



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 Assessment¹ (SEA) and Government advises² 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 issues³ alongside the requirements of the Habitats Assessment Regulations⁴ (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 SEA⁵. 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.

¹ Environmental Assessment of Plans and Programmes Regulations, 2004

² DCLG, 2012 National Planning Policy Framework and www.planningguidance.planningportal.gov.

³ To demonstrate compliance with the Equality Act, 2010

⁴ The Conservation of Habitats & Species Regulations, 2010

⁵ 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:

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.

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:

Categories of Significance for SA		
Symbol	Meaning	Sustainability Effect
- -	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 legislation⁶ and paragraph 165 of the National Planning Policy Framework (NPPF). Local Plans must also be subject to Strategic Environmental Assessment⁷ (SEA) and Government advises⁸ 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

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

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

⁸ 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 guidance⁹, and to meet with the requirements of the EU SEA Directive as implemented in UK legislation through the SEA Regulations 2004¹⁰. 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 issues¹¹ alongside the requirements of the Habitats Directive¹² as implemented into UK legislation through the Habitats Regulations¹³. 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 SEA¹⁴. 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)¹⁵. In practice, the evidence base for both processes can be shared with HRA findings and conclusions supporting the SA/SEA.

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

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

¹¹ To demonstrate compliance with the Equality Act, 2010

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

¹³ The conservation of Habitats & Species Regulations, 2010

¹⁴ ODPM A Practical Guide to the SEA Directive 2005

¹⁵ 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 duty¹⁶ 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),

¹⁶ 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

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

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"> Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest. 	<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 designated biodiversity.</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"> There is a need to ensure carbon emissions are minimised 		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.	<p style="text-align: center;">-</p> 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.
		Evidence / Data Source: DEFRA Magic Map and GIS map layers of local biodiversity designations supplied by Gloucester City Council	<p style="text-align: center;">--</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.
	2. Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources Relevant JCS SA Objective: 2, 6	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.	
	3. Improve the resilience of people, businesses and the environment to the unavoidable	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	

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> There is a requirement to maintain and improve the ecological status of the River Basin. 	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 Surface Water Safeguard Zone and the potential effects of development on water quality.	+	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"> A large proportion of the City falls within the River Severn floodplain 		<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>Evidence / Data Source: 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 flood risk area (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>Evidence / Data Source: 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>The site option is not located within an area of flood risk and is not at risk of surface water flooding.</p>
			<p>+</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>0</p>	<p>There is an element of uncertainty until more detailed</p>
<p>?</p>				

Key Issues	SA Objective(s)	Significance Criteria:			
<ul style="list-style-type: none"> ■ There is a need to encourage a move away from the dependence on the private motor car ■ High levels of in-commuting ■ Certain areas suffer from traffic congestion and poor air quality 				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>6a) The nature and significance of the effects against SA Objective 6a will primarily relate to site access and impacts on the highways network.</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>Evidence / Data Sources: 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>6b) 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>distance of the site from existing sustainable transport</p>	+	<p>The site option is within reasonable walking distance</p>

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>modes (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 ¹⁷.</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.
			--	

¹⁷ 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"> Previously developed land may be subject to contamination 		improved sustainable modes of transport. Evidence / Data Source: 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 regenerate previously developed land or would result in the loss of greenfield land or best and most versatile agricultural land.</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> Evidence / Data Source:	++	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"> Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings 		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 townscape / landscape sensitivity and the potential effects of development on townscape / landscape character.	++	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.	+	Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the townscape/ landscape.
		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.		0	A neutral effect is not considered possible.
				The SA assumes that any trees protected by Tree Preservation Orders within a site option will be retained, unless there is evidence to	-
			?		Element of uncertainty exists until more detailed lower level assessments have been carried out.

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest. 		<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>Evidence / Data Source: 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 designated heritage assets (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Areas of Archaeological Potential & 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>0</p> <p>?</p> <p>-</p> <p>--</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>Evidence / Data Source: National Heritage List for England, DEFRA Magic Map, and GIS map layers supplied by Gloucester City Council.</p>		
<ul style="list-style-type: none"> There is a national requirement to minimise waste production and waste sent to landfill. 	<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"> Previously developed land may be subject to contamination Certain areas of the City suffer from traffic congestion and poor air quality. 	<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 style="text-align: center;">++</p> <p style="text-align: center;">+</p> <p style="text-align: center;">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>?</p>	<p>An element of uncertainty exists until more detailed site level assessments have been undertaken.</p>
			<p>-</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>--</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 conflicting neighbouring land uses.</p>		

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> ■ Need to plan for and protect quality employment land and ensure a future supply ■ There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry ■ There are older, less attractive employment areas ■ Poor retail provision compared to the size of Gloucester's shopper population ■ Limited early hours / evening economy ■ Lack of overnight tourist visitors 	<p>12. Ensure the availability of employment land and premises to secure future prosperity potential</p> <p>Relevant JCS SA Objective: 10</p>	<p>Evidence / Data Source: 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 capacity of the site to accommodate new employment development</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>Evidence / Data Source: 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>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"> ■ There are areas of the City that experience high unemployment rates ■ High levels of in-commuting ■ 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) 	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 distance of the site from existing services and facilities 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	
				0	A neutral effect is not considered possible.
			?		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"> ■ <i>There is a need to ensure carbon emissions are minimised</i> ■ There are inequalities in opportunity across the Plan area ■ 'Pockets' of acute deprivation exist in some parts of the City 		<p>A reasonable walking distance of 800m has been utilised in the assessment ¹⁸.</p> <p>Evidence / Data Source: 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 provision of development in Gloucester LSOAs in the 10-30% most deprived areas in England¹⁹.</p> <p>Evidence / Data Source: 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>	

¹⁸ 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

¹⁹ 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"> High levels of obesity in both adults and children 				
			?	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 distance of the site from existing health facilities and promoted walking routes ²⁰ . A reasonable walking distance of 800m has been utilised in the assessment ²¹ . Evidence / Data Source: 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.	

²⁰ 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

²¹ 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:									
			<table border="1"> <tr> <td data-bbox="1603 229 1720 363">?</td> <td data-bbox="1720 229 2168 363">There is an element of uncertainty until lower level assessments have been carried out.</td> </tr> <tr> <td data-bbox="1603 363 1720 497">-</td> <td data-bbox="1720 363 2168 497">The site option is located beyond reasonable walking distance (over 800m) to existing health facilities</td> </tr> <tr> <td data-bbox="1603 497 1720 794">--</td> <td data-bbox="1720 497 2168 794">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.		
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--	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.										
<ul style="list-style-type: none"> ■ Homelessness ■ There is acute housing 'need' in 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, and a need to balance the housing stock to accommodate this 	<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 capacity of the site option to accommodate new housing.</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>Evidence / Data Source: Officer input</p>	<table border="1"> <tr> <td data-bbox="1603 794 1720 928">++</td> <td data-bbox="1720 794 2168 928">The site option has the potential to provide a significant amount of new housing (100 dwellings or more)</td> </tr> <tr> <td data-bbox="1603 928 1720 1027">+</td> <td data-bbox="1720 928 2168 1027">The site option has the potential to provide new housing (less than 100 dwellings)</td> </tr> <tr> <td data-bbox="1603 1027 1720 1193">0</td> <td data-bbox="1720 1027 2168 1193">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 data-bbox="1603 1193 1720 1353">?</td> <td data-bbox="1720 1193 2168 1353">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)										
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?	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"> ■ The City needs to protect areas of public open space and green corridors/networks and provide a comprehensive, connected and accessible network of spaces. ■ Crime and fear of crime. 			-	Not applicable.	
			--	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 accessibility of open space and green space in relation to the site option, as well as the potential for development to result in a net loss / net gain in open or green spaces.</p> <p>A reasonable walking distance of 800m has been utilised in the assessment²².</p> <p>Evidence / Data Source: GIS map layer supplied by Gloucester City Council.</p>	++	Development at the site option has the potential to result in a net gain in open / green space	
	20. Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations Relevant JCS SA Objective: 16		+	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				It is assumed that development at any of the site options could incorporate secured by design standards ²³ . It is therefore assumed that all

²² 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

²³ Secured by Design Homes 2016; Official Police Security Initiative

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> Localism driving increased local level participation. 	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"> Educational achievement needs improving 	24. Support the development of accessible education, skills and learning, to meet the needs of both employers and the working population	The nature and significance of the effects against SA Objective 24 will primarily relate to the distance of the site from existing educational facilities. A reasonable walking distance of 800m has been utilised in the assessment ²⁴ . Evidence / Data Source: 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
	Relevant JCS SA Objective: 17		<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>			

²⁴ 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"> ■ Adequate protection of cultural heritage. 	<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 (NO₂) 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 Government²⁵ 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 125,600²⁶, demonstrating a continuing increasing trend since 2001²⁷. 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 2035²⁸. 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

²⁵ 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/>

²⁶ NOMIS official labour market statistics

²⁷ ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

²⁸ Gloucester City Council (2016) Regeneration and Economic Development Strategy

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

- 3.20 In 2011³⁰, 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, evidence³¹ 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 2014³² identifies that Gloucester is ranked 2nd 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 SHMA³³ 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

²⁹ Ibid

³⁰ ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

³¹ ONS – 2011 Census

³² Centreforcities (2014) Cities Outlook 2014

³³ 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 Strategy³⁴ 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 statistics³⁵ 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 guide³⁶ 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

³⁴ Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

³⁵ ONS, Neighbourhood Statistics: Gloucester Local Authority Crime and Safety

³⁶ 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 2015³⁷, 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. Evidence³⁸ 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 qualifications³⁹. 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 College⁴⁰.
- 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 Britain⁴¹. 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 Plan⁴² 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,

³⁷ NOMIS official labour market statistics

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁴¹ NOMIS official labour market statistics

⁴² 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 businesses⁴³.

- 3.33 The Centre for Cities Outlook 2014 identifies that Gloucester is ranked 2nd 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 strategies⁴⁴. Gloucester further attracts 5.9 million visitor trips each year and annually, visitor spend is £207 million⁴⁵.
- 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 Street⁴⁶. 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 shops⁴⁷. The Retail Study⁴⁸ 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

⁴³ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁴⁴ Centreforcities (2014) Cities Outlook 2014

⁴⁵ Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

⁴⁶ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁴⁷ Ibid.

⁴⁸ 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. Evidence⁴⁹ 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 Strategy⁵⁰ 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 spoken⁵¹.
- 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 2013⁵². 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

⁴⁹ Gloucester City Council (2016) Topic Paper; Health and Wellbeing

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

⁵¹ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁵² 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 Gloucestershire⁵³. The Open Space Strategy⁵⁴ however identifies that access to formal sports and play provision is also not equally distributed across the city. The Playing Pitch Strategy⁵⁵ 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 Audit⁵⁶ 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 Strategy⁵⁷ 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

⁵³ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁵⁴ Gloucester City Council, Open Space Strategy, 2014 - 2019

⁵⁵ Knight, Kavanagh & Page (2015) Gloucester Playing Pitch Strategy 2015-2025

⁵⁶ Gloucester City Council, Quantitative Open Space Audit, 2008

⁵⁷ 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 Staverton⁵⁸ (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 Cheltenham⁵⁹. It should also be noted that traffic is a key source of emissions in the area, which indirectly affects air quality. 2011 ONS data⁶⁰ 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 Plan⁶¹ 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

⁵⁸ Gloucestershire Airport

⁵⁹ Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

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

⁶¹ 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 Plan⁶² (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 map⁶³ however identifies a lack of connections across the Cotswolds AONB, and the Draft Local Transport Plan⁶⁴ 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 Evidence⁶⁵ identifies that Gloucester, as situated on the eastern bank of the tidal River Severn and backed by the Cotswold escarpment, has prevailing

⁶² GFirst LEP (2014) Strategic Economic Plan for Gloucestershire

⁶³ Sustrans.org.uk; National Cycling Network

⁶⁴ Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

⁶⁵ 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 2013⁶⁶:
- 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

⁶⁶ 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 2013⁶⁷:
 - 281.6 kt CO² from Industry and Commercial
 - 229.2 kt CO² from Domestic
 - 117.0 kt CO² 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 CO² in Gloucester.
- 3.60 The Climate Change Strategy⁶⁸ 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,

⁶⁷ DECC (2015) 2005 to 2013 UK local and regional CO₂ emissions full dataset

⁶⁸ 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 maps⁶⁹ 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. Evidence⁷⁰ 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 SFRA⁷¹ 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.

⁶⁹ Environmental Agency; Flood Map for Planning (from Rivers and the Sea)

⁷⁰ Gloucester City Council (2016) Topic Paper: Flooding

⁷¹ 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 scenarios⁷². The scale of damage therefore remains high. The SFRA⁷³ 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 Report⁷⁴ 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 DEFRA⁷⁵ 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.

⁷² Ibid.

⁷³ Ibid.

⁷⁴ Gloucester City Council (2015) Housing Monitoring Report

⁷⁵ 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 2009⁷⁶ it was identified that nearly 400 site contamination investigation and remediation reports were on file with Gloucester City Council. The contaminated land register⁷⁷ 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 condition⁷⁸. 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 grazing⁷⁹. 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 yields⁸⁰.

⁷⁶ Gloucester City Council (2009) Contaminated Land - An Inspection Strategy for Gloucester

⁷⁷ Gloucester City Council (2016) Public Register of Contaminated Land

⁷⁸ DEFRA Magic Map Application [online].

⁷⁹ Natural England Designated Sites View [online].

⁸⁰ 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 Strategy⁸¹ identifies that six of the designated Local Nature Reserves are located within Gloucester city. The Gloucestershire Nature Map⁸² 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 include⁸³:
- 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

⁸¹ Gloucester City Council Open Space Strategy 2014 - 2019

⁸² www.gloucestershirenature.org.uk

⁸³ 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 so⁸⁴. 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

⁸⁴ 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 Evidence⁸⁵ 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.

⁸⁵ Gloucester City Council (2016) Topic Paper: Historic Environment

Minerals and Waste

- 3.92 The Gloucestershire Minerals Local Plan⁸⁶ 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 level⁸⁷. 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

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

⁸⁷ 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.

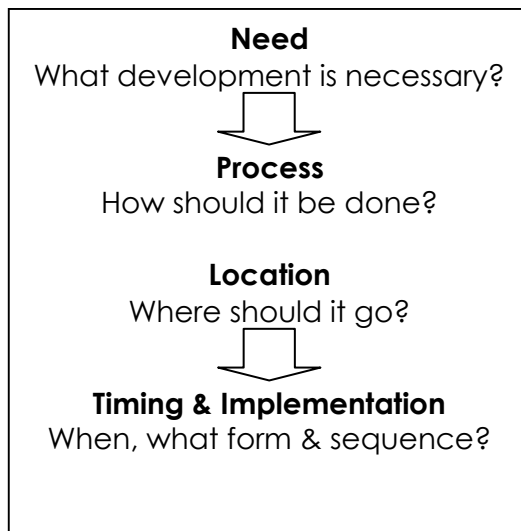
Homelessness
There are inequalities in opportunity across the Plan area.
High levels of obesity in both adults and children.
Adequate protection of cultural heritage.
Localism driving increased local level participation.
Crime and fear of crime.
There are areas of the City that experience high unemployment 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 Directive⁸⁸ 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 guidance⁸⁹ 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 guidance⁹⁰ 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

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

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

⁹⁰

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf

spatial and land use plans. The Forest Heath Judgment⁹¹ 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 Judgment⁹² 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 Judgment⁹³ 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

⁹¹ Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

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

⁹³ 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 Report⁹⁴ (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 Report⁹⁵ (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 Report⁹⁶ (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

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

⁹⁵ <http://www.gct-jcs.org/>

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

through public consultation in May – July 2013⁹⁷ 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.

⁹⁷ <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 st 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 42,000m² 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 Strategy⁹⁸. 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

⁹⁸ 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 3⁹⁹ (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

⁹⁹ 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 species¹⁰⁰ 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

¹⁰⁰ 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 species¹⁰¹ 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

¹⁰¹ 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 Plan¹⁰² also safeguards

¹⁰² 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 Strategy¹⁰³ 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

¹⁰³ 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 sites¹⁰⁴.
- 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 Report¹⁰⁵ (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.

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

¹⁰⁵ <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 guidance¹⁰⁶ 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.

¹⁰⁶ 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.

Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive¹ (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)². This is Appendix 1 of the Sustainability (Integrated) Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Appraisal Report (August 2016) –and in accordance with paragraph 165 of the National Planning Policy Framework (2012)³.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<ul style="list-style-type: none"> ▪ An outline of the contents, main objectives of the plan and relationship with other relevant plans 	Section 1 Introduction	<ul style="list-style-type: none"> ▪ Sets out the vision and main objectives of Draft Gloucester City Plan .
	Section 3 Context & Baseline	<ul style="list-style-type: none"> ▪ Summarises the relationship with other relevant plans and the implications for the Draft Gloucester City Plan (GCP).
<ul style="list-style-type: none"> ▪ The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan 	Section 3 Context & Baseline	<ul style="list-style-type: none"> ▪ Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the GCP area, and likely evolution without the Plan.
<ul style="list-style-type: none"> ▪ The environmental characteristics of the area likely to be affected 	Section 3 Context & Baseline	<ul style="list-style-type: none"> ▪ Summarised in Section 3 of Main SA Report.
<ul style="list-style-type: none"> ▪ Any existing environmental problems which are relevant to the 	Section 3 Context &	<ul style="list-style-type: none"> ▪ Summarises existing sustainability (including environmental problems) for the GCP area.

¹ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

² <http://www.parliament.uk/documents/post/postpn223.pdf>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
plan including, in particular, those in relation to any areas of a particular environmental importance	Baseline	
<ul style="list-style-type: none"> ▪ The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation 	Section 2 IA Methods Section 3 Context & Baseline	<ul style="list-style-type: none"> ▪ Provides the summary of objectives for sustainability in the GCP area (including environmental objectives) and the implications of these objectives for the Draft GCP. Detailed SA Framework guiding assessment of effects against the Objectives.
<ul style="list-style-type: none"> ▪ The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects 	Section 2 IA Methods Table 2.1	<ul style="list-style-type: none"> ▪ Presents the SA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA objectives. This ensures that all of the issues are considered during the assessment of each element of the Draft GCP. All policies and site allocations are assessed against SA objectives.
	Section 5 Appendices III to V	<ul style="list-style-type: none"> ▪ Summarises the likely significant effects of implementing the Draft GCP (including environmental effects) with details provided in the appendices. ▪ Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term
<ul style="list-style-type: none"> ▪ The measures envisaged to prevent, reduce and as fully as possible offset any significant 	Section 5 Appendices III to V	<ul style="list-style-type: none"> ▪ Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are provided in Section 5 of the SA Report and in the

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
adverse effects on the environment of implementing the plan		appraisal matrices (appendices).
<ul style="list-style-type: none"> ▪ An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information 	Sections 4, 5 Table 5.1	<ul style="list-style-type: none"> ▪ The potential site allocations were appraised through SA (appendix IV). The reasons for progressing options & not taking others forward is set out in Table 5.1.
	Sections 2 & 3 Methods & Context, Baseline	<ul style="list-style-type: none"> ▪ Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.
<ul style="list-style-type: none"> ▪ A description of the measures envisaged concerning monitoring 	Section 6	<ul style="list-style-type: none"> ▪ Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Draft GCP.
<ul style="list-style-type: none"> ▪ A non-technical summary of the information provided under the above headings 	Report preface (available separately)	<ul style="list-style-type: none"> ▪ Provides a non-technical summary.

Appendix II: Review of Key Issues and SA Objectives

Key Issues

Key Issues carried forward from City Plan Part 1 Sustainability Appraisal Summary (Feb 2012)	2016 review following updated baseline information and PP Review	Revised Key Issue 2016
Environmental		
Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest	Remains current and valid.	No change
A large proportion of the City falls within the River Severn floodplain	Remains current and valid.	No change
Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings	Remains current and valid.	No change
Certain areas of the City suffer from traffic congestion and there is a need to encourage a move away from the dependency on the private motor car	There are also key traffic hotspots in the Plan area which have resulted in poor air quality and the designation of 3 AQMAs, addressing existing air quality issues should be a key issue.	Key issues separated and clarified as follows: 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 motor car
There is a need to ensure carbon emissions are minimised	Remains current and valid.	No change

Previously developed land may be subject to contamination	Remains current and valid.	No change
The City needs to protect areas of public open space and green corridors/networks	GI should also be accessible and connected at a strategic level.	Amended as follows: The City needs to protect areas of public open space and green corridors/networks and provide a comprehensive, connected and accessible network of spaces.
N/A	The 2016 update to the baseline information and PP Review has identified two new environmental key issues for the Plan area.	New Key Issues: There is a requirement to maintain and improve the ecological status of the River Basin.
		There is a national requirement to minimise waste production and waste sent to landfill.
Economic		
There are areas of the City that experience high unemployment rates	Remains current and valid.	No change
There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry	Remains current and valid.	No change
High levels of in-commuting	Remains current and valid.	No change
Limited early hours / evening economy	Remains current and valid.	No change

Need to plan for and protect quality employment land and ensure a future supply	Remains current and valid.	No change
There are older, less attractive employment areas	Remains current and valid.	No change
Lack of overnight tourist visitors	Remains current and valid.	No change
Poor retail provision compared to the size of Gloucester's shopper population	Remains current and valid.	No change
N/A	The 2016 update to the baseline information and PP Review has identified one new economic key issue.	New Key Issue: 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).
Social		
There is acute housing 'need' in the City	Remains current and valid.	No change
'Pockets' of acute deprivation exist in some parts of the City	Remains current and valid.	No change
There is a significant growth in the population predicted, particularly in the young and working age bands	Remains current and valid.	No change

Growth in the number of households, in particular single person households	This issue could be expanded, as the growth in single person households is in disparity with the existing housing stock that is currently dominated by semi-detached housing.	Amended as follows: Growth in the number of households, in particular single person households, and a need to balance the housing stock to accommodate this.
Educational achievement needs improving	Remains current and valid.	No change
Homelessness	Remains current and valid.	No change
N/A	The 2016 update to the baseline information and PP Review has identified five new social key issues.	New Key Issues: There are inequalities in opportunity across the Plan area.
		High levels of obesity in both adults and children.
		Crime and fear of crime.
		Localism driving increased local level participation.
		Advanced understanding of adequate protection for cultural heritage.

SA Objectives

Strategic Level GCT JCS SA Objectives	Relevant Local Level GCP SA Objectives	2016 Review Update	Revised SA Objective 2016
1. Biodiversity - Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	1. Protect, restore, create and enhance habitats, species and sites of wildlife or geological interest	Suggest that this is revised to ensure that connectivity at the strategic scale is aimed for and monitored in line with the GCT JCS framework	1. Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest
2. Climate Change Mitigation - Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	2. Reduce contribution to climate change, and improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change	Adaptation and mitigation mixed, suggest this is revised for clarification	2. Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources
3. Climate Change Adaptation - Adapt to the consequences of climate change	3. Support households and businesses in reducing their carbon footprint and the use of natural resources		3. Improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change.
4. Flooding - Manage and reduce flood risk and surface water run-off.	5. Protect floodplain from development likely to exacerbate flooding problems from all sources	No update	No change to GCP SA Objective 5.
5. Natural Environment and Resources: Quality - Protect and improve the quality of natural resources including soil, water and landscape	7. Improve soil quality 8. Protect and enhance landscaped character	No update	No change to GCP SA Objective 7 and 8.
6. Natural Environment and Resources: Use - Minimise the use of natural resources including soil, water and	4. Reduce water use and conserve and improve water resources	SA Objective 4 could be clarified to directly address both water resources and water quality	4. Reduce water use and conserve and improve the quality of water bodies in the Plan area

greenfield land through good design	15. Integrate sustainable construction principles and standards into all development schemes	No update	No change to GCP SA Objective 15.
7. Historic Environment - Protect and enhance the area's distinctive historic environment	9. Protect and enhance the distinctive townscape quality and historic heritage	In line with the NPPF, the setting of heritage assets is also considered.	9. Protect and enhance the distinctive townscape quality and historic heritage and its setting.
8. Sustainable Transport - Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	6. Reduce the need to travel and maximise the use of sustainable modes of transport	No update	No change to GCP SA Objective 6.
9. Waste and Pollution - Minimise pollution and waste to landfill	10. Minimise the volume of waste created and promote the waste hierarchy (reduce, reuse, recycle) 11. Improve air quality, reduce noise and light pollution and reduce the amount of contaminated land	No update	No change to GCP SA Objectives 10 and 11.
10. The Economy - Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	12. Ensure the availability of employment land and premises to secure future prosperity potential 13. Support the economy by helping new and existing businesses to fulfil their potential	No update	No change to GCP SA Objectives 12 and 13

11. City and Town Centres - Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	14. Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	In the local level plan, this could include local centres.	14. Support the vitality and viability of the city centre as a retail, service, leisure and learning destination, and local centres that support local needs
12. Sustainable Communities - Reduce inequalities in wellbeing and opportunity	16. Reduce inequalities in wellbeing and opportunity	No update	No change to GCP SA Objective 16.
13. Sustainable Communities - Reduce crime and the fear of crime	21. Reduce crime and the fear of crime	No update	No change to GCP SA Objective 21.
14. Health - Improve access to health facilities and promote healthy lifestyles	17. Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities	No update	No change to GCP SA Objective 17.
15. Housing - Ensure everyone has access to a decent home that they can afford and meets their needs	18. Ensure the availability of housing land and premises including affordable housing to meet local need	No update	No change to GCP SA Objective 18.
16. Green Space - Create, enhance, protect, connect and improve access to open spaces	19. Minimise development on open space and green spaces 20. Maximise opportunities for the creation of new and enhancement of existing open spaces	No recommendations for SA Objective 19. SA Objective 20 could be directly linked to accessibility to enhance the health benefits of GI for people. The overall connectivity of these spaces should also be considered in line with the Open Space Strategy.	No change to GCP SA Objective 19. 20. Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations

17. Education and Skills - Improve access to education and life-long learning and enhance skills	24. Support the development of accessible education, skills and learning, to meet the needs of both employers and the working population	No update	No change to GCP SA Objective 24.
18. Culture and Tourism - Protect and enhance cultural heritage and promote tourism	25. Protect and enhance the cultural heritage and offering of individual settlements	No update	No change to GCP SA Objective 25.
N/A	22. Encourage everyone to participate in local decision making	No update	No change to GCP SA Objective 22.
		It should be noted that the GCP SA Objectives do not run consecutively, SA Objective 23 is missing.	

Appendix III: Compatibility Analysis of the Draft Gloucester City Plan Vision and Objectives

Key:

Neutral	○
Very Compatible	++
Compatible	+
Uncertain	?
Incompatible	-
Very Incompatible	--

Compatibility Analysis of Draft Gloucester City Plan Vision

Gloucester City Plan 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.”

SA No.	SA Objective	Compatibility Analysis
1	Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest	++
2	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources	+
3	Improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change.	+
4	Reduce water use and conserve and improve the quality of water bodies in the Plan area	+
5	Protect floodplain from development likely to exacerbate flooding problems from all sources	+
6	Reduce the need to travel and maximise the use of sustainable modes of transport	++
7	Improve soil quality	++
8	Protect and enhance landscaped character	++
9	Protect and enhance the distinctive townscape quality and historic heritage and its setting.	++
10	Minimise the volume of waste created and promote the waste hierarchy (reduce, reuse, recycle)	?
11	Improve air quality, reduce noise and light pollution and reduce the amount of contaminated land	++
12	Ensure the availability of employment land and premises to secure future prosperity potential	++
13	Support the economy by helping new and existing businesses to fulfil their potential	++
14	Support the vitality and viability of the city centre as a retail, service, leisure and learning destination, and local centres that support local needs	++
15	Integrate sustainable construction principles and standards into all development schemes	++
16	Reduce inequalities in wellbeing and opportunity	++
17	Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities	++
18	Ensure the availability of housing land and premises including affordable housing to meet local need	++

19	Minimise development on open space and green spaces	++
20	Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations	++
21	Reduce crime and the fear of crime	+
22	Encourage everyone to participate in local decision making	+
24	Support the development of accessible education, skills and learning, to meet the needs of both employers and the working population	++
25	Protect and enhance the cultural heritage and offering of individual settlements	++

Summary:

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.

SA Recommendation: The Vision could be enhanced by including wording that seeks to minimise waste generation and promotes the waste hierarchy.

Compatibility Analysis of Draft Gloucester City Plan Principles

Draft Gloucester City Plan Proposed Plan Principles to help deliver the plan Vision	Sustainability Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	24	25	
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	0	++	+	0	?	++	++	++	++	++	+	0	+	++	+	+	+	+	++	++	0	0	0	+	
2. To ensure that new development is supported by the necessary infrastructure	0	+	0	0	+	+	0	0	0	0?	0	0	0	+	+	+	+	0	+	+	0	0	0	0	
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	0?	+	0	0?	?	+	++	+	+	++	+	+	++	++	+	+	+	++	+	+	0	+	0	0	
4. To develop a City Centre that provides for the needs of the 21 st Century, with increased choice, an improved environment and to protect it from inappropriate competition in other locations	+	+	+	+	+	+	0	++	++	?	+	+	++	++	+	+	+	0	+	+	0	0	0	+	
5. To provide a balanced network of local and district centres that provide for the everyday shops, services and	0	+	0	0	0	++	0	0	0	0	0	+	+	+	0	+	+	0	0	0	0	0	0	0	

Draft Gloucester City Plan Proposed Plan Principles to help deliver the plan Vision	Sustainability Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	24	25	
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.	0?	0?	0	0?	?	0	0?	?	?	-	?	0	0	0	0	+	+	++	?	?	0	++	0	0	
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.	0?	0	0	0?	0	0	0	0?	0?	?	?	++	++	+	0	+	+	0	0	0	0	0	0	+	0
8. To improve educational attainment, skills and learning opportunities.	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	++	+	0	0	0	0	0	++	0	
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.	++	0	+	++	+	0	+	++	++	0	0	0	0	0	0	+	++	0	++	++	0	0	0	++	
10. To encourage a vibrant and safe evening and night-time	0	0	0	0	0	0	0	0	0	0	0	+	++	+	0	+	+	0	0	0	0	0	0	+	

Draft Gloucester City Plan Proposed Plan Principles to help deliver the plan Vision	Sustainability Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	24	25	
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.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	0	0	0	0	0	0	0	0
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.	0	++	+	0	0	++	0	++	++	+	++	0	0	0	++	+	+	0	0	+	++	0	0	0	
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.	0	++	+	0	+	++	+	+	+	0	++	0	0	0	++	+	+	0	0	0	0	0	0	0	
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,	0	++	++	0	0	+	++	+	+	+	++	0	0	0	0	++	++	0	++	++	0	0	0	+	

Draft Gloucester City Plan Proposed Plan Principles to help deliver the plan Vision	Sustainability Objectives																								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	24	25	
playing fields and community facilities, and protecting air quality and residents from pollution and contamination.	Blue	Green	Green	Blue	Blue	Light Green	Green	Light Green	Light Green	Light Green	Green	Blue	Blue	Blue	Blue	Green	Green	Blue	Green	Green	Blue	Blue	Blue	Blue	Light Green
<p>Summary: The GCP Principles are compatible with at least one of the all of the SA Objectives which means that each Principle is contributing to sustainable development to a certain extent. 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.</p> <p>SA Recommendations: The Principles could be enhanced by including wording that seeks to minimise waste generation and promotes the waste hierarchy.</p>																									

Appendix IV: Draft SA of Site Allocations

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
+ ?	Another example is that an option could have the potential for a minor positive effect against SA Objective 1 (Biodiversity) through improvements to habitats; however, there is also an element of uncertainty as the precise nature and scale of potential provisions is not known at this stage.	
--	+	SA Objective 6 (sustainable transport & traffic) considers more than one topic and as a result the option could have a different effect upon each topic considered.

It is considered that all site options have the potential for minor positive effects against SA Objectives 2, 3, 10, 15, 21 and 22. Please refer to the SA Framework in the SA Report for full reasoning.

Site: Kings Quarter Bus Station and Market Parade Size & Approx. Capacity: 2.2ha, 0.5ha employment land & 50 dwellings Site Ref: 1																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	+	- ?	0 +	+	+	- ?	0	+	++	++	++	+	-	+	?
Summary: The site is identified to deliver 50 new dwellings and 0.5ha of new employment / retail land with the potential for minor long term positive effects against SA Objective 18 and 12-13. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004F), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. A large proportion of the site lies within a flood risk area. If development were to avoid areas of flood risk on site, then this is likely to significantly reduce the developable area. Mitigation is likely to be difficult and/or expensive, and as such it is considered that there is the potential for a residual minor negative effect against SA Objective 5 with an element of uncertainty until site level assessments have been completed.																

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Market Parade and Clarence Street, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is predominantly brownfield and does not contain any best and most versatile agricultural land with the potential for a minor positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however as the site is mostly brownfield, and given design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it contains a Scheduled Monument (Glevum Roman Colonia). The site lies wholly within an Area of Principal Archaeological Interest, and partially within the City Centre Conservation Area. There are also Listed Buildings in close vicinity of the site. It is assumed that development at the site would; avoid the Scheduled Monument; be sensitively and responsively designed to enhance the Conservation Area designation and setting of designated heritage assets; and ensure appropriate archaeological investigation prior to development. There is also the potential for minor positive effects through enhancement to the townscape, access and signage. However, at this stage, to reflect the presence of a nationally designated asset on site, and the potential for development to affect the setting of designated heritage assets, it is considered that there is the potential for a long-term minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located adjacent to the A430 which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and the site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24. The site however is located beyond 800m to existing open space with the potential for a minor long term negative effect against SA Objectives 19-20.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Quayside and Barbican (Greater Blackfriars) Size & Approx. Capacity: Part of the 'Greater Blackfriars' Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment) Site Ref: 2																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0?	0?	0?	-	+	++	+	0?	0	+	++	++	++	+	+	+	?
Summary: The site is being promoted as part of a wider regeneration area 'Greater Blackfriars' to contribute to the overall delivery of 400 new dwellings and 0.4ha of employment (retail) land, with the potential for minor long term positive effects against SA Objective 12-13 and 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004B), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16. Alney Island Local Nature Reserve (LNR) is located over 200m from the site, however the River Severn runs west of the site option and continues to flow adjacent to the LNR. Any potential effects on water quality therefore have the potential to indirectly effect ecological habitats in and around the LNR. The A430 runs immediately between the development site and the River Severn, and as development at the site is likely to increase traffic along this road, it is considered that there is the potential for minor negative effects on water quality through an increase in the associated polluting effects on surface water run-off. This therefore has the potential for minor indirect negative effects on habitats in around the River Severn and Alney Island LNR. It is recommended that site specific policy mitigation includes a requirement for lower level assessment of the potential effects of development on water quality, and requires the use of Sustainable Drainage Systems. Given the policy mitigation provided through the GCT JCS and GCP, and available at the project level, it is considered unlikely that development will lead to any significant negative effects with the potential for a residual neutral effect against SA Objectives 1 and 4, with an element of uncertainty until site level assessments have been completed. However, the cumulative effect of development in this area on the A430, River Severn, and supporting habitats, will need to be considered. The site is also located within the Surface Water Safeguard Zone, and this should be further considered alongside the potential effects on water quality discussed above. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 4.																	

The site is located partially within an area of flood risk. Development could avoid the areas of flood risk on site, however this will reduce the developable area of the site. Given mitigation provided through the GCT JCS and Draft GCP development is unlikely to lead to any significant negative effects with the potential for a residual neutral effect against SA Objective 5 with an element of uncertainty until site level assessments have been completed.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Quay Street, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for a major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8.

The site is located adjacent to the A4301 which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located wholly within an area of Principal Archaeological Interest, and also within the Barbican Conservation Area. The site is further surrounded by numerous Listed Buildings. It is assumed that development will be sensitively and responsively designed to enhance the Conservation Area designation and setting of designated heritage assets, and will ensure appropriate archaeological investigation prior to development. Development will inevitably change, to some degree, the setting of designated heritage assets, with the potential for both positive and negative effects. Given the policy mitigation provided through the GCT JCS and Draft GCP, and available at the project level, it is considered that there is the potential for a residual neutral effect against SA Objective 9 with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre offering a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Gloucester Prison (Greater Blackfriars)

Size & Approx. Capacity: Part of the 'Greater Blackfriars' Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)

Site Ref: 3

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0 ?	0 ?	-	-	+	++	+	- ?	0	+	++	++	++	+	+	+	?

Summary:

The site is being promoted as part of a wider regeneration area 'Greater Blackfriars' to contribute to the overall delivery of 400 new dwellings and 0.4ha of employment (retail) land, with the potential for minor long term positive effects against SA Objective 12-13 and 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004E), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

Alney Island Local Nature Reserve (LNR) is located over 200m from the site, however the River Severn runs west of the site option and continues to flow adjacent to the LNR. Any potential effects on water quality therefore have the potential to indirectly effect ecological habitats in and around the LNR. The A430 runs immediately between the development site and the River Severn, and as development at the site is likely to increase traffic along this road, it is considered that there is the potential for minor negative effects on water quality through an increase in the associated polluting effects on surface water run-off. This therefore has the potential for minor indirect negative effects on habitats in around the River Severn and Alney Island LNR. It is recommended that site specific policy mitigation includes a requirement for lower level assessment of the potential effects of development on water quality, and requires the use of Sustainable Drainage Systems. Given further policy mitigation provided through the GCT JCS and GCP, and available at the project level, it is considered unlikely that development will lead to any significant negative effects with the potential for a residual neutral effect against SA Objectives 1 and 4, with an element of uncertainty until site level assessments have been completed. However, the cumulative effect of

development in this area on the A430, River Severn, and supporting habitats, will need to be considered. The site is also located within the Surface Water Safeguard Zone, and this should be considered alongside the potential effects on water quality discussed above. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 4.

The site is almost entirely located within a flood risk area, which would be difficult to avoid, mitigation may be difficult and/or expensive. Potential for a residual long term minor negative effect against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Quay Street, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for a major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given that the site is entirely brownfield, and the design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive against SA Objective 8. The site is also a sensitive heritage setting, it lies wholly with an Area of Principal Archaeological Interest and the Barbican Conservation Area. The prison on site also contains 5 Listed Buildings/Structures (Grade II and Grade II*). It is assumed that Listed Buildings/Structures on site would be retained in development, however, inevitably development at the site would result in a material change of use and is likely to affect the setting of designated heritage assets to some degree, with the potential for both positive and negative effects. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. At this stage of assessment however, taking a precautionary approach, it is considered that development has the potential for minor long-term negative effects on designated heritage assets and their setting (SA Objective 9), with an element of uncertainty until site level assessment have been completed.

The site is located adjacent to the A4031 which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800 meters of the City Centre offering a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect

against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Ladybellegate Street Car Park (Greater Blackfriars)

Size & Approx. Capacity: Part of the 'Greater Blackfriars' Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)

Site Ref: 4

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	0	+	-	+	+	- ?	0	+	++	++	++	+	+	+	?

Summary:

The site is being promoted as part of a wider regeneration area 'Greater Blackfriars' to contribute to the overall delivery of 400 new dwellings and 0.4ha of employment (retail) land, with the potential for minor long term positive effects against SA Objective 12-13 and 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004B), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken prior to development.

The site is located within the Surface Water Safeguard Zone. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect

against SA Objective 4. The site is not located within an identified flood zone, and it not known to be at risk of surface water flooding. Potential for a long term minor positive against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Quay Street and Ladybellegate Street, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is predominantly developed brownfield land with no best and most versatile agricultural land. Potential for a minor positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly developed brownfield land and the design standards outlined in policies in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it contains two Scheduled Monuments (Glevum Roman Colonia) and is located wholly within an area of Principal Archaeological Interest and the Barbican Conservation Area. The site is also surrounded by numerous Listed Buildings. It is assumed that development at the site would; avoid the Scheduled Monument; be sensitively and responsively designed to enhance the Conservation Area designation; and ensure appropriate archaeological investigation prior to development. There is also the potential for minor positive effects through enhancement to the townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage, to reflect the presence of a nationally designated asset on site, and the potential for development to affect the setting of designated heritage assets, it is considered that there is the potential for a long-term minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located adjacent to the A4031 which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Longsmith Street Car Park (Greater Blackfriars)

Size & Approx. Capacity: Part of the 'Greater Blackfriars' Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)

Site Ref: 5

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	0	+	- +	++	+	- ?	0	+	++	++	++	+	+	+	?

Summary:

The site is being promoted as part of a wider regeneration area 'Greater Blackfriars' to contribute to the overall delivery of 400 new dwellings and 0.4ha of employment (retail) land, with the potential for minor long term positive effects against SA Objective 12-13 and 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004F), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken prior to development.

The site is located within the Surface Water Safeguard Zone. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 4. The site is not located within an identified flood zone, and is known to be at risk of surface water flooding. Potential minor positives against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Ladybellegate Street, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for a major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GTC JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it contains two Scheduled Monuments (Glevum Roman Colonia) and is located wholly within an area of Principal Archaeological Interest and the Barbican Conservation Area. The site is also surrounded by numerous Listed Buildings. It is assumed that development at the site would; avoid the Scheduled Monument; be sensitively and responsively designed to enhance the Conservation Area designation and settings of designated heritage assets; and ensure appropriate archaeological investigation prior to development. There is also the potential for minor positive effects through enhancement to the townscape, access and signage. Mitigation provided through the GTC JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage, to reflect the presence of a nationally designated asset on site, and the potential for development to affect the setting of designated heritage assets, it is considered that there is the potential for a long-term minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre which contains a wide range of goods and services with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: The Fleece (Greater Blackfriars)

Size & Approx. Capacity: Part of the 'Greater Blackfriars' Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)

Site Ref: 6

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	0	+	-	+	++	+	- ?	-?	+	++	++	+	+	+	+	?

Summary:

The site is being promoted as part of a wider regeneration area 'Greater Blackfriars' to contribute to the overall delivery of 400 new dwellings and 0.4ha of employment (retail) land, with the potential for minor long term positive effects against SA Objective 12-13 and 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004F), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken at the site prior to development.

The site is located within the Surface Water Safeguard Zone. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a long term minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Ladybellegate Street, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for a major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it is located within the City Centre Conservation Area and an Area of Principal Archaeological Interest, it contains two Listed Buildings and is surrounded by many more. There are also 4 Scheduled Monuments in close vicinity. It is assumed that development at the site would; retain the Listed Buildings; be sensitively and responsively designed to enhance the Conservation Area designation and setting of designated heritage assets; and ensure appropriate archaeological investigation prior to development. There is also the potential for minor positive effects through enhancement to the townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage, to reflect the presence of a nationally designated asset on site, and the potential for development to affect the setting of designated heritage assets, it is considered that there is the potential for a long-term minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Southgate Moorings (Greater Blackfriars)

Size & Approx. Capacity: Part of the 'Greater Blackfriars' Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)

Site Ref: 7

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25

Appraisal Summary	0 ?	0 ?	0	-	+	++	+	- ?	0	+	++	++	++	+	+	-	?
Summary:	<p>The site is being promoted as part of a wider regeneration area 'Greater Blackfriars' to contribute to the overall delivery of 400 new dwellings and 0.4ha of employment (retail) land, with the potential for minor long term positive effects against SA Objective 12-13 and 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004B), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.</p> <p>Alney Island Local Nature Reserve (LNR) is located over 200m from the site, however the Docks are adjacent to the development site, connecting to the River Severn which continues to flow adjacent to the LNR. Any potential effects on water quality therefore have the potential to indirectly effect ecological habitats in and around the LNR. It is recommended that site specific policy mitigation includes a requirement for lower level assessment of the potential effects of development on water quality, and requires the use of Sustainable Drainage Systems. Given further policy mitigation provided through the GCT JCS and GCP, and available at the project level, it is considered unlikely that development will lead to any significant negative effects with the potential for a residual neutral effect against SA Objectives 1 and 4, with an element of uncertainty until site level assessments have been completed. The site is also located within the Surface Water Safeguard Zone, and this should be considered alongside the potential effects on water quality discussed above. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 4.</p> <p>The site is located adjacent to Gloucester Docks which is an identified flood zone. Mitigation provided through the GCT JCS and Draft GCP, and available at the project level, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 5.</p> <p>Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Southgate Street, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.</p> <p>The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for a major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it is located within the Southgate Street Conservation Area, and an Area of Principal Archaeological Interest, it contains a Listed Building and is adjacent to numerous others. The site is also in close vicinity to Scheduled Monuments within</p>																

the City Centre Conservation Area. It is assumed that development at the site would; retain the Listed Building; be sensitively and responsively designed to enhance the Conservation Area designation; and ensure appropriate archaeological investigation prior to development. There is also the potential for minor positive effects through enhancement to the townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage, to reflect the presence of a nationally designated asset on site, and the potential for development to affect the setting of designated heritage assets, it is considered that there is the potential for a long-term minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located adjacent to the A301 which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is however located over 800m from the closest existing educational facility with the potential for a minor negative effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Victoria Docks (Greater Blackfriars)

Size & Approx. Capacity: Part of the 'Greater Blackfriars' Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)

Site Ref: 8

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	

Appraisal Summary	0 ?	0 ?	0	-	+	++	+	0 ?	0	+	++	+	++	+	+	+	?
Summary:	<p>The site is being promoted as part of a wider regeneration area 'Greater Blackfriars' to contribute to the overall delivery of 400 new dwellings and 0.4ha of employment (retail) land, with the potential for minor long term positive effects against SA Objective 12-13 and 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.</p> <p>Alney Island Local Nature Reserve (LNR) is located over 200m from the site, however the Docks are adjacent to the development site, connecting to the River Severn which continues to flow adjacent to the LNR. Any potential effects on water quality therefore have the potential to indirectly effect ecological habitats in and around the LNR. It is recommended that site specific policy mitigation includes a requirement for lower level assessment of the potential effects of development on water quality, and requires the use of Sustainable Drainage Systems. Given further policy mitigation provided through the GCT JCS and GCP, and available at the project level, it is considered unlikely that development will lead to any significant negative effects with the potential for a residual neutral effect against SA Objectives 1 and 4, with an element of uncertainty until site level assessments have been completed. The site is also located within the Surface Water Safeguard Zone, and this should be considered alongside the potential effects on water quality discussed above. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 4.</p> <p>The site contains an area of flood risk along the northern boundary. It is considered that development could avoid this area of the site and that mitigation provided through GCT JCS and GCP policies should ensure that development will not lead to any significant negative effects with the potential for a residual neutral effect against SA Objective 5.</p> <p>Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Southgate Street, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.</p> <p>The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for a major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it is located within The Docks Conservation Area and an Area of Principal Archaeological Interest. The site is also in close vicinity to Listed Buildings. It is assumed that development at the site would; be sensitively and responsively designed to enhance the Conservation Area designation and setting of Listed Buildings; and ensure appropriate archaeological</p>																

investigation prior to development. There is also the potential for minor positive effects through enhancement to the townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. It is considered that there is the potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: 104 Northgate Street Size & Approx. Capacity: 0.06ha, 50m ² employment land & 20 dwellings Site Ref: 9																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenities	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	0	+	0?	0	+	+	0?	0	+	++	++	++	+	+	+	?
Summary: The site is identified to deliver 20 new dwellings and 50m ² of commercial land with the potential for minor long term positive effects against SA Objectives 18 and 12-13. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004F), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.																

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The northern and eastern areas of the site are located within an area of flood risk. Development can avoid areas of flood risk on site, however this will reduce the developable area. Mitigation provided through the GCT JCS and Draft GCP policies should ensure that development will not lead to any significant negative effect from occurring with the potential for a residual neutral effect against SA Objective 5 with an element of uncertainty until site level assessments have been completed.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Market Street and Worcester Street, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The majority of the site is brownfield and does not contain any best and most versatile agricultural land. Potential for minor positive against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it is located within the London Road Conservation Area as well as an Area of Principal Archaeological Interest. Adjacent to the site is a Listed Building. Development at the site has the potential to negatively affect the setting of the Listed Building, however it is assumed that development at the site would; be sensitively and responsively designed to enhance the Conservation Area designation and setting of the Listed Building; and ensure appropriate archaeological investigation prior to development. There is also the potential for minor positive effects through enhancement to the townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. Less than 100 meters to the South West of the site is a Scheduled Monument, however given existing development between the Scheduled Monument and the site it is considered unlikely that development will lead to any significant effects. Overall it is considered that there is the potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect

against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land at 'The Wheatridge'
Size & Approx. Capacity: 2.28ha, 50 dwellings and open space
Site Ref: 10

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	+	0	+	-	-	0	0	0	+	+	++	+	+	+	?

Summary:

The site is identified to deliver 50 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain any existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within a designated flood zone, and is not known to be at risk of surface water flooding. Potential for a long term minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated

AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Wheatway and The Wheatridge East, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site does not contain any best and most versatile agricultural land; however, development would result in the loss of greenfield land with the potential for a long term minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown however as the site is entirely greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. The site does not contain and is not located in close proximity to any designated heritage assets, development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located within 800 meters of both a District Centre and a Local Centre and the services and facilities on offer, with the potential for a minor positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Norville site, Tarrington Road

Size & Approx. Capacity: 0.84ha, 60 dwellings

Site Ref: 11

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	+	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	+	0	0	+	++	+	0?	0	0	++	++	++	+	+	+	?

Summary:

The site is identified to deliver 60 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Barton and Tredworth 008B), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located partially within a flood zone area along the eastern border. It is considered that development could avoid this area of the site, and mitigation provided through GCT JCS and GCP policies should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Tredworth Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for major positive against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site does not contain any designated heritage assets; however, it is located adjacent to a Listed Building which development has the potential to affect the setting of. It is assumed that development at the site would be sensitively and responsively designed to enhance the setting of the Listed Building and it is recognised that there is also the potential for minor positive effects from improvements to townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. Overall it is considered that there is the potential for residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for

major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Helipebs, Sisson Road Size & Approx. Capacity: 1.6ha, 53 dwellings Site Ref: 12																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	+	0	+	++	+	0	0	0	+	+	+	+	+	+	?
Summary: The site is identified to deliver 53 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a long term minor positive effect against SA Objective 5.																	

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Elmbridge Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely brownfield and does not contain any best and most versatile agricultural land. Potential for major positive against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site does not contain, and is not located in close proximity to any designated heritage assets. Development is unlikely to affect any heritage setting with the potential for a neutral effect against SA Objective 9.

The site is located adjacent to a railway line which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800m of a Local Centre which offers a small range of service and facility provisions with the potential for a minor positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. It is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Former Civil Service Club

Size & Approx. Capacity: 3.6ha, 60 dwellings and open space

Site Ref: 13

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	--	0	+	-	-	0?	0	0	-	+	+	+	+	+	?

Summary:

The site is identified to deliver 60 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located entirely within a flood zone. It is considered that development would not be able to avoid building on the flood zone and mitigation could be expensive and/or difficult. Potential for a major negative effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Estcourt Road and Kingsholm Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site does not contain any best and most versatile agricultural land; however, development would result in the loss of greenfield land with the potential for a long term minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely greenfield land it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. The site is located within an Area of Principal Archaeological Interest and there are a number of Listed

Buildings adjacent to the site. It is assumed that development at the site would be sensitively and responsively designed to enhance the setting of Listed Buildings and ensure appropriate archaeological investigation prior to development. 150 meters to the west of the site is a Scheduled Monument, however given the existing development between the site and Scheduled Monument, development is considered unlikely to lead to any significant negative effects. Overall it is considered that there is the potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is not located within reasonable walking distance (800m) of services and facilities within the City Centre or any local or District Centres with the potential for a minor negative effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: 67-69 London Road																
Size & Approx. Capacity: 0.35ha, 30 dwellings																
Site Ref: 14																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	+	+	0	+	+	0?	0	0	++	++	+	+	+	+	?
Summary: The site is identified to deliver 30 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Kingsholm and Wotton 002C), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.																

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and it not known to be at risk from surface water flooding. Potential for a long term minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along London Road, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is predominantly brownfield with no best and most versatile agricultural land. Potential for minor positive effects against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is located within a sensitive heritage setting, it is located within the London Road Conservation Area and is also located in an Area of Principal Archaeological Interest. It is assumed that development at the site would; be sensitively and responsively designed to enhance the Conservation Area designation; and ensure appropriate archaeological investigation prior to development. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. Although there are Listed Buildings in close proximity to the site, development is unlikely to have a negative effect on their setting due to the distance, and the existing development between them. Potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. It is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Wessex House (Railway Corridor) Size & Approx. Capacity: 0.25ha, Station car park/infrastructure Site Ref: 15																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenities	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	+	+	-?	+	++	+	0	0	0	0	0	0	0	0	0
Summary: The site is promoted to deliver new car parking spaces and infrastructure supporting the regeneration of the Kings Quarter and bus station area. The nature of the development as car parking is unlikely to lead to any significant effects on the topics of economy & employment (SA Objectives 12-13), City Centre and Local Centres (SA Objective 14), inequalities (SA Objective 16), health (SA Objective 17), housing (SA Objective 18), public open space (SA Objectives 19-20), education (SA Objective 24) or cultural heritage (SA Objective 25) with the potential for a neutral effect against these objectives. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a long term minor positive against SA Objective 5. Development of car parking is likely to increase the number of vehicles accessing the site, with the potential for minor negative effects on local roads, and minor indirect negative effects on air quality. The site is not located in close proximity to a designated AQMA, and mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage to reflect the potential for increased car usage in and around the site, it is considered that there is the potential for a residual minor negative effect against SA Objective 6a																

with an element of uncertainty until site levels assessments have been completed. The site is located within 800m of the train station which can support access to this mode of transport for longer distance journeys with the potential for a minor positive effect against SA Objective 6b.

The site is entirely brownfield with no best and most versatile agricultural land. Potential for major positive effects against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as entirely brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is partially located in an Area of Principal Archaeological Interest on the north western side. Given policy mitigation, it is assumed that development at the site would ensure appropriate archaeological investigation prior to development. Potential for a residual neutral effect against SA Objective 9.

Site: Former Telecom House (Railway Corridor)
Size & Approx. Capacity: 0.63ha, Station carpark/infrastructure
Site Ref: 16

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenities	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	+	-?	+	++	+	0	0	0	0	0	0	0	0	0	0	?

Summary:

The site is promoted to deliver new car parking spaces and infrastructure supporting the regeneration of the Kings Quarter and bus station area. The nature of the development as car parking is unlikely to lead to any significant effects on the topics of economy & employment (SA Objectives 12-13), City Centre and Local Centres (SA Objective 14), inequalities (SA Objective 16), health (SA Objective 17), housing (SA Objective 18), public open space (SA Objectives 19-20), education (SA Objective 24) or cultural heritage (SA Objective 25) with the potential for a neutral effect against these objectives.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a long term minor positive against SA Objective 5.

Development of car parking is likely to increase the number of vehicles accessing the site, with the potential for minor negative effects on local roads, and minor indirect negative effects on air quality. The site is not located in close proximity to a designated AQMA, and mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage to reflect the potential for increased car usage in and around the site, it is considered that there is the potential for a residual minor negative effect against SA Objective 6a with an element of uncertainty until site levels assessments have been completed. The site is located within 800m of the train station which can support access to this mode of transport for longer distance journeys with the potential for a minor positive effect against SA Objective 6b.

The site is entirely brownfield with no best and most versatile agricultural land. Potential for major positive effects against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely brownfield, and given design standards outlined in GCT JCS and Draft GCP policies it is considered that there is the potential for a minor positive effect against SA Objective 8. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.

Site: Great Western Road Sidings (Railway Corridor)

Size & Approx. Capacity: 4.34ha, 100 dwellings

Site Ref: 17

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	+	+	- +	+	+	0	0	0	++	+	+	++	+	+	?

Summary:

The site is identified to deliver 100 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as predominantly brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a long term minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Great Western Road and Horton Road, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is predominantly brownfield land with no best and most versatile agricultural land. Potential for a minor positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is partially located in an Area of Principal Archaeological Interest on the eastern side. Given policy mitigation provided in the Draft GCP it is assumed that development at the site would ensure appropriate archaeological investigation prior to development with the potential for a residual neutral effect against SA Objective 9.

The site is located adjacent to a railway line which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. It is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is also located within 800m of existing open space with the

potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Former Bishops College Size & Approx. Capacity: 9.18ha, 108 dwellings (to include retained playing pitches) Site Ref: 18																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	0	-	+	-	-	0	0	0	-	+	+	++	+	+	?
Summary: The site is identified to deliver 108 new dwellings with the potential for a major long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located partially within an area of flood risk along the northern boundary of the site, and there are minor areas on site at risk of surface water flooding. It is considered that development could avoid the area of flood risk on site, and mitigation provided through the GCT JCS and GCP should ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 5.																	

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Estcourt Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site contains some previously developed land, however, the majority of the site is greenfield. The site is not known to contain best and most versatile agricultural land, however, the loss of greenfield land is considered to have the potential for a minor long term negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is predominantly greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development within a previously undeveloped area. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect any heritage settings with the potential for a neutral effect against SA Objective 9.

The site is not located within reasonable walking distance (800m) of service and facility provisions within the City Centre or any Local or District Centres with the potential for a minor negative effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land at Leven Close																
Size & Approx. Capacity: 1.4ha, 20 dwellings																
Site Ref: 19																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage

	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	+	0	+	++	+	-?	0	0	++	+	+	+	+	+	?

Summary:

The site is identified to deliver 20 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located in an identified flood zone and is not known to be at risk of surface water flooding, with the potential for a minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Paygrove Lane, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely brownfield with no best and most versatile agricultural land. Potential for major positive effects against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is located in a sensitive heritage setting, it is located in the City Centre Conservation Area and also within an Area of Principal Archaeological Interest. Within the site itself there are also 2 Scheduled Monuments (Glevum Roman Colonia) and there are a number of Listed Buildings in close proximity to the south west of the site. It is assumed that development at the site would; avoid the Scheduled Monuments; be sensitively and responsively designed to enhance the Conservation Area designation and setting of designated heritage assets; and ensure appropriate archaeological investigation prior to development. There is also the potential for minor positive effects through enhancements to townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage, to reflect the presence of 2 nationally designated assets on site, it is considered that there is the potential for a long-term minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800m of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land East of Waterwells

Size & Approx. Capacity: 16.04ha, 150 Dwellings

Site Ref: 20

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6		7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	0	+	0	-	-	--	-	0	0	0	+	+	-	++	+	+	?

Summary:

The site is identified to deliver 150 new residential dwelling with the potential for a major long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone, however there is an area around the stream running through the middle of the site that has a medium to high risk of surface water flooding. Development could avoid this area of the site

and mitigation provided through GCT JCS and Draft GCP policies should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of national cycle routes and Public Rights of Way, however, it is located beyond 800m to a connection to modes of public transport (bus or train) and as such is considered to have the potential for a minor negative effect against SA Objective 6b.

The site is predominantly greenfield and contains some Grade 3a agricultural land. Development could result in the permanent loss of best and most versatile agricultural land with the potential for a major negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. The site is located within an Area or Archaeological Interest, given policy mitigation provided in the Draft GCP it is assumed that there would be appropriate archaeological investigation prior to development with the potential for a residual neutral effect against SA Objective 9.

The site is located adjacent to a railway line which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located just within 800 meters of a Local Centre with the potential for a minor positive effect against SA Objective 14. Although the site is located within 800m of promoted walking routes, it is located beyond 800m to an existing medical facility with the potential for a minor negative effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land at Clearwater Drive
Size & Approx. Capacity: 2.09ha, 30 dwellings and open space
Site Ref: 21

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	-	+	0	0	+	-	-	0	0	0	+	+	++	+	+	+	?

Summary:

The site is identified to deliver 30 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

A large part of the site contains The Causeway Key Wildlife Site, if development were to avoid the designated area, then this would significantly reduce the developable area of the site. Development could therefore result in the loss of locally designated land with the potential for a minor negative effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone however a large part of the site is of medium to high risk from surface water flooding. Mitigation provided through GCT JCS and Draft GCP policies should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect on SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Severn Vale Drive, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely greenfield however it does not contain any best and most versatile agricultural land. Potential for minor negative against SA Objective 8. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located within 800m of services and facilities within a District Centre with the potential for a minor positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land South of Grange Road

Size & Approx. Capacity: 16.55ha, 250 dwellings

Site Ref: 22

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenities	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	+	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	0	+	0	-	+	-	-	0	0	0	+	+	++	++	+	+	?

Summary:

The site is identified to deliver 250 new dwellings with the potential for a major long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located partially within an area of flood risk along the southern border (fluvial and surface water flood risk), and is also adjacent to another area of flood risk north of the site. It is considered that development could avoid the area of

flood risk on site, and mitigation provided through the GCT JCS and GCP should ensure that there will be no significant negative effects, with the potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Chatsworth Avenue and Robert Raikes Avenue, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is not known to contain any best and most versatile agricultural land, however development could result in the loss of greenfield land, with the potential for minor long term negative effects against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect a heritage setting with the potential for a neutral effect against SA Objective 9.

The site is located adjacent to a railway line which has the potential for minor negative effects on the amenity of future residents. Mitigation provided through the GCT JCS and GCP, and available at the project level (including an appropriate buffer), should ensure that development will not lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 11.

The site falls within 800 meters of 3 different Local Centres with the potential for a minor positive effect against SA Objective 14. It is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Spinnaker Park

Size & Approx. Capacity: 8.88ha, 2.54ha employment land

Site Ref: 23

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	--	0	+	+	+	0	-	+	++	+	++	0	+	+	?

Summary:

The site is identified to deliver 2.54ha of employment development with the potential for a minor positive effect against SA Objectives 12-13. The delivery of new employment land can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located entirely within a flood zone. It is considered that development would not be able to avoid building on the flood zone and mitigation could be expensive and/or difficult. Potential for a major negative effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hempsted Lane and St Ann Way, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is predominantly brownfield with no best and most versatile agricultural land, potential for minor positive against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8.

The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect any heritage setting with the potential for a neutral effect against SA Objective 9.

The site is located in close proximity to Hempsted waste landfill site which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Secunda Way Industrial Estate																	
Size & Approx. Capacity: 0.7ha, 0.7ha employment land																	
Site Ref: 24																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	0	0	+	-	-	0	0	+	++	+	++	0	+	+	?
Summary: The site is identified to deliver 0.7ha of new employment development with the potential for a minor positive effect against SA Objective 12-13. The delivery of new employment land can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.																	

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is partially located within a flood zone on the northern and eastern boundaries of the site. It is considered possible for development to avoid these areas on site, and mitigation provided through the GCT JCS and GCP should ensure that there will be no significant negative effects, with the potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hempsted Lane, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is predominantly greenfield with no best and most versatile agricultural land. Potential for a minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is predominantly greenfield it is considered that development has the potential for a minor negative effect against SA Objective 8 as a result of development in an undeveloped area. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect any heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located within 800m of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land at Rea Lane, Hempsted Size & Approx. Capacity: 1.5ha, 35 dwellings Site Ref: 25																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	+	0	+	-	-	0	0	0	-	+	-	+	+	+	?
<p>Summary: The site is identified to deliver 35 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.</p> <p>The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.</p> <p>The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a long term minor positive effect against SA Objective 5.</p> <p>Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hempsted Lane, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.</p> <p>The site land is entirely greenfield; however, it does not contain any best and most versatile agricultural land. Potential for minor negative against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. The site does not</p>																	

contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect any heritage settings with the potential for a neutral effect against SA Objective 9.

The site is not located within reasonable walking distance (800m) of services and facilities within the City Centre, or any local or District Centres with the potential for a minor negative against SA Objective 14. Although the site is located within 800m of promoted walking routes, it is located beyond 800m to an existing medical facility with the potential for a minor negative effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land adjacent to Eastgate Shopping Centre

Size & Approx. Capacity: 0.32ha, 0.5ha employment land

Site Ref: 26

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	+	+	0	+	+	- ?	0	+	++	++	++	0	+	+	?

Summary:

The site is identified to deliver up to 0.5ha of new employment / retail land with the potential for a minor long term positive effect against SA Objective 12-13. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004F), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance

biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken at the site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and it not known to be at risk of surface water flooding. Potential for a minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Brunswick Road and Parliament Street, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is predominantly brownfield with no best and most versatile agricultural land. Potential for a minor positive against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield, and design standards outlined in policies provided in the GCT JCS and Draft GCP it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is also a sensitive heritage setting, it is located in the City Centre Conservation Area and also within an Area of Principal Archaeological Interest. Within the site itself there are 2 Scheduled Monuments (Glevum Roman Colonia). Just outside the boundary, south east of the site is a Scheduled Monument (Roman wall remains) and to the north west of the site is another Scheduled Monument (Greyfriars Church). There are also a number of Listed Buildings within close proximity of the site. It is assumed that development at the site would; avoid the Scheduled Monuments; be sensitively and responsively designed to enhance the Conservation Area designation and designated heritage asset settings; and ensure appropriate archaeological investigation prior to development. It is considered that there is also the potential for minor positive effects through enhancement to townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage, to reflect the presence of nationally designated assets on site, and the potential for development to affect the setting of designated heritage assets, it is considered that there is the potential for a long-term minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800 meters of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Newark Farm Size & Approx. Capacity: 1.97ha, 48 dwellings Site Ref: 27																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	+	0	+	-	-	0?	0	0	++	+	++	+	+	+	?
Summary: The site is identified to deliver 48 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and it not known to be at risk of surface water flooding. Potential for a minor positive effect against SA Objective 5. Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and																	

ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hempsted Lane, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely greenfield with no best and most versatile agricultural land. Potential for a minor negative against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown however, as the site is entirely greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area.

The site is located within an Area of Archaeological Importance and to the northern boundary of the site there is a Listed Building. It is assumed that development at the site would be sensitively and responsively design to enhance the setting of designated heritage assets and ensure appropriate archaeological investigation prior to development. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located around 800m of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land at St Oswalds

Size & Approx. Capacity: 2.5ha, 65 dwellings

Site Ref: 28

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25

Appraisal Summary	+	+	--	0	+	+	+	0	0	0	++	++	++	+	+	+	?
<p>Summary: The site is identified to deliver 65 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Westgate 004E), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.</p> <p>The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Given the nature of the site as partially brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.</p> <p>The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located entirely within a flood zone. It is considered that development would not be able to avoid building on the flood zone and mitigation could be expensive and/or difficult. Potential for a major negative effect against SA Objective 5.</p> <p>Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services at St Oswalds Village, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.</p> <p>The site is predominantly brownfield and does not contain any best and most versatile agricultural land with the potential for a minor positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield and design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.</p> <p>The site is located adjacent to a railway line which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.</p>																	

The site is located within 800m of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Allstones, Myers Road (Railway Corridor)
Size & Approx. Capacity: 6.49ha, 250 dwellings
Site Ref: 29

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenities	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	+	+	0	-	+	+	0	0	0	+	+	+	++	+	+	?

Summary:

The site identified to deliver 250 dwellings with the potential for a major long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located partially within an area of flood risk along the eastern border of the site. It

is considered that development could avoid this area of the site, and mitigation provided through GCT JCS and GCP policies should ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Horton Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is not known to contain best and most versatile agricultural land, and the majority of the site is brownfield, development therefore has the potential for a minor long term positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is predominantly brownfield and given the design standards and mitigation provided through the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect any heritage setting with the potential for a neutral effect against SA Objective 9.

The site is located adjacent to a railway line which has the potential for minor negative effects on the amenity of future residents. Mitigation provided through the GCT JCS and GCP, and available at the project level (including an appropriate buffer), should ensure that development will not lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 11.

The site is located partially within a Local Centre boundary with the potential for a minor positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Barnwood Manor

Size & Approx. Capacity: 1.95ha, 20 dwellings

Site Ref: 30

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape		The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25			
Appraisal Summary	0?	+	0	0	+	+	-	+	-	0?	0	0	+	+	--	+	+	+	?

Summary:

The site is identified to deliver 20 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

Barnwood Arboretum Local Nature Reserve is located within 200m of the site, and Wotton Brook flows between the two sites. Given the existing environmental pathway it is considered that development has the potential to affect water quality with the potential for minor indirect negative effects on the LNR. Mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems should ensure that there will be no significant negative effects, with the potential for a residual neutral effect. However, there remains an element of uncertainty until site level assessments have been completed.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. Running from east to west through the middle of the site is an area of flood risk. This area of the site is also subject to surface water flooding. It is possible for development to avoid this area of the site, and mitigation provided through GCT JCS and Draft GCP policies should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Barnwood Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is a roughly equal split of brownfield and greenfield with the potential for both minor positive and minor negative effects against SA Objective 7. There is no best and most versatile agricultural land on the site. At this stage, the Landscape/Townscape sensitivity of the site is unknown. It is considered

that there is the potential for both minor positive and minor negative effects against SA Objective 8 through the regeneration of brownfield land and through development in a previously undeveloped area. The site is located within an Area of Principal Archaeological Importance and to the north of the site there is a Listed Building. Given policy mitigation provided through the Draft GCP it is assumed that development at the site would be sensitively and responsively designed to enhance the setting of designated heritage assets and ensure appropriate archaeological investigation prior to development. Potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800m of a Local Centre with the potential for a minor positive effect against SA Objective 14. The site is located beyond 800m to existing promoted walking routes, and development at the site could result in the loss of existing medical facilities (Wheatstone Palliative Care Medical Centre) with the potential for a major negative effect against SA Objective 17. However, it should be noted that the site is located within 800m of other existing medical facilities. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Redcliffe College, Horton Road																	
Size & Approx. Capacity: 1.3ha, 20 dwellings																	
Site Ref: 31																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	+	0	+	-	-	0?	0	0	++	++	+	+	+	--	?
Summary: The site is identified to deliver 20 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located partially within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Kingsholm and Wotton 002C), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.																	

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however it is recommended that existing trees and hedgerows on site are retained where possible. Given the nature of the site as partially brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding with the potential minor positive against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Horton Road and London Road, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is predominantly greenfield with some previously developed land also present. There is no best and most versatile agricultural land on the site. Potential for minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown however as the site is predominantly greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in an undeveloped area. The site contains a Listed Building. It is assumed that development at the site would retain the Listed Building and be sensitively and responsively designed to enhance the setting. It is considered that there is also the potential for minor positive effects through enhancement to townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects with the potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located around 800m of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is also located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20.

Development at the site could result in the loss of existing educational facilities (Redcliffe College) with the potential for a major long-term negative effect against SA Objective 24. However it should be noted that there are other educational facilities within 800m of the site, however these are not at

the college educational level (nursery / early years, primary, secondary and university facilities within 800m). It should also be noted that the loss of this facility does not affect the accessibility findings in this SA for the surrounding site options against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Holly House, Barnwood Size & Approx. Capacity: 1.16ha, 34 dwellings Site Ref: 32																			
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape		The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25			
Appraisal Summary	+	+	0	0	+	+	-	+	-	0	0	0	+	++	+	+	+	+	?
Summary: The site is identified to deliver 34 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Barnwood 007E), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as predominantly brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located partially within a flood risk area in the north west of the site. It is considered that development could avoid this part of the site and mitigation provided through GCT JCS and Draft GCP policies should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 5.																			

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hawthorne Avenue and Bittern Avenue, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is neither predominantly brownfield or greenfield, but a mixture of the two. Therefore, there is the potential for both minor positive and minor negative effects against SA Objective 7. There is no best and most versatile agricultural land on the site. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, it is considered that there is the potential for both minor positive and minor negative effects against SA Objective 8 as a result of regeneration of brownfield land and development in a previously undeveloped area. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect any heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located within 800m of services and facilities within a Local Centre with the potential for a minor positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Fieldview House, Barnwood / Abby
Size & Approx. Capacity: 0.36ha, 12 dwellings
Site Ref: 33

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage

	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	+	0	+	+	+	0	0	0	+	++	--	+	+	+	?

Summary:

The site is identified to deliver 12 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Barnwood 007E), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as predominantly brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hawthorne Avenue and Bittern Avenue, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is predominantly brownfield land with no best and most versatile agricultural land on site. Potential for a minor positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is predominantly brownfield and given design standards in policies provided in the GCT JCS and Draft GCP it is considered that there is the potential for a minor positive effect against SA Objective 8. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located within 800m of services and facilities within Local Centres and a District Centre. Potential for a minor positive effect against SA Objective 14. The site is located beyond 800m to both existing medical facilities and promoted walking routes with the potential for a major negative effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land off Horton Road (NHS) Size & Approx. Capacity: 0.72ha, 21 dwellings Site Ref: 34																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	+	0	+	-	-	0?	0	0	++	+	+	+	+	+	?
Summary: The site is identified to deliver 21 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Given the nature of the site as partially brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk from surface water flooding. Potential for a minor positive effect against SA Objective 5. Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and																	

ultimately continues to improve in Gloucester. The site is located within 800m of the train station, bus services along Horton Road, national cycle routes and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site is predominantly greenfield with some previously developed land as well. There is no best and most versatile agricultural land present on the site. Potential for a minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is predominantly greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. The site does not contain and is not located adjacent to any designated heritage assets. Development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located within 800m of the City Centre which contains a wide range of service and facility provisions with the potential for a major positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Hallmark Hotel, Matson Size & Approx. Capacity: 0.43ha, 13 dwellings Site Ref: 35																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	+	0	-	++	+	0?	0	0	+	++	++	+	+	+	?

Summary:

The site is identified to deliver 13 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Matson and Robinswood 011B), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site is not known to contain any priority habitats or species, however, it is located within 200m of Matson Wood Key Wildlife Site. There are no significant ecological pathways between the sites, and given the brownfield nature of the site, development will not lead to fragmentation of ecological corridors. It is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located in an identified flood zone and is not known to be at risk of surface water flooding. Potential for a minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of national cycle routes and Public Rights of Way, however, it is located beyond 800m to a connection to modes of public transport (bus or train) and as such is considered to have the potential for a minor negative effect against SA Objective 6b.

The site is entirely brownfield, with no best and most versatile agricultural land on the site. Potential for major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, given the nature of the site as predominantly brownfield, and design standards identified in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. Adjacent to the site on the western side there is a Listed Building. Given policy mitigation provided through the GCT JCS and Draft GCP it is assumed that development would be sensitively and responsively designed to enhance heritage setting with the potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800m of a Local Centre with the potential for minor positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land adjacent to St Aldates Size & Approx. Capacity: 0.5ha, 20 dwellings Site Ref: 37																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	+	+	+	0	+	-	-	0?	0	0	+	++	++	+	+	+	?+
Summary: The site is identified to deliver 20 new dwellings with the potential for a minor long term positive effect against SA Objective 18. As the site is also located partially within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Matson and Robinswood 008C), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16. The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as predominantly brownfield land, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a minor long-term positive effect against SA Objective 1. It is recommended that a Phase 1 Habitat Survey is undertaken on site prior to development. The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a minor positive effect against SA Objective 5.																	

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Reservoir Road and Finlay Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is predominantly greenfield with some previously developed land also on site. There is no best and most versatile agricultural land on site. Potential for minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown however as the site is predominantly greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development in a previously undeveloped area. Adjacent to the site on the northern side there is a Listed Building. Given policy mitigation provided through the GCT JCS and Draft GCP it is assumed that development would be sensitively and responsively designed to enhance heritage setting with the potential for a residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located adjacent to the A38 which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800m of services and facilities available within a Local Centre with the potential for a minor positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land East of Hempsted Lane
Size & Approx. Capacity: 3.38ha, 50 dwellings
Site Ref: 39

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage	
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	+	0	+	-	-	0?	0	0	-	+	-	+	+	+	?

Summary:

The site is identified to deliver 50 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is not located within an identified flood zone and is not known to be at risk of surface water flooding. Potential for a minor positive effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hempsted Lane, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely greenfield land with no best and most versatile agricultural land present on the site. Potential for minor negative effects against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely greenfield there is the potential for a minor negative effect against SA Objective 8 through development in a previously undeveloped area. The site is partially within the Hempsted Conservation Area. It is assumed that development would be sensitively and responsively designed to enhance the Conservation Area designation. Potential for residual neutral effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is not located within 800m of the City Centre or a Local or District Centre. Potential for minor negative effect against SA Objective 14. Although the site is located within 800m of promoted walking routes, it is located beyond 800m to an existing medical facility with the potential for a minor negative effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: MOD Site, Hempsted

Size & Approx. Capacity: 4.42ha, 85 dwellings

Site Ref: 40

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	0	+	- ?	0 +	-	-	0	-	0	++	+	++	+	+	+	?

Summary:

The site is identified to deliver 85 new dwellings with the potential for a minor long term positive effect against SA Objective 18. The delivery of new housing can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is largely covered by flood zone, with only a small area in the south of the site which is not at risk of flooding. If development were to avoid the area of flood risk on site, this would significantly reduce the developable area. Mitigation is

likely to be difficult and/or expensive. Potential for a residual minor negative effect against SA Objective 5 with an element of uncertainty until site level assessments have been completed.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Hempsted Lane, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is predominantly greenfield with a small amount of previously developed land. There is no best and most versatile agricultural land on the site. Potential for a minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is predominantly greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development within a previously undeveloped area. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located in close proximity to Hempsted waste landfill site which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800m of the City Centre and a Local Centre with the potential for a major positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Former Contract Chemicals

Size & Approx. Capacity: 9.19ha, 340 dwellings

Site Ref: 41

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	-	+	0	-	+	+	+	0	0	0	+	++	+	++	+	+	?

Summary:

The site is identified to deliver 340 new dwellings with the potential for a major long term positive effect against SA Objective 18. As the site is also located partially within one of the 10-30% most deprived Lower Level Super Output Areas (LSOAs) in Gloucester (Podsmead 009E), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16.

The site contains an area of Deciduous Woodland Priority habitat; development has the potential for minor long term negative effects on biodiversity through potential direct loss. Mitigation provided through the GCP should seek to retain the Priority habitat on site, however it is still considered that there is the potential for a residual minor negative effect on biodiversity through increased disturbance as a result of development on site.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The southern area of the site is located partially within a flood zone, and there are small areas in the middle of the site which are at risk of surface water flooding. It is considered that development would be able to avoid the area of flood risk, and that mitigation provided through GCT JCS and Draft GCP policies should ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects, given the higher capacity of the site it is considered that there is the potential for a residual minor negative effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Bristol Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is predominantly brownfield and there is no best and most versatile agricultural land on the site. Potential for minor positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is predominantly brownfield and given

design standards outlined in policies provided in the GCT JCS and Draft GCP, it is considered that there is the potential for a minor positive effect against SA Objective 8. The site does not contain and is not located in close proximity to any designated heritage assets. Development is unlikely to affect heritage settings with the potential for a neutral effect against SA Objective 9.

The site is located within 800m of services and facilities within a Local Centre with the potential for a minor positive effect against SA Objective 14. The site is located within 800m of existing medical facilities, however it is located beyond 800m to existing promoted walking routes; potential for a minor positive effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land adjacent to Wall's Factory Size & Approx. Capacity: 6.4ha, 2.79ha employment Site Ref: 44																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
Appraisal Summary	0	+	0	-	+	-	-	0	-	++	+	+	--	0	+	+	?
Summary: The site is identified to deliver 2.79ha of new employment land with the potential for a major long term positive effect against SA Objectives 12-13. The delivery of new employment land can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16.																	

The site does not contain and is not located in close proximity to any nationally or locally designated biodiversity. The site is not known to contain any priority habitats or species, however development should seek to retain existing trees and hedgerows on site where possible. Potential for a neutral effect against SA Objective 1.

The site is not located in the Surface Water Safeguard Zone, and development is unlikely to lead to any significant negative effects on water quality; potential for a minor positive effect against SA Objective 4. The site is located partially within a flood risk zone along its eastern border. This same area is also at risk of surface water flooding. Development could avoid this area of the site and that mitigation provided through GCT JCS and GCP policies should ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Nine Elms Road, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely greenfield land with no best and most versatile agricultural land on the site. Potential for minor negative effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely greenfield it is considered that there is the potential for a minor negative effect against SA Objective 8 as a result of development within a previously undeveloped area. The site is located within an Area of Principal Archaeological Importance. It is assumed that development at the site would ensure appropriate archaeological investigation prior to development. Potential for a residual neutral effect against SA Objective 9.

The site is located adjacent to a railway line and the A40, which has the potential for minor negative effects on the amenity of future residents at the site. Mitigation provided through the GCT JCS and GCP policies, and available at the project level, including an appropriate buffer, should ensure that development will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located within 800m of a Local Centre with the potential for a minor positive effect against SA Objective 14. The site is located beyond 800m to both existing medical facilities and promoted walking routes with the potential for a major negative effect against SA Objective 17. The site is located within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20, and within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

Site: Land adjacent to Dry Dock Size & Approx. Capacity: 1.35ha, 1.35ha employment Site Ref: 45																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution and Amenity	Economy & Employment	City Centre and Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25
Appraisal Summary	0 ?	0 ?	--	0 +	++	+	- ?	0	+	++	+	++	0	+	+	?
Summary: The site is identified to deliver 1.35ha of new employment land with the potential for a minor long term positive effect against SA Objectives 12-13. Potential for minor positive effect on SA Objective 12-13. The delivery of new employment land can also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16. Alney Island Local Nature Reserve (LNR) is located within 200m of the site, and the River Severn runs north of the site option and continues to flow adjacent to the LNR. The Docks are also located to the south and east of the site, providing further connections to the River Severn. Any potential effects on water quality therefore have the potential to indirectly effect ecological habitats in and around the LNR. The A430 runs immediately between the development site and the River Severn, and as development at the site is likely to increase traffic along this road, it is considered that there is the potential for minor negative effects on water quality through an increase in the associated polluting effects on surface water run-off. This therefore has the potential for minor indirect negative effects on habitats in around the River Severn and Alney Island LNR. It is recommended that site specific policy mitigation includes a requirement for lower level assessment of the potential effects of development on water quality, and requires the use of Sustainable Drainage Systems. Given further policy mitigation provided through the GCT JCS and GCP, and available at the project level, it is considered unlikely that development will lead to any significant negative effects with the potential for a residual neutral effect against SA Objectives 1 and 4, with an element of uncertainty until site level assessments have been completed. However, the cumulative effect of development in this area on the A430, River Severn, and supporting habitats, will need to be considered. The site is also located within the Surface Water Safeguard Zone, and this should be considered alongside the potential effects on water quality discussed above. It is considered that there is suitable mitigation provided through the GCT JCS and GCP, including the use of sustainable drainage systems, to ensure that there will be no significant negative effects. Potential for a residual neutral effect against SA Objective 4.																

The site is located entirely within a flood risk zone. It is considered that development would not be able to avoid the area at risk and mitigation could be difficult / expensive. Potential for a major negative effect against SA Objective 5.

Transport modelling is unavailable at this stage, however given the size of the proposed development, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 6a. The site is not located in close proximity to a designated AQMA, however the cumulative effect of development on air quality will need to be considered to ensure that air quality does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services along Southgate Street, national cycle routes and Public Rights of Way with the potential for a minor long term positive effect against SA Objective 6b.

The site is entirely brownfield land with no best and most versatile agricultural land on site. Potential for a major positive effect against SA Objective 7. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is entirely brownfield and given design standards outlined in policies provided in the GCT JCS and Draft GCP it is considered that there is the potential for a minor positive effect against SA Objective 8. The site is in a sensitive heritage setting however, it lies wholly within an Area of Principal Archaeological Interest, and within The Docks Conservation Area. There are also 4 Listed Buildings on site. It is assumed that development at the site would; retain the Listed Buildings on site; be sensitively and responsively designed to enhance the Conservation Area designation and setting of designated heritage assets; and ensure appropriate archaeological investigation prior to development. It is also considered that there is the potential for minor positive effects through enhancement to townscape, access and signage. Policy mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects. However, at this stage, to reflect the presence of 4 Listed Buildings on site, it is considered that there is the potential for a residual minor negative effect against SA Objective 9, with an element of uncertainty until site level assessments have been completed.

The site is located within 800m of the City Centre which contains a wide range of service and facility provision with the potential for a major positive effect against SA Objective 14. The site is located within 800m of both existing medical facilities and promoted walking routes, with the potential for major long-term positive effects against SA Objective 17, and within 800m of existing open space with the potential for a minor long term positive effect against SA Objectives 19-20. The site is also located within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

**Draft Gloucester City Plan
Sustainability (Integrated) Appraisal Report:**

**EQUALITY AND DIVERSITY IMPACT ASSESSMENT
SCREENING REPORT**

October 2016

enfusion



EQUALITY AND DIVERSITY IMPACT ASSESSMENT SCREENING REPORT

Draft Gloucester City Plan Sustainability (Integrated) Appraisal Report

<i>date:</i>	October 2016 Draft v02	
<i>prepared for:</i>	Gloucester City Council	
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1.0 Introduction

- 1.1 The Report sets out the process and results of a screening assessment for an Equality and Diversity Impact Assessment (EqIA) of the Draft Gloucester City Plan (GCP). The Draft GCP sets out the draft spatial Vision, Objectives to help deliver the Vision, Policies and potential Site Allocations, of the local plan for the Gloucester City area and including having regard to Gloucester's Cultural Vision and Strategy 2016-2026. Enfusion Ltd has been commissioned to carry out the screening view on behalf of the Council and as part of the Sustainability (Integrated) Appraisal (SA) of the emerging Gloucester City Plan.

Background

- 1.2 The Draft GCP has been prepared to comply with national planning policy guidance using a range of evidence and taking into account responses made to previous consultation. It is based on research into the characteristics of the Borough area, relationships with adjoining areas, past trends and future predictions.
- 1.3 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.
- 1.4 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.
- 1.5 It is important to note that assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the Sustainability (Integrated) Appraisal (SA) process. All aspects of the developing Draft GCP have been appraised against a SA framework including several SA objectives that directly and indirectly address equality, health and diversity and these include: No.6 – Sustainable Transport, No.8 – Landscape, No.9 – Historic Heritage, No.11 – Pollution, No's.12-13 – Economy & Employment, No.14 – City / Town Centres (access to services and facilities), No.16 – Inequalities, No.17 – Health and Wellbeing, No.18 – Housing, No's.19-20 – Open Space, No.22 – Participation, No.24 – Education, and No.25 – Cultural Heritage. The findings of this EqIA have been integrated into the SA of the Draft GCP and are provided separately as Appendix V to the Draft SA Report.

Consultation

- 1.6 This EqlA Screening Report will be included for consideration alongside the Draft Sustainability (Integrated) Appraisal Report and the Draft Gloucester City Plan for public consultation in 2016. Any comments received on the EqlA will be considered during the preparation of the next stages of the GCP.

Purpose and Structure of Report

- 1.7 The purpose of this Screening Report is to determine whether the Draft GCP is likely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and whether a full EqlA is required.
- 1.8 This report is structured to demonstrate compliance with the requirements of the Equality Act. Following this introductory section, the Report is organised into three further sections:
- **Section 2** - summarises the requirements of the Equality Act 2010 and the purpose of EqlA.
 - **Section 3** - outlines the Screening process and the findings of the screening assessment.
 - **Section 4** - summarises the findings of the EqlA and sets out the next steps, including consultation arrangements.

2.0 Equality and Diversity Impact Assessment: Equality Act 2010 Requirements

- 2.1 The Equality Act (2010) came into effect in October 2010 with the aim of harmonising all current discrimination law and strengthening the laws that prevent discrimination. The Equality Act applies to the provision of services and public functions and includes the development of Council policies and plans. The Act maintains the protection provided by previous legislation and therefore prevents discrimination on the basis of nine protected characteristics (previously referred to as equality strands): age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 2.2 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.
- 2.3 In summary, public authorities 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.
- 2.4 The Equality Act 2010 does not specify how public authorities should analyse the effects of their existing or new policies in relation to equality, but doing so is an important part of complying with the general duty. The approach in this Report reflects the principles of the Equality Framework for Local Government¹ and the Gloucester City Council's People Impact Assessment Tool², as applied across Gloucester, Cheltenham and Tewkesbury and other guidance provided by the Department of Health.
- 2.5 An EqlA is a tool which seeks to improve the work of a Council and ensure that the policies and plans it develops do not discriminate in the way they provide services and employment, and that where possible they do all they can to advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not.

¹ Equality and Human Rights Commission (2009) Equality Impact Assessment Guidance. Online at <http://www.equalityhumanrights.com/about-us/equality-and-diversity/our-assessments-of-impact/>

² Gloucester City Council (2012) People Impact Assessment. Online at <http://www.gloucester.gov.uk/LGNL/Jobsandcareers/Careersadvice/Equalities/PeopleImpactAssessments.aspx>

2.6 The methods and approach used for this assessment involve the following stages - outlined in Table 1. This Report outlines the method and findings for Stage 1 of the assessment - the Screening.

Table 1: Equality and Diversity Impact Assessment: Key Stages	
Stage 1	
Screening for Equality and Diversity Impact Assessment	<ul style="list-style-type: none"> ■ Identify the main purpose and aims of strategy/plan. ■ Identify other plans, programmes and assessments that have influenced the strategy/ plan in relation to equality. ■ Provide baseline information on issues and needs related to each protected characteristic or person. ■ Assess the impacts of the strategy/ plan on the protected characteristics or persons. <hr/> <ul style="list-style-type: none"> ■ <i>If no negative effects are likely then no further assessment will be required.</i> ■ <i>If there are effects are judged likely or uncertainty exists which cannot be easily mitigated – the precautionary principle applies proceed to Stage 2</i>
Stage 2	
Full Equality and Diversity Impact Assessment	<ul style="list-style-type: none"> ■ Complete additional baseline and research. ■ Agree scope and method with wider [public] stakeholders as necessary. ■ Assess strategy/plan in greater detail. ■ Provide recommendations to mitigate negative impacts. ■ Develop measures to monitor, evaluate and review (including timescale and mechanisms) the recommendations. ■ Report outcomes of EqlA and consult with wider [public] stakeholders as necessary. ■ Finalise EqlA following responses from public and implement.

3.0 Equality and Diversity Impact Assessment Stage 1: Screening

- 3.1 As detailed previously in Table 1, EqlA typically involves two stages. This Report sets out our approach and findings for Stage 1, to determine whether the Draft GCP is likely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and whether a full EqlA is required.

Approach to Equality and Diversity Impact Assessment Screening: Key Tasks

- 3.2 The process of Screening can be broken down into four main task areas. Each Task is outlined in more detail below.

Task 1: Identify the main purpose and aims of strategy/ plan – This is where a description of the strategy/ plan will be provided. The following questions will be used to set out the information required for this task. The questions are:

- What are the main aims, objectives, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
- Who implements or delivers the policy, service or function?
- Who will be affected by the strategy/ plan?

Task 2: Description of other plans, programmes and policies used to develop the strategy/ plan – This will draw out any relevant documents that have influenced the development of the strategy/ plan in relation to equality.

Task 3: Review baseline data and research – This will involve looking at relevant equalities monitoring data covering the nine protected characteristics or persons from existing databases. Any gaps will be identified.

Task 4: Screening Assessment, recording the view and the supporting information and analysis – This is where the information gained from tasks 1 to 3 is brought together to support the screening view.

The assessment uses a simplified version of the SA/SEA appraisal key applied across the strategy/ plan, with the assessment informed by decision aiding questions:

- Will the policy have a negative impact on any of the protected characteristics or persons?
- How can identified negative impacts be minimised or removed?
- How can identified positive impacts be improved or enhanced?
- Is monitoring of the issues required?

Assessment Key	
+	Positive Effect
-	Negative Effect
0	Neutral Effect
?	Unknown or Uncertain Effect

Task 1: Identify the main purpose and aims of strategy/ plan

What are the main aims objectives purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?

- 3.3 The Draft GCP sets out the proposed strategy to accommodate development allocated to the City from the higher level Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS) up to 2031. When adopted, this document will form a key part of the development plan for Gloucester City, and alongside the GCT JCS, will be used to guide decision-making on planning applications.
- 3.4 The higher level planning document the GCT JCS has also been subject to EqlA Screening during its preparation. The Screening Report³, September 2013, concluded that all of the components of the Submission JCS will lead to positive effects on the protected characteristics with no negative effects being identified. The JCS includes Strategic Objective No. 9 to promote healthy communities and this includes reducing inequalities. The draft GCP has been prepared to be in conformity with the JCS, including compliance with equality requirements.
- 3.5 The Draft GCP sets out how Gloucester City will deliver its housing and employment needs, and includes a strategic Principle to tackle poverty and deprivation. The Draft GCP includes a Vision and 14 proposed Principles to help deliver the Vision. The proposed Vision and the Principles in the Draft GCP are as follows:

GCP 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.

³ <http://www.gct-jcs.org/Documents/SustainabilityAppraisal/SA-Appendix-10-EqlA-Screening-Report2013.pdf>

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."

GCP Principles:

- 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 21st 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 locally 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.*

- 3.6 The Draft GCP proposes new development in order to deliver the scale and distribution proposed in Policies SP1 and SP2 of the Joint Core Strategy insofar as they relate to the need for development in Gloucester City outside the strategic allocations proposed in the JCS. The GCT JCS identifies 14,340 new dwellings to meet Gloucester's needs. Gloucester is unable to fully meet this need with an urban capacity for 7685 new dwellings. The GCT JCS seeks to deliver the remainder of Gloucester's identified needs through strategic allocations / urban extensions proposed in the JCS and in the process of examination. The GCP seeks to allocate the identified sites to deliver 7685 new dwellings within the city boundary.
- 3.7 The Draft GCP includes Policies that set out the local requirements that development in the GCP area will have to meet. A list of the policies are provided below:

A: Housing

- Policy A1: Use of upper floors for residential
- Policy A2: Regeneration of neighbourhoods
- Policy A3: Sub-division of plots for infill
- Policy A4: Intensification of use of existing dwellings
- Policy A5: Housing mix
- Policy A5: Student housing
- Policy A6: Housing choice for older people and supported and special needs housing
- Policy A7: Self build
- Policy A8: Static caravan sites
- Policy A9: Extensions to existing dwellings
- Policy A10: Annexes to existing dwellings

B: Economic Development

- B1: Employment & Skills Plans
- B2: Existing Employment Sites
- B3: New Employment Sites
- B4: Existing Employment Space
- B5: New Employment Space

C: Retail and the City Centre

Policy C1: Maintaining the vitality and viability of city, district and local centres

Policy C2: Proposals located within the City Centre boundary, Primary Shopping Area, primary frontages and secondary frontages

Policy C3: Visitor attractions

Policy C4: Overnight accommodation

Policy C5: Major cultural venue

Policy C6: Evening and night-time uses

D: Health and wellbeing

Policy D1: Active design

Policy D2: Outdoor space

Policy D3: Accessibility

Policy D4: Allotments

Policy D5: Open space

Policy D6: Provision of playing pitches in new development

Policy D7: Protection of open space and playing fields

Policy D8: Community facilities

Policy D9: Mobile catering units

Policy D10: Air quality

Policy D11: Noise

Policy D12: Pollution

Policy D13: Contamination

Policy D14: Cordon sanitaire

Policy D15: Suicide prevention

E: Historic Environment

Policy E1: Historic environment development management

Policy E2: Recording and advancing understanding of heritage assets

Policy E3: Buildings of local importance

Policy E4: Shopfronts, shutters and signs

F: Natural Environment

Policy F1: Landscape

Policy F2: Biodiversity

Policy F3: Nature Improvement Area

Policy F4: Trees and hedgerows

Policy F5: Green Infrastructure

Policy F6: Geodiversity

Policy F7: Flooding

Policy F8: Potential of River and Canal

Policy F9: Efficiency measures

Policy F10: Mitigation through planting and SUDs

G: Design

Policy G1: Living conditions

Policy G2: Car parking

Policy G3: Materials and finishes

Policy G4: Landscape

Policy G5: Bin storage

Policy G6: Cycle parking and storage
Policy G7: Public realm
Policy G8: Public art
Policy G9: Community safety
Policy G10: Delivering strategies
Policy G11: Development alongside main routes
Policy G12: Design standards
Policy G13: Large scale 20th century buildings
Policy G14: Transport arrival nodes
Policy G15: Gulls
Policy G16: Design and climate change
Policy G17: Views of the Cathedral

H: Sustainable transport

Policy H1: Sustainable transport

I: Infrastructure

Policy I1: Infrastructure

Who implements or delivers the policy, service or function?

- 3.8 Gloucester City Council is responsible for implementing the GCP. The Draft GCP will be subject to consultation with wider (public) stakeholders who can influence the policies in the Draft GCP.

Who will be affected by the strategy/ plan?

- 3.9 The GCP applies to the administrative area of Gloucester City Council. It will affect everyone who lives, works and visits these areas.

Task 2: Description of other plans, programmes and assessments used to develop the strategy/ plan

- 3.10 Appendix I provides a summary of each plan, programme and the policies that have influenced the GCT JCS and the Draft GCP in relation to equality. They include:

National

- National Planning Policy Framework (NPPF) (2012)
- Strong and Prosperous Communities White Paper 2006
- Our Shared Future, 2007 (Commission On Integration and Cohesion)
- Planning Policy for Traveller Sites (2015)
- Community Infrastructure Levy (Amended) (2015)
- Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society 2008
- Sustainable Communities: A Shared Agenda, A Share of the Action. A guide for Local Authorities 2007
- Healthy Lives, Healthy people: Our Strategy for Public Health in England

Regional/Sub-regional

- Leadership Gloucestershire
- Gloucestershire Health and Wellbeing Strategy 2012 – 2032 – Fit for the Future
- Your Health, Your Care – The Five-year Vision for Health and Social Care
- The Children & Young People's Partnership Plan 2015 – 2018 (CYPPP)

Local

- The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)
- Gloucester's Cultural Vision & Strategy 2016-2026
- Gloucester City Vision 2012 – 2022
- Tewkesbury Borough Council Housing and Homelessness Strategy 2012 – 2016
- Cheltenham Borough Council Housing and Homelessness Strategy 2012 - 2017
- Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA) 2014

Task 3: Review baseline data and research

- 3.11 The baseline was sourced from Gloucestershire Equality Profile 2016 (Gloucestershire County Council, 2013) which is available online at <http://www.inform.gloucestershire.gov.uk>.
- 3.12 Given that these statistics have been collated to cover the nine protected characteristics or persons based on the most up-to-date information available under the Equality Act 2010, there are not considered to be any gaps in the data.
- 3.13 The following table summarises the equality and diversity trends in Gloucester, Cheltenham and Tewkesbury areas from the Gloucestershire Population Profile 2016:
- **Age** – Cheltenham and Tewkesbury have a lower population of 0-19 year olds than the national average and Gloucester's population in this age group is higher than the other two Councils. In addition, Tewkesbury has a much higher population aged 65+ than Cheltenham. At 24.9% Gloucester has the highest representation of children and young people and exceeds the county and national average Gloucester and the national average. All the Local Authorities are moving towards an ageing population demographic.
 - **Marriage and civil partnership** – Gloucester and Tewkesbury has a lower proportion of people who are single or separated when compared to the national average. In contrast the proportion of people who are married, divorced or widowed in Tewkesbury exceeds the national average.
 - **Pregnancy and maternity** - Gloucester has the highest proportion of births to mothers aged between 20 and 24, exceeding the county

and the national average. However, Gloucester is below the county and national average with regards to birth to mothers between 30-34.

- **Race** – The majority of Gloucester's, Cheltenham's and Tewkesbury's population is white. Black or Ethnic Minorities make up a very small percentage of their populations, which is considerably lower than reported for England as a whole. Gloucester has the highest proportion of Black or Ethnic Minorities compared to the other Councils. The proportion of people that are classified as Other White is higher in Cheltenham than England as a whole. The proportion of people that are classified a Caribbean and White and Black Caribbean is higher in Gloucester than England. Tewkesbury Borough has a large number of Gypsy, Travellers and Travelling Showpeople compared with other districts in Gloucestershire.
- **Religion or belief** - Gloucester and Tewkesbury have a much higher proportion of Christians in their populations than the national average. Cheltenham has the highest proportion of Buddhists, Hindus and people who have no religion and Gloucester has the highest proportion of Muslims out of the three Councils.
- **Gender reassignment** - There are no official estimates of gender reassignment at either national or local level. However, in a study funded by the Home Office, the Gender Identity Research and Education Society estimate that somewhere between 0.6% and 1% of the UK's adult population are experiencing some degree of gender variance. This figure has been applied to all three Councils.
- **Sexual Orientation** - Estimates from the ONS Integrated Household Survey suggests that nationally Lesbian, Gay and Bisexuals represent 1.6% of people aged 16 and over. Again, this percentage was applied to all three Councils.
- **Sex** – Gloucester, Cheltenham and Tewkesbury have a slightly higher percentage of women to men in their populations than the national average.
- **Disability** - Gloucester, Cheltenham and Tewkesbury all have a lower percentage of their populations with long term limiting illness or disability than the national average.

Task 4: Screening Assessment, recording the view and the supporting information and analysis

- 3.14 The development of the GCT JCS and the Draft GCP have been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010. Furthermore, the proposed GCT JCS itself contains an objective which specifically relates to addressing social inequality and inclusivity, and providing for healthier and safer communities; the Draft GCP has been prepared in the context of this higher level plan.
- 3.15 The draft Vision, Objectives, and the Policies have been assessed to the same level of detail, taking into account the information gathered

in Task 3 to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The full assessment is contained in Appendix II.

- 3.16 A summary of the assessment for each component of the Draft GCP is provided below under each component heading.

Vision

- 3.17 The Vision is considered to lead to positive effects on all protected characteristics. It should benefit all groups as it aspires to be a place where a good quality of life is open to all. The aim for supporting health and happy communities will have positive effects on all groups improving their quality of life and meeting the needs of each group's distinctive and individual needs.

Principles

- 3.18 Generally, the Principles will have a positive effect on all protected characteristics. In particular, *'To provide a balanced network of local and district centres that provide for the everyday shops, services and facilities needed by the local community'*, *'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'*, *'To improve educational attainment, skills and learning opportunities'*, *'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'*, *'To tackle poverty and deprivation in the worst affected areas of the City'*, *'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'* and *'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'* will have greater positive effects on all social groups by improving accessibility, providing buildings which will meet their needs and be of a good quality and also providing flexible and adaptable buildings and places that are resilient to climate change and flooding. None of the Objectives are biased towards one particular protected characteristic.

Draft Gloucester City Plan Policies

- 3.19 Policies in the Draft GCP seek to ensure that all people (including protected groups) in the GCP area will have a high quality environment in which to live, work, learn and socialise.

- 3.20 Of particular importance to the protected characteristics are Policies which ensure that high quality spaces are provided as part of housing, employment and community facilities which will meet the needs of the all and are accessible to all. The policies also seek to ensure that these places are safe, vibrant, healthy and inclusive. Policies specifically concerned with health and recreation will have positive effects on the protected characteristics. Policies on employment and tourism will support health and equality aims since health/well-being is closely linked with having a job.
- 3.21 The Environmental Policies are also likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups.
- 3.22 At this stage, the Screening Assessment has not any suggestions for enhancements to strengthen the draft GCP and increase the certainty of the positive effects identified for all protected characteristics. The assessment found that the all of the components of the plan will lead to positive effects on the protected characteristics with no negative effects being identified.

Monitoring

- 3.23 Gloucestershire County Council each year publishes a number of equality progress reports demonstrating how the Council advances equality, eliminates discrimination and fosters good relations relating to their workforce, their services and ways of working. Gloucester City Council is also required to prepare a Monitoring Report which includes consideration of equality, health and diversity.
- 3.24 The proposed GCT JCS provides a separate monitoring framework that sets out key indicators and contingencies that are critical to ensure the successful delivery of the plan. These indicators and contingencies are attached to the strategic objectives and policy targets of the plan and directly and indirectly relate to equality, health and diversity. It will also be reviewed on an annual basis. Therefore, further monitoring regarding equality is not considered to be required.

4.0 Summary and Conclusions

- 4.1 The Draft Gloucester City Plan (GCP) sets out the proposed approach to accommodating development in the Gloucester City administrative area. This has been allocated according to need from the Gloucester, Cheltenham and Joint Core Strategy for the period up to 2031.
- 4.2 The development of the Draft GCP has been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010.
- 4.3 The Vision, Objectives, and Policies have been assessed to the same level of detail, taking into account the baseline information gathered to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The assessment found that the all of the components of the plan will lead to positive effects on the protected characteristics with no negative effects being identified.
- 4.4 A number of reports are already produced on an annual basis which include consideration of equality, health and diversity within the JCS area. Therefore, further monitoring regarding equality and diversity is not considered to be required.
- 4.5 The 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.
- 4.6 These findings will be subject to consultation comments from wider stakeholders alongside the Draft Gloucester City Plan: Sustainability (Integrated) Appraisal. Any comments received will be considered during the preparation of the next stages of the GCP.

Appendix I: Gloucester City Plan Equality and Diversity Impact Assessment - Plans, Programmes and Assessments

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Strong and Prosperous Communities White Paper 2006	The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship between central government, local government and local people.	There will be around 35 priorities for each area, tailored to local needs through Local Area Agreements. Instead of the many hundreds of indicators currently required by central government there will be a single set of about 200 outcome based indicators covering all important national priorities like climate change, social exclusion and anti-social behaviour. This indicator set will include citizen satisfaction and perception measures; and citizens and communities everywhere will be able to examine performance against the indicators to know how well their local area is doing.
Our Shared Future, 2007 (Commission On Integration and Cohesion)	Our Shared Future sets out our practical proposals for building integration and cohesion at a local level.	<ul style="list-style-type: none"> • Sense of shared futures • Emphasis on a new model of rights and responsibilities • New emphasis on mutual respect and civility • Deliver a visible social justice
Community Infrastructure Levy (Amended) (2015)	Provides system to fund new local infrastructure through new development. CIL is a charge that will be payable by developers when they begin construction of new developments	Confirms the funding method for delivery of major aspects of the infrastructure requirements for development.
Healthy lives, healthy people: our strategy for public health in England (2010)	This White Paper sets out the Government's long-term vision for the future of public health in England. The aim is to create a 'wellness' service (Public Health England) and to strengthen both national and local leadership.	The goal is a public health service that achieves excellent results, unleashing innovation and liberating professional leadership. This White Paper builds on Equity and Excellence: Liberating the NHS to set out the overall principles and framework for making this happen.
National Planning Policy Framework (NPPF) (2012)	The national planning policy framework aims to reform the planning system to	Local Plans should set out strategic priorities to deliver: <ul style="list-style-type: none"> ■ To deliver a mix of housing based on current and future demographic

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	<p>make it less complex and more accessible, and to promote sustainable growth. The NPPF streamlines existing Planning Policy Statements, Planning Policy Guidance Notes and circulars to form a single consolidated document which promotes sustainable development. It provides a framework within which local people and authorities can produce local and neighbourhood plans.</p>	<p>trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);</p> <ul style="list-style-type: none"> ■ Consider the needs of people with disabilities by all modes of transport.
<p>Planning for Travellers 2015</p>	<p>The document sets out the proposed new, single Planning Policy for traveller sites.</p>	<p>The new policy aims to:</p> <ul style="list-style-type: none"> ■ enable local planning authorities to make their own assessment to set their own pitch/plot targets ■ encourage local planning authorities to plan for sites over a reasonable timescale ■ protect Green Belt from development ■ reduce tensions between settled and traveller communities in the planning system ■ remove repetition of national planning policy that is set out elsewhere ■ remove unjustified differences in policy in the two circulars, and between the two circulars and other policy statements ■ remove unnecessary guidance and context so that planning policy documents contain only policy ■ ensure that local planning authorities, working together, have fair and effective strategies to meet need through the identification of land for sites ■ promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites ■ reduce the number of unauthorised developments and encampments and make enforcement more effective if local planning authorities have had regard to this policy

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
		<ul style="list-style-type: none"> ▪ ensure that the development plan includes fair, realistic and inclusive policies increase the number of traveller sites, in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply ▪ reduce tensions between settled and traveller communities in plan making and planning decisions ▪ enable provision of suitable accommodation from which travellers can access education, health, and welfare and employment infrastructure.
Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society 2008	This strategy sets out the Governments' response to the global challenge of ageing. It also outlines plans for making sure that there is enough appropriate housing available in future to relieve the forecasted unsustainable pressures on homes, health and social care services.	The vision is to prepare communities for the multiple changes that they will face; to 'future proof' society so that it does not alienate or exclude; and to allow everybody, regardless of age, to participate and enjoy their home and their environment for as long as possible. To succeed in providing appropriate housing and effective care to all in a more targeted manner, there must be a coherent, joined-up, plan – that is why we need a National Strategy for Housing in an Ageing Society.
Sustainable Communities: A Shared Agenda, A Share of the Action. A guide for Local Authorities 2007	This guide shows how local outcomes such as those reflected in the seven shared priorities, can be delivered in a way that helps create genuinely sustainable communities. It highlights the cross-cutting issues which need to be addressed for each outcome.	7 Shared Priorities: <ul style="list-style-type: none"> ▪ Creating safer and stronger communities ▪ Improving the quality of life of older people and children, young people and families at risk ▪ Meeting transport needs more effectively ▪ Promoting healthier communities and narrowing health inequalities ▪ Promoting the economic vitality of localities ▪ Raising standards across our schools ▪ Transforming the local environment
Gloucester's Cultural Vision & Strategy 2016-2026	This paper aims to promote Gloucester as a cultural hub and encourage local leaders and communities to transform the city. The paper outlines the positive impacts increased diverse cultural activity will have on the local areas economy and community regeneration.	Objective 1- Develop artists and arts organisations Objective 2- Broaden the cultural offer Objective 3- Develop a vibrant city centre Objective 4- Develop audiences Objective 5- Put Gloucester on the cultural map Objective 6- Make things happen
Leadership Gloucestershire	Leadership Gloucestershire (LG) brings together public sector organisations	

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	<p>which allocate and spend significant resources in Gloucestershire. Its role is to provide vision, leadership and strategic direction in those areas where it is vital for organisations to work together to meet the needs of the people and communities of Gloucestershire in the most cost effective way. LG will work together to reduce current costs, minimise future costs and deliver better outcomes for the benefit of the people of Gloucestershire. They will work with others to achieve their objectives.</p>	<ul style="list-style-type: none"> ■ Gloucestershire Health & Wellbeing Board - To oversee the effective functioning of the Gloucestershire Health and Wellbeing Board ■ Driving economic Growth - To work with the Gloucestershire Local Enterprise Partnership (LEP) to ensure they lead and champion the economic growth agenda. ■ Police and Crime - To maintain oversight of police and crime issues, recognising the roles of the new Independent Police and Crime Commissioner and the Police and Crime Panel as scrutiny body. ■ Planning and Infrastructure - The adoption of a "Gloucestershire family" approach to planning and infrastructure development. ■ Assets - The development of a "One Gloucestershire" approach to assets/estates. ■ Shared Services - To oversee the public sector approach to shared services. ■ Troubled Families/Community Budgets - To oversee the development of the Troubled Families/Community Budget initiatives. ■ Promoting Gloucestershire - To promote Gloucestershire and the agreed priorities.
<p>The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)</p>	<p>The original strategy was developed by the Tewkesbury Borough Local Strategic Partnership which brings together key agencies, organisations and partnerships from the public, private, community and voluntary sectors.</p> <p>The Sustainable Community Strategy plays an important role in providing the long term vision which takes into account these challenges whilst continuing to deliver our local communities priorities</p>	<p>Vision: A Borough of healthy, strong, thriving and sustainable communities, both rural and urban, where people want to live, work and visit.</p> <ul style="list-style-type: none"> ● Ambition 1: A Thriving Economy ● Ambition 2: A Healthy, Safe & Inclusive Community ● Ambition 3: A Sustainable Natural & Built Environment

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Gloucester City Vision 2012 - 2022	The Gloucester City Vision 2012- 2022 document sets out what we want to achieve for the City over the next ten years. The City Vision lays out our key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver. The City Vision will provide an overarching framework for all partner's strategic plans including important City Council documents such as the Joint Core Strategy and the Gloucester City Plan.	Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. Aims: <ul style="list-style-type: none"> • A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors. • A vibrant evening economy. • A City which improves through regeneration and development. • A City where people feel safe and happy in their community. • A healthy City with opportunities available to all.
Tewkesbury Borough Council Housing and Homelessness Strategy 2012 - 2016	The Housing and Homelessness Strategy 2012-2016 takes into account the aims of the national strategy but also considers how Tewkesbury will need to work at a more local level to make a real difference to residents across Tewkesbury Borough.	The strategy has four main themes under which a number of priority actions have been identified, each with objectives to be achieved: <ol style="list-style-type: none"> 1. Housing supply and delivery of good quality affordable housing 2. Homelessness and Homelessness Prevention 3. Housing to meet the housing needs of specific groups 4. Neighbourhoods and housing standards
Cheltenham Borough Council Housing and Homelessness Strategy 2012 - 2017	The Housing and Homelessness Strategy 2012-2017 takes into account the aims of the national strategy but also considers how Cheltenham will need to work at a more local level to make a real difference to residents across Cheltenham Borough.	Vision: 'is for residents to be able to access and maintain suitable, affordable accommodation within communities that are safer, stronger and healthier. It sets out the following priorities: <ul style="list-style-type: none"> ▪ Priority 1: To increase the provision of Affordable Housing ▪ Priority 2: To make best use of existing housing stock ▪ Priority 3: To improve access into suitable, affordable accommodation and helping households to stay in their homes for longer ▪ Priority 4: To tackle the causes of homelessness ▪ Priority 5: To create stronger, safer and healthier communities

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Gloucestershire Health and wellbeing Strategy 2012 – 2032 – Fit For The Future	The aspiration of this strategy is to continue to improve the quality of life for everyone in Gloucestershire within available resources. This is why the strategy spans 20 years, and it aims to be implemented through three-year action plans that are refreshed annually. This will enable measurement of progress in the short, medium and longer term.	Uses the life-course approach: <ul style="list-style-type: none"> ■ Starting well – with a focus on pregnancy and early years to give every child the best start in life ■ Developing Well – a focus on children and young people maximising their capabilities and control over their own lives ■ Living and Working Well – a focus on promoting healthy lifestyles; equitable access to ill-health preventative services; healthy and sustainable physical environments; building social networks and communities and access to good employment opportunities ■ Ageing Well – promoting independence, physical and mental health and wellbeing post-retirement. Under each of the above headings it sets aspirations to achieve in the Gloucestershire area.
YOUR HEALTH, YOUR CARE Our five year vision for Health and Social Care	Over the next five years Your Health, Your Care seeks to support the aspiration of the Health and Wellbeing strategy by putting in place the building blocks to ensure that we can continue to improve the quality of life for everyone in Gloucestershire.	The vision for Gloucestershire Health Community is to have: <ul style="list-style-type: none"> ■ Joined up care for the people of Gloucestershire ■ People empowered to take more control over their own care ■ Mainstream services that are accessible by all vulnerable people, wherever they may live ■ Enhanced outcomes for the population ■ Improved use of resources
Gloucestershire Children and Young People’s Partnership Plan 2015-2018	‘To ensure our children and young people thrive and reach their full potential; providing appropriate support for those families who need it most’	Our vulnerable children, young people and families have an entitlement to Early Help; Targeted Interventions and for some, Intensive Intervention to: <ul style="list-style-type: none"> ■ Enjoy the best start in life ■ Maximize their capabilities and have control over their own lives ■ Be safe from injury, exploitation and harm ■ Work well together to provide right and timely effective intervention for vulnerable children and families as early as possible

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Submission 2014	The document outlines the future of development (both housing and employment) and associated infrastructure for Gloucester, Cheltenham and Tewkesbury and their surrounding areas up until 2031.	Includes specific strategic objective for promoting healthy communities
Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA) 2014	The SA/SEA of the JCS has been ongoing since 2008 and is being undertaken alongside the preparation of the plan. This report sets out the SA/SEA of alternatives – reasons for consideration, assessment methods and findings, reasons for selection/rejection, reporting and consultation - throughout the period from 2008-2013. The JCS was assessed against a number of environmental objectives and following the assessment the contents of the JCS has been amended accordingly to reduce/ mitigate any significant impacts.	The SA Framework includes a number of Objectives which either directly or indirectly seek to reduce inequalities.

Appendix II: Equality and Diversity Impact Assessment (EqIA)

EqIA Key and Method Notes:

The assessment uses a simplified version of the SA/SEA appraisal key applied across the draft plan's policies, with the assessment informed by decision aiding questions:

- Will the policy have a negative effect on any of the protected characteristics?
- Will the policy have a negative effect on any of the protected characteristics?
- How can identified negative effect be minimised or removed?
- How can identified positive effect be improved or enhanced?
- Is monitoring of the issues required?

Assessment Key	
+	Positive Effect
-	Negative effect
○	Neutral Effect
?	Unknown or Uncertain Effect

Vision & Objectives

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Vision	+	+	+	+	+	+	+	+	+
Commentary									
<ul style="list-style-type: none"> The vision should benefit all groups as it seeks to provide a place where a good quality of life is open to all; this will have positive effects on all groups improving their quality of life and meeting the needs of each group's distinctive and individual needs. 									

Draft GCP Objectives	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
EqIA Protected Characteristics									
Plan Objectives									
1	+	+	+	+	+	+	+	+	+

Draft GCP Objectives	EqIA Protected Characteristics								
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
2	+	+	+	+	+	+	+	+	+
3	+	+	+	+	+	+	+	+	+
4	+	+	+	+	+	+	+	+	+
5	+	+	+	+	+	+	+	+	+
6	+	+	+	+	+	+	+	+	+
7	+	+	+	+	+	+	+	+	+
8	+	+	+	+	+	+	+	+	+
9	+	+	+	+	+	+	+	+	+
10	+	+	+	+	+	+	+	+	+
11	+	+	+	+	+	+	+	+	+
12	+	+	+	+	+	+	+	+	+
13	+	+	+	+	+	+	+	+	+
14	+	+	+	+	+	+	+	+	+
<p>Commentary</p> <p>Generally, the Principles will have a positive effect on all protected characteristics. In particular, 'To provide a balanced network of local and district centres that provide for the everyday shops, services and facilities needed by the local community', 'To provide a balanced mix of new homes that provide for the needs and aspirations of the local</p>									

Draft GCP Objectives EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
community, working with neighbouring authorities where they are providing for housing needs of the Gloucester community', 'To improve educational attainment, skills and learning opportunities', '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', 'To tackle poverty and deprivation in the worst affected areas of the City', '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' and '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' will have greater positive effects on all social groups by improving accessibility, providing buildings which will meet their needs and be of a good quality and also providing flexible and adaptable buildings and places that are resilient to climate change and flooding. None of the Objectives are biased towards one particular protected characteristic.									

Draft Policies

Draft GCP Policy topics EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
	Historic Environment (E1-E4)	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> These Policies are also likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. 									
Health and Wellbeing (D1-D15)	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> Strongly positive effects for all groups through provision of and access to healthy activities; additional benefits through provision of allotments with locally grown food and health/well-being benefits 									
Flooding and Water Management (F7-F10)	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> These Policies are likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. 									
Design (G1-G17)	+	+	+	+	+	+	+	+	+
Commentary									

Draft GCP Policy topics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation									
										1	2	3	4	5	6	7	8	9
<ul style="list-style-type: none"> These Policies are likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. 																		
Climate Change (F1-F10, G16)	+	+	+	+	+	+	+	+	+									
Commentary <ul style="list-style-type: none"> These Policies are likely to lead to positive effects on the protected characteristics as they aim to enhance the environment in which the protected groups live and support healthy functioning ecosystems on which people depend. This can have benefits in terms of health and cultural well-being for all groups. 																		
Natural Environment (F1-F10)	+	+	+	+	+	+	+	+	+									
Commentary <ul style="list-style-type: none"> These Policies are likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. 																		
Retail and City / Town Centres (C1-C6)	+	+	+	+	+	+	+	+	+									
Commentary <ul style="list-style-type: none"> Overall these policies should have positive benefits for all groups through increasing accessibility in the City 																		
Sustainable Transport (H1, G2, G6, G11, G14, I1)	+	+	+	+	+	+	+	+	+									
Commentary																		

Draft GCP Policy topics									
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
EqlA Protected Characteristics	1	2	3	4	5	6	7	8	9
<ul style="list-style-type: none"> Overall these policies should have positive benefits for all groups through increasing accessibility in the City 									
Economy and Employment (B1-B5)	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> Overall these policies have benefits for all groups and protected characteristics as employment is known to have positive effects on health and well-being 									
Housing (A1-A10)	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> The housing policies should benefit all groups overall as they seek to increase the availability and quality of housing in the City 									