks to public health and reduce the associated impacts on buildings and townscape (excrement, stone throwing and aggression). Whilst it is appreciated that significant Gull populations can be a nuisance, they are protected under the Wildlife and Countryside Act 1981. The Policy seeks to undertake all viable steps to prevent gull roosting, nesting and damage. It is recommended that policy wording and reasoned justification wording is amended to identify what is considered 'viable' steps, with an additional clause that prioritises non-lethal solutions.

**Recommendation:** The SA recommends that policy wording and reasoned justification wording is amended to identify what constitutes 'viable' steps to prevent gull roosting, nesting and damage, with an additional clause prioritising non-lethal solutions.

### Appraisal of Site Allocations

5.80 The appraisal of the site allocations found that the majority of the sites have the potential for a residual neutral effect on biodiversity. Development at site allocations 21 and 41 is considered to have the potential for minor negative effects due to the presence of locally designated biodiversity or protected species/habitats on site, however, mitigation provided through GCT JCS and Draft GCP policies is considered sufficient to ensure that there will be no significant negative effects.

5.81 A large proportion of the site allocations are located on brownfield land. Research has demonstrated that brownfield sites can support a wide range of habitats and species<sup>101</sup> and thus have significant biodiversity values. In this respect Phase 1 Habitat Surveys could help to identify biodiversity values at the site allocations. Mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects on biodiversity, however the presence of important species on site has the potential to delay development whilst appropriate surveys and mitigation

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<sup>101</sup> TCPA (2004) Biodiversity by Design – A guide for sustainable communities



are undertaken. By identifying biodiversity values at early stages of planning, risk of disturbance can be reduced, and the extent of any required mitigation can be appropriately planned for.

**Suggestion:** Policy / accompanying text wording to encourage early Phase 1 Habitats Survey on brownfield sites.

### Synergistic and Cumulative Effects

- 5.82 The GCT JCS and Draft GCP seek to protect important designated and non-designated biodiversity from adverse effects. Policies also seek positive contributions to biodiversity networks, and seek to avoid fragmentation of habitats. Overall it is not considered likely that development will lead to any significant negative cumulative effects on biodiversity. Policies that seek biodiversity enhancement (e.g. Policy F3 seeking development contributions to the Nature Improvement Area) can lead to long-term minor positive cumulative effects.

### Interrelationships with other Topics

- 5.83 The natural environment is influenced by and affects a number of the topics considered through the SA. Potential negative effects on biodiversity can also have indirect negative effects on communities, health, climate change, air quality, water quality and flooding. Similarly, improvements to biodiversity can also have benefits for these topics. It is considered that there is sufficient mitigation available through the GCT JCS and Draft GCP to ensure that there will be no significant negative indirect effects.

## Soil

SEA Directive Topics: Soil

Relevant SA Objectives:

- SA Objective 7: Improve soil quality.
- SA Objective 11: Improve air quality, reduce noise and light pollution and reduce the amount of contaminated land.

Relevant GCP Topics Paper(s): Natural Environment, Health and Wellbeing

### Appraisal of Draft GCP Policies

- 5.84 The Plan area contains small areas of best and most versatile agricultural land on the peripheral of the city, and development has the potential to negatively affect soil quality through direct loss of this resource, or by potential contamination effects. The Minerals Local Plan<sup>102</sup> also safeguards

<sup>102</sup> Gloucestershire County Council (2014) Minerals Local Plan Site Options and Draft Policy Framework Consultation Document



existing sites for mineral working within the City and development has the potential to hinder future access to or use of mineral deposits, with the potential for minor negative effects.

- 5.85 Mitigation for the identified effects is provided through the GCT JCS. Policy SD15 requires that development must not result in unacceptable levels of soil pollution, and Policy SD4 seeks to avoid unnecessary sterilisation of mineral resources or contamination of land. Further mitigation is also provided through the Draft GCP. Policy D12 restricts development that may be liable to soil pollution, and Policy D13 requires prior investigations and mitigation plans in development proposals on land which may be contaminated.
- 5.86 It is considered that there is sufficient mitigation provided through policies contained within the GCT JCS and Draft GCP to ensure that there will be no significant negative effects on soils.

### **Appraisal of Site Allocations**

- 5.87 Only one of the site allocations was found to contain best and most versatile agricultural land (site allocation 20 – Land East of Waterwells), and over half of this site is grade 3a agricultural land. The loss of this land through development at the site is considered to have the potential for a permanent major negative effect on soils. Development at any of the site allocations will not lead to the loss of existing safeguarded mineral workings.
- 5.88 A significant number of the site allocations would involve the regeneration of previously developed land with the potential for minor to major long term positive effects on soil quality. Site allocations located on predominantly greenfield land were considered to have the potential for minor long term negative effects on soils through the development of a previously undeveloped area.

### **Synergistic and Cumulative Effects**

- 5.89 Overall the GCP seeks to locate the majority of new development proposed through the Plan on brownfield land, which will contribute to the retention and protection of soil quality, however development will inevitably result in the loss of some greenfield land with the potential for a minor long term negative cumulative effect on soils. However, given the available mitigation it is considered unlikely that the Draft GCP will lead to any significant negative cumulative effects on soil quality.

### **Interrelationships with other Topics**

- 5.90 The natural environment is influenced by and affects a number of the topics considered through the SA. Potential negative effects on the natural environment can also have indirect negative effects on communities and health, climate change, air quality, water resources, water quality, and flooding. Similarly, improvements to the natural environment can also have benefits for these topics. It is considered that there is sufficient mitigation

available through the GCT JCS and Draft GCP to ensure that there will be no major indirect negative effects.

## Cultural Heritage

SEA Directive Topics: Cultural Heritage

Relevant SA Objectives:

- SA Objective 9: Protect and enhance the distinctive townscape quality and historic heritage and its setting.
- SA Objective 25: Protect and enhance the cultural heritage and offering of individual settlements.

Relevant GCP Topics Paper(s): Historic Environment, Design

### Appraisal of Draft GCP Policies

- 5.91 The employment and housing development proposed in the GCP has the potential for significant effects on the topic of Cultural Heritage. Development has the potential to negatively affect heritage assets through changes to character and / or settings. Conversely, development also has the potential for positive effects, through:
- changes that enhance the character and / or setting of designated and non-designated heritage assets,
  - by bringing redundant buildings back into use, by improving access and signage,
  - and by securing long-term conservation for heritage assets 'at risk'.
- 5.92 Mitigation is provided through Policy SD9 in the GCT JCS, which requires development to make a positive contribution to local character and distinctiveness and conserves designated and undesignated heritage assets and their settings in a manner appropriate to their significance. The Policy also looks to secure future conservation, or bring back into use, vacant or derelict heritage assets and heritage assets 'at risk'.
- 5.93 Whilst the GCT JCS provides protection for heritage assets and their settings, the policy remains a strategic policy with less locally specific information. The GCP therefore presents an opportunity to identify locally specific constraints and opportunities, as well as values and characteristics that contribute to enhancing local settings. This can support and guide development proposals to help achieve high quality standards and positive enhancements.
- 5.94 Policy E1 sets the criteria that development must meet in order to be permitted, which includes the use of traditional, local materials, consideration of the curtilage of heritage assets, and the compatibility of the proposed development with the use of the heritage asset. This is supported by Policy E4 which seeks to ensure that shopfront, shutter and sign design is congruent with

the character of the area, and together these policies protect locally specific heritage characteristics to support high-quality and responsive design.

- 5.95 The GCP area has rich archaeological heritage, some of which is of national importance, but remains undesignated. The GCP will be key to addressing the potential impacts arising on archaeology in this respect. Policy E1 seeks to protect non-designated archaeological remains in a manner proportionate to that undertaken for Scheduled Monuments, which is supported by Policy E3 seeking to retain Buildings of Local Importance (identified on the Local List). Policy E2 also seeks to ensure that appropriate investigation and recording of heritage assets is undertaken prior to any loss.
- 5.96 The policy mitigation provided through the GCT JCS and the Draft GCP is considered sufficient to ensure that development will not lead to any significant negative effects on the historic environment and cultural heritage. Policy guidance contained within the Draft GCP also presents opportunities for minor positive effects on the historic environment through high-quality, responsive design and the support of positive enhancements.

### **Appraisal of Site Allocations**

- 5.97 The appraisal of site allocations found that the majority of the sites have the potential for a residual neutral effect on heritage, although many of these sites are located in a heritage setting, it is considered that mitigation provided through the GCT JCS and Draft GCP has the potential to sufficiently address potential negative effects. None of the site allocations were considered to have the potential for major negative effects, however site allocations 1, 3, 4, 5, 6, 7, 19, 26 and 45 were considered to have the potential for residual minor negative effects largely as a result of the sites containing designated heritage assets which could be affected by development. It is also considered that there is an element of uncertainty until site level details arise. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that designated heritage assets are retained in development and conserved in a manner appropriate to their significance. Design policies in the Draft GCP should ensure that development positively contributes to the historic environment of Gloucester.

### **Synergistic and Cumulative Effects**

- 5.98 Much of the development proposed within the Draft GCP is located centrally supporting the identified regeneration zones and development of the central area. The majority of Conservation Areas and Listed Buildings are concentrated in the central area, and much of this is also an Area of Principal Archaeological Interest. Cumulatively therefore development has the potential to significantly change the setting of the central area and historic core of Gloucester. Overall the GCT JCS and Draft GCP seek to protect and enhance heritage, as well as avoid development that would have a negative effect on the significance of designated and non-designated heritage assets and / or their setting. There is an element of uncertainty until project level details arise. However, it is recognised that development has the potential for negative effects from the integration of new development, but

also for positive effects from successful integration that supports community needs, positively contributes to the setting, involves the re-use of redundant or disused Listed Buildings, and raises awareness. It is considered that there is suitable mitigation available through GCT JCS and Draft GCP policies to ensure that there will be no major negative cumulative effects on heritage assets and / or their settings.

### Interrelationships with other Topics

- 5.99 Heritage has links to a number of other topics as it can be affected by housing, employment, communities and the natural environment (landscape impacts). The protection and enhancement of heritage can also have indirect positive effects on communities, health, and landscapes.

#### Waste and Recycling

SEA Directive Topics: Material Assets

Relevant SA Objectives:

- SA Objective 10: Minimise the volume of waste created and promote the waste hierarchy (reduce, reuse, recycle).

Relevant GCP Topics Paper(s): Design

### Appraisal of Draft GCP Policies

- 5.100 Development has the potential to increase waste generated, both through construction, and as a result of occupation of new housing and employment development. The policies contained within the Waste Core Strategy<sup>103</sup> provide mitigation for the negative effects associated with an increase in waste, including Policy WCS2 which seeks waste reductions, and Policy WCS3 promoting recycling and composting. This mitigation is supported through Policy SD4 in the GCT JCS which requires sustainable design and construction that includes the minimisation of waste. Although there are no further dedicated policies for waste within the Draft GCP, it is considered that the directions and mitigation provided through the Waste Core Strategy and GCT JCS, and available at the project level, are sufficient to ensure that there will be no significant negative effects in the delivery of the GCP.

### Appraisal of Site Allocations

- 5.101 The SA Framework has identified that all site allocations could minimise the creation of waste and promote the waste hierarchy, with the potential for minor positive effects against this topic. The mitigation provided through the Waste Core Strategy and GCT JCS should ensure that new development

<sup>103</sup> Gloucestershire County Council (2012) Gloucestershire Waste Core Strategy

contributes to minimising waste and effectively manages waste according to the waste hierarchy.

### **Synergistic and Cumulative Effects**

- 5.102 Development is considered to have the potential for minor negative cumulative effects on waste and recycling by increasing the overall rate of generation and disposal of waste. However, this is strategically planned for through the Gloucestershire Waste Core Strategy and GCT JCS, which provides sufficient mitigation to ensure that there will be no significant negative effects.

### **Interrelationships with other Topics**

- 5.103 Waste management is closely linked with communities and health and the landscape, with the potential for both negative and positive indirect effects. Existing policy mitigation is considered sufficient to ensure that development will not lead to any significant negative effects, and indirect effects are therefore unlikely.

### **Equalities Impact Assessment (EqIA)**

- 5.104 Under the Equality Act 2010, public authorities such as Gloucester City Council must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
  - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
  - Foster good relations between people who share a characteristic and those who do not share a characteristic.
- 5.105 An EqIA is a tool which seeks to improve the work of the Council and ensure that they meet the requirement of the Equality Act 2010. This Act applies to the provision of services and public functions and includes the development of Council policies and plans. The Act prevents discrimination on the basis of nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 5.106 Inequality can exist in a number of forms and where land use planning is concerned, this can include inadequate provision of and access to services (health, food stores, education facilities), good quality homes, employment opportunities, a healthy living environment and transport infrastructure (roads, pavements, public transport) for all members of society.
- 5.107 It is important to note that assessment of equality, diversity, and health/wellbeing (which is an important aspect of equality) has been detailed through the SA process. All aspects of the development Draft GCP have been appraised against an SA Framework including several SA

objectives that directly and indirectly address equality, health and diversity and these include: No.3, No.5, No.6, No.8, No.9, No.12, No.13, No.14, No.16, No.17, No.18, No.19, No.20, No.24, No.25. The findings of the EqIA have been integrated into the SA of the Draft GCP and are provided separately as Appendix V to this SA Report.

- 5.108 The screening assessment has found that the Draft GCP is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

### **Habitats Regulations Assessment (HRA)**

- 5.109 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites<sup>104</sup>.
- 5.110 The HRA process for the GCP will be informed by the findings and conclusions of the HRA process for the GCT JCS. The Pre-Submission Draft GCT JCS HRA Report<sup>105</sup> (May 2014) concluded that the mitigation provided through GCT JCS policies and available at the project level is sufficient to ensure that there will be no adverse effects on any European sites as a result of proposed development either alone or in combination.
- 5.111 An initial screening assessment of the Draft GCP was carried out to determine if the emerging policies and potential sites have the potential for likely significant effects on any European sites. The screening found that none of the European sites identified will suffer from significant alone or in combination effects from atmospheric pollution, disturbance or changes in water levels and quality caused by the Draft GCP. The screening found that although some sites were at risk to significant effects, policy mitigation provided through the Draft GCP and GCT JCS was comprehensive enough to ensure that the European sites will not be affected.

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<sup>104</sup> These include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

<sup>105</sup> <http://www.gct-jcs.org/PublicConsultation/SAPR-Sustainability-Appraisal-Pre-Submission.aspx>

## 6.0 Proposed Monitoring

### Introduction

- 6.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>106</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Gloucester City Monitoring Report (produced annually) alongside the monitoring framework provided in the GCT JCS is considered sufficient to ensure appropriate monitoring takes place going forward.

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<sup>106</sup> [http://planningguidance.planningportal.gov.uk/?post\\_type=&s=sustainability+appraisal](http://planningguidance.planningportal.gov.uk/?post_type=&s=sustainability+appraisal)

## 7.0 Consultation and Next Steps

- 7.1 The Draft GCP and its accompanying SA documents are provided for consultation through the Council's website. Comments made and responses will be recorded and made available. Thus consultation is a vital ongoing and iterative element of the plan-making and SA processes. The Draft GCP and accompanying SA Report reflect the findings of various technical studies and responses received so far during consultation.
- 7.2 The Draft GCP and this accompanying Sustainability (Integrated) Appraisal Report will be available for consultation for a period of approximately 6 weeks between January-February 2017.