



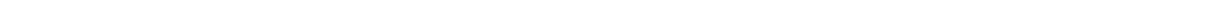
# **GLOUCESTER CITY PLAN 2011-2031**

## **SUSTAINABILITY (INTEGRATED) APPRAISAL**

**(incorporating Strategic Environmental  
Assessment, Health Impact Assessment,  
Equality Impact Assessment)**

**July 2019**

enfusion



# Gloucester City Council Gloucester City Plan (2011-2031): Pre-Submission

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

Habitats Regulations Assessment (HRA) Report is  
available separately

## Sustainability Appraisal Report July 2019

<i>date:</i>	October 2016 Draft & Final v02 July 2019 Draft v03 & Final v04	
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## 1.0 INTRODUCTION

### **Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of the Local Plan. The purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives<sup>1</sup>. Gloucester City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process (incorporating SEA) for the new Gloucester City Plan (GCP).
- 1.2 This requirement for SA is in accordance with planning legislation<sup>2</sup> and paragraph 32 of the revised National Planning Policy Framework (2018, NPPF)<sup>3</sup>. Local Plans must also be subject to Strategic Environmental Assessment<sup>4,5</sup> (SEA) and Government advises<sup>6</sup> that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail. This SA Report is part of the evidence base for the Gloucester City Plan (GCP) and it accompanies the GCP Pre-Submission on Regulation 19 consultation.

### **Health Impact Assessment (HIA) & Equality Impact Assessment (EqIA)**

- 1.3 The Council has chosen to integrate Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes, as well as SEA, within the overarching SA process. HIA is not a statutory requirement for local planning authorities but it is good practice in plan-making; health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty<sup>7</sup> to assess the impact of their policies on different population groups to ensure that discrimination does not take place and, where possible, to promote equality of opportunity.
- 1.4 For the SA of the emerging GCP, the integration of health and equality considerations has focused on ensuring that these issues are well represented in the SA Framework (through objectives and thresholds of significance) against which the developing options, policies and sites have been assessed. Health and equality issues have been addressed iteratively as the appraisal process has progressed. Details of the EqIA are presented separately to demonstrate compliance with the Equality Act (2010) in Appendix V to this SA

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<sup>1</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>2</sup> Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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

<sup>4</sup> EU Directive 2001/42/EC

<sup>5</sup> Environmental Assessment of Plans and Programmes Regulations, 2004

<sup>6</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>7</sup> UK Equality Act, 2010

Report. An initial EqlA considered the likely effects of the emerging policies and site options published in early 2016 for public consultation. This has been updated to reflect the changes made through developing the draft GCP from the Regulation 18 to the Pre-Submission Regulation 19 stage.

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

- 1.5 The Council is also required to undertake a Habitats Regulations Assessment<sup>8</sup> (HRA) of the Gloucester City Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA screening stage considers if the potential impacts arising as a result of the GCP are likely to have significant effects on these sites either alone or in combination with other plans and projects. If likely significant effects are indicated, then the relevant elements of the emerging plan are investigated through the next stage of appropriate assessment (AA).
- 1.6 The HRA process has its own legislative drivers and requirements and, while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel with the SA process but the detailed methods and findings are reported separately. Summary HRA findings are incorporated into this integrated SA Report.

### **The Gloucester City Plan (GCP) & the GCT Joint Core Strategy (JCS)**

- 1.7 Gloucester City Council, in partnership with Cheltenham Borough Council and Tewkesbury Borough Council have produced a Joint Core Strategy (JCS) that sets out the strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period 2011 to 2031) sets out the housing and employment needs for the Gloucester City area, including the 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.
- 1.8 The GCT JCS<sup>9</sup> (adopted December 2017) 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. Strategic allocations in the GCT JCS are at Policy A1 Innsworth and Twigworth, Policy A2 South Churchdown, Policy A3 North Brockworth, and Policy A6 Winnycroft.

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<sup>8</sup> Conservation of Habitats & Species Regulations (as amended 2017)

<http://www.legislation.gov.uk/uksi/2010/490/contents/made>

<sup>9</sup> <https://www.jointcorestrategy.org/>

- 1.9 The GCP allocates local sites and includes local policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031. The GCP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability Appraisal, and consultation with the public, stakeholders and the regulators.
- 1.10 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 that reported the assessment of the potential effects of the Key Development Principles against a number of SA Objectives.
- 1.11 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 City Council commissioned independent specialist consultants, Enfusion, to review and progress this SA work in June 2016.
- 1.12 The emerging draft GCP with Vision, Objectives, proposed Policies and potential site options for allocation was subject to public consultation, together with the supporting SA and HRA Reports in early 2017. The Council has considered the representations made, together with updated evidence, and further developed the draft GCP to the Pre-Submission stage.
- 1.13 The overall aspiration for the GCP is set out in the Vision and Key Principles, 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.*

*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 Key Principles:**

- 1. 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. Ensure that new development is supported by the necessary infrastructure;*
- 3. Regenerate the city centre and other areas of the city in a way that responds to and meets the needs of the 21<sup>st</sup> Century and builds upon strengths such as heritage and the waterside location;*
- 4. Build on existing strength to create a distinctive, diverse and innovative cultural, arts, tourism and sporting offer;*
- 5. Encourage a vibrant and safe evening and night-time that appeals to all age groups and interests and encourages more overnight visitors;*
- 6. Provide a balanced mix of new homes that provide for the needs and aspirations of the existing and future community;*
- 7. Encourage and facilitate inward and home-grown investment, attract innovative growth sectors, create high and stable levels of economic growth and productivity, and increase jobs and skills development opportunities;*
- 8. Improve educational attainment, skills and learning opportunities;*
- 9. Protect and enhance the city's leisure, recreation and environmental assets, including the historic environment, public open spaces, woods and trees, allotments, areas of nature conservation, sensitive landscapes, playing fields and sports facilities;*
- 10. 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;*
- 11. Ensure that development minimises its impact on climate change through sustainable construction and design, encourages the use of sustainable forms of transport and integrates with and makes the most of existing infrastructure;*

12. *Improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities;*
13. *Tackle poverty and deprivation in the worst affected areas of the city.*

1.14 The GCP then comprises themed sections with local Policies, together with a monitoring framework, as follows:

**A: Housing**

Policy A1: Effective use of land and buildings

Policy A2: Affordable housing

Policy A3: Regeneration of neighbourhoods and housing estates

Policy A4: Student accommodation

Policy A5: Housing choice for older people and supported and special needs housing

Policy A6: Accessible and adaptable homes

Policy A7: Self build and custom build homes

Policy A8: Static caravan sites

Policy A9: Extensions to existing dwellings

Policy A10: Annexes to existing dwellings

**B: Employment Development, Culture and Tourism**

Policy B1: Employment & Skills Plans

Policy B2: Safeguarding Employment Sites

Policy B3: New Employment development and Intensification of existing employment uses

Policy B4: Development within and adjacent to Gloucester Docks and canal

Policy B5: Culture and Tourism

Policy B6: Protection of public houses

**C: Healthy Communities**

Policy C1: Active design and accessibility

Policy C2: Provision of Allotments

Policy C3: Provision of open space

Policy C4: Hot food takeaways

Policy C5: Air quality

Policy C6: Cordon sanitaire

Policy C7: Fall prevention from taller buildings

Policy C8: Changing places toilets

**D: Historic Environment**

Policy D1: Historic environment

Policy D2: Recording and advancing understanding of heritage assets

Policy D3: Buildings of local importance

Policy D4: Shopfronts, shutters and signs

Policy D5: Views of the Cathedral & Historic Places of Worship

### **E: Natural Environment**

Policy E1: Landscape character and sensitivity

Policy E2: Biodiversity and geodiversity

Policy E3: Nature Recovery Area

Policy E4: Trees, woodlands and hedgerows

Policy E5: Green Infrastructure: building with nature

Policy E6: Flooding, sustainable drainage and wastewater

Policy E7: Renewable energy potential of River and Canal

Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation

### **F: Design**

Policy F1: Materials and finishes

Policy F2: Landscape and planting

Policy F3: Community safety

Policy F4: Gulls

Policy F5: Open plan estates

Policy F6: Nationally prescribed space standards

### **G: Sustainable Living, Transport & Infrastructure**

Policy G1: Sustainable transport

Policy G2: Charging infrastructure for electric vehicles

Policy G3: Cycling

Policy G4: Walking

Policy G5: Broadband connectivity

Policy G6: Telecommunications infrastructure

Policy G7: Water efficiency

Policy G8: Review mechanism

### **Site Allocations SA01- SA22**

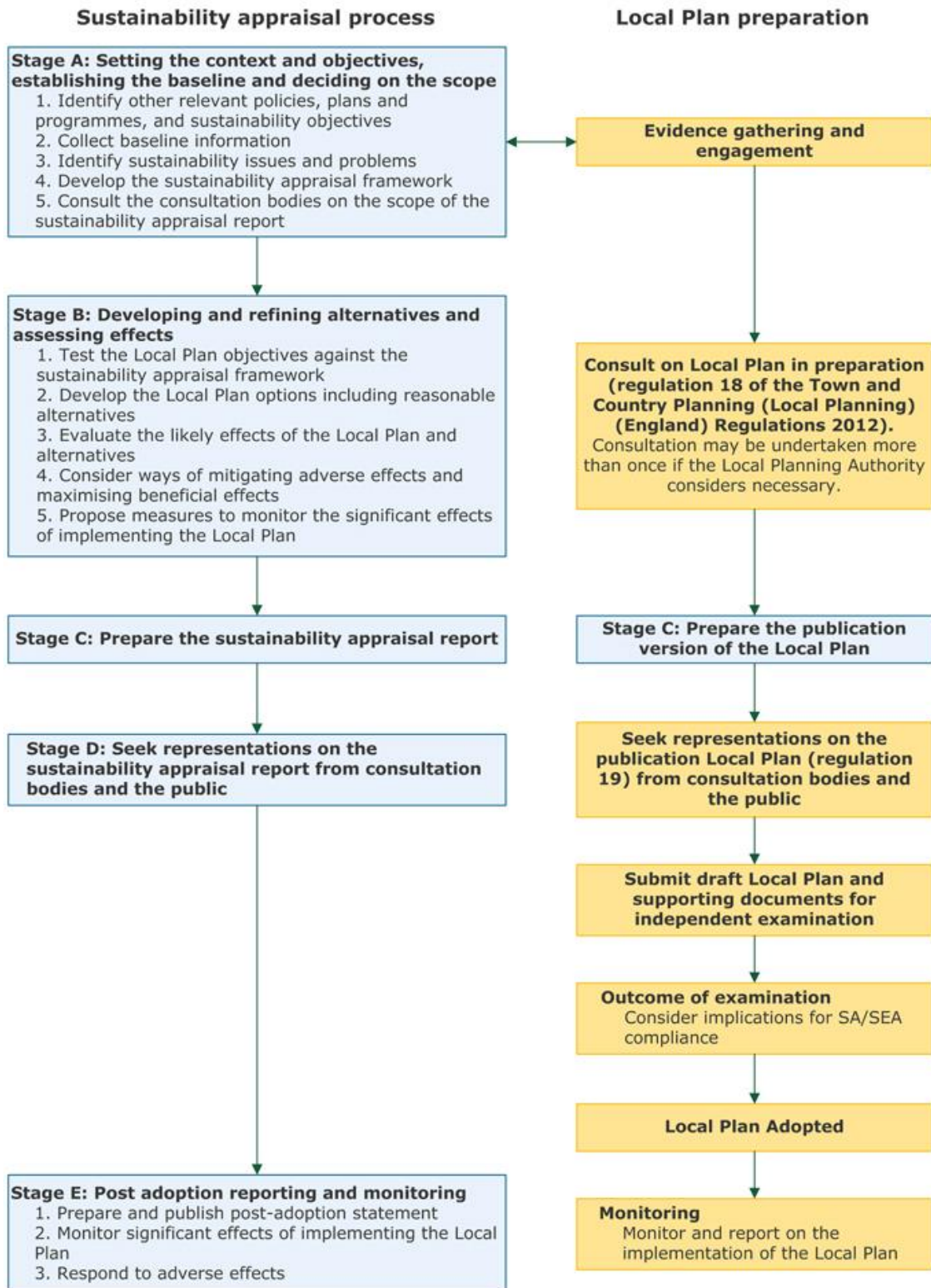
## **Inter-Relationships between SA & Plan-Making Processes**

- 1.15 National Planning Practice Guidance<sup>10</sup> sets out the key stages and tasks for SA and their inter-relationships with plan-making stages and tasks – as set out in the diagram following:

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<sup>10</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

**Figure 1.1: SA and Plan-Making Stages and Tasks**



1.16 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. As the plan develops, stages and tasks in the SA process may be revisited, updated or refreshed in order to take account of updated or new evidence, as well as consultation representations.

- 1.17 An integrated approach to appraisal brings resource efficiencies and allows complementary issues to be considered concurrently. The Government's guidance recognises value in undertaking SA and HRA concurrently (although the findings and reporting of the two processes should be kept distinct). In practice, the evidence base for both SA and HRA processes can be shared, as well as with the evidence base for the plan-making process.

### **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<sup>11</sup>. The initial draft GCP was subject to Regulation 18 consultation during January-February 2017. The SA/SEA and HRA were subject to consultation with the environmental statutory bodies (Historic England, the Environment Agency, and Natural England), as well as other stakeholders and the public. Comments received were taken into consideration and are recorded in this SA Report at Appendix VI. Thus, at each stage of the plan development, the accompanying SA Reports were published.
- 1.19 The SA studies and findings continue to inform the ongoing development of the GCP and comprise part of the evidence base for the emerging plan. SA Reports will accompany the subsequent stages of the GCP as set out in the following Table 1.1 with the chronology of the GCP preparation, consultation and the accompanying SA/SEA stages:

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

<b>GCP Stage and Documents</b>	<b>SA/SEA Stage and Documents</b>
<b>City Plan Scope</b> Consultation 23 May – 23 August 2011	
<b>City Plan Part 1</b> (development strategy and key development principles) Consultation March – April 2012	<b>Sustainability Appraisal Statement</b> February 2012 (undertaken by Gloucester City Council) Consultation March – April 2012
<b>City Plan Part 2</b> (development site options) Consultation 13 May – 12 July 2013	<b>Sustainability Appraisal Report</b> May 2013 (undertaken by Gloucester City Council) Consultation 13 May – 12 July 2013
<b>Draft Gloucester City Plan</b> Regulation 18 Consultation	<b>Sustainability Appraisal Report</b> October 2016 (undertaken by Enfusion) Regulation 18 Consultation

<sup>11</sup> <https://www.gloucester.gov.uk/planning-development/planning-policy/city-plan/>

16 January – 27 February 2017	16 January - 27 February 2017
<b>Gloucester City Plan Pre-Submission</b> Regulation 19 Consultation Autumn 2019	<b>Sustainability Appraisal Report</b> (July 2019) Consultation Autumn 2019
<b>GCP Submission</b> Later 2019/early 2020	<b>SA Report Submission</b> Later 2019/early 2020
<b>Independent Examination</b> 2020	2020
<b>Adoption</b>	<b>SA Adoption Statement</b>

## 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 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 Appraisal Report

- 1.21 This document reports the SA process for the Gloucester City Plan. Following this introductory Section 1, the report is structured into further sections:
- Section 2 describes the approach and methods used to appraise the emerging elements of the Plan
  - Section 3 summarises the sustainability context and characteristics with details available in the final SA Scoping Report (February 2015) available on the Council's website
  - Section 4 explains how options in plan-making and alternatives in SA have been addressed and reported explicitly to demonstrate compliance with the requirements of the SEA Directive
  - Section 5 summarises the findings of the initial SA of the draft policies and site options investigated as potential allocations (October 2016 Regulation 18)
  - Section 6 explains how the draft Plan has developed to take account of consultation comments made and further technical studies; summarises and discusses the SA findings; and includes summary findings for the EqIA and HRA (July 2019 Regulation 19)
  - Section 7 introduces the approach to monitoring and the SA
  - Section 8 provides summary conclusions with key findings from the SA; outlines how the SA has informed the plan-making; explains the next steps, and sets out the requirements for consultation and making comments on this SA Report that accompanies the Pre-Submission GCP on Regulation 19 consultation

- 1.22 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA are located in the SA Report. Appendix II reflects the scoping process and reports the updating of key issues for the plan with the updating of the SA Frameworks of Objectives that form the basis for assessment. Appendix III presents the details of the SAs of the Vision & Objectives (2016 & updated 2019). Appendix IV details the SA of the Options for potential Site Allocations (2016). Appendix V details the findings of the initial and updated EqIA (2016 & 2019) and provides a separate document to demonstrate compliance for the Council with the requirements of the Equality Act, 2010. Appendix VI details the representations made to the Regulation 18 SA and HRA, together with outline responses.
- 1.23 The Habitats Regulations Assessment (HRA) Report (July 2019) is a separate report to accompany the Pre-Submission Plan on the Regulation 19 consultation. A summary of the initial HRA findings is provided here in this SA Report in Section 5 (2016) and updated HRA findings are incorporated into Section 6 (2019).

## 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. 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.
- 2.2 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. SEA sets the context for subsequent project level studies during Environmental Impact Assessment (EIA) for major development projects. This tiering is acknowledged in the NPPF in paragraphs 31 and 35 in that the preparation of policies should be proportionate and supported by proportionate evidence.
- 2.3 The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy 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 is a lower level planning document that is in conformity with the Joint Core Strategy and national planning requirements.
- 2.4 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

- 2.5 Initial SA work (published 2012)<sup>12</sup> 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 (updated & published 2013). 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 undertaken so far. 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 updating and

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<sup>12</sup> <https://www.gloucester.gov.uk/about-the-council/strategies-plans-policies/city-plan/>



analysis are presented in Appendix II and discussed in section 3 of this SA Report.

- 2.6 The existing framework of SA Objectives was 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 of this SA Report. This revised SA framework of objectives 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 the timescale for implementation (in the period up to 2031). The SA framework forms the basis against which emerging elements of the GCP are appraised using both quantitative and qualitative assessment 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*).
- 2.7 The categories of significance used with the SA Framework are the same as that used for the SA of the JCS and as set out in the key below.

**Table 2.2: SA Significance Key**

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

**Table 2.1: SA Framework**

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.</li> </ul>	<p>1. Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest</p> <p>Relevant JCS SA Objective: 1</p>	<p>The nature and significance of effects against SA Objective 1 primarily relate to the potential effects on <b>designated biodiversity</b>.</p> <p>Is the site within, adjacent to, or in close proximity (200m) to any nationally designated biodiversity (SSSIs)?</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 biodiversity sites designated as being of local importance (Local Wildlife Site, Local Nature Reserve, Geological Site)?</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>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 designated biodiversity that may be some distance away.</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 OR 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>Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.</p>

Key Issues	SA Objective(s)	Significance Criteria:					
		<p>The findings of the HRA will also inform the appraisal of site options.</p> <p><b>Evidence / Data Source:</b> DEFRA Magic Map and GIS map layers of local biodiversity designations supplied by Gloucester City Council</p>	<table border="1"> <tr> <td data-bbox="1608 233 1720 320" style="background-color: yellow;">-</td> <td data-bbox="1720 233 2168 724">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.</td> </tr> <tr> <td data-bbox="1608 724 1720 812" style="background-color: orange;">--</td> <td data-bbox="1720 724 2168 922">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.</td> </tr> </table>	-	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.	--	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.
-	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.						
--	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.						
<ul style="list-style-type: none"> <li>There is a need to ensure carbon emissions are minimised</li> </ul>	<p>2. Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources</p> <p>Relevant JCS SA Objective: 2, 6</p>	<p>It is assumed that any potential site option could meet energy efficiency standards, using sustainable construction methods. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 2, and this SA Objective will not be a key differentiator between site options.</p>					
	<p>3. Improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change.</p> <p>Relevant JCS SA Objective: 3</p>	<p>It is assumed that any potential site option could meet sustainable design and construction standards. Biodiversity and green infrastructure networks are considered against SA Objectives 1 and 19-20. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 3, and this SA Objective will not be a key differentiator between site options.</p>					

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ There is a requirement to maintain and improve the ecological status of the River Basin.</li> </ul>	<p>4. Reduce water use and conserve and improve the quality of water bodies in the Plan area</p> <p>Relevant JCS SA Objective: 5, 6</p>	<p>It is assumed that development at any of the site options can contribute to minimising the demand for and use of water.</p> <p>The nature and significance of the effects against SA Objective 4 will therefore primarily relate to the location of the site option in relation to the <b>Surface Water Safeguard Zone and the potential effects of development on water quality.</b></p> <p>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.</p> <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</p>	++	A major positive effect is not considered possible.
			+	The site option is not located within a Surface Water Safeguard Zone and will not lead to any negative effects on water quality.
			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 expensive / difficult, potential for a residual major negative effect.

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ A large proportion of the City falls within the River Severn floodplain</li> </ul>		<p>judgements made in terms of the nature and significance of the effects against this SA Objective.</p> <p><b>Evidence / Data Source:</b> Environment Agency Drinking Water Safeguard Zones map</p>		
	5. Protect floodplain from development likely to exacerbate flooding problems from all sources	<p>The nature and significance of the effects against SA Objective 5 will primarily relate to the location of development in relation to a <b> flood risk area </b> (flooding from all sources).</p> <p>The SA assumes that development at any of the site options has the potential to incorporate Sustainable Drainage systems.</p> <p><b>Evidence / Data Source:</b> Environment Agency Flood Map (Flooding from rivers, the sea, and surface water) supported by GIS map layer from Gloucester City Council</p>	++	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.
	Relevant JCS SA Objective: 4		+	The site option is not located within an area of flood risk and is not at risk of surface water flooding.
			0	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.
			?	There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out.
			-	The site option is located partially within an area of flood

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ There is a need to encourage a move away from the dependence on the private motor car</li> <li>■ High levels of in-commuting</li> <li>■ Certain areas suffer from traffic congestion and poor air quality</li> </ul>				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.
	6. Reduce the need to travel and maximise the use of sustainable modes of transport  Relevant JCS SA Objective: 8	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.  <b>6a)</b> The nature and significance of the effects against SA Objective 6a will primarily relate to <b>site access and impacts on the highways network</b> .  Given existing site assessment work undertaken as part of 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	++	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.		
	?	There is an element of uncertainty, most likely until lower level assessments have been carried out.		
	-	Development has the potential to increase traffic in the		

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>access may be a significant issue then this will be noted within the summary appraisal narrative.</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><b>Evidence / Data Sources:</b> Officer input, traffic modelling (when available)</p>		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.
			--	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><b>6b)</b> The nature and significance of the effects against SA Objective 6b will primarily relate to the <b>distance of the site from existing sustainable transport modes</b> (train, bus, pedestrian and cycling routes).</p> <p>The SA assesses access to four different modal choices;</p>	++	The site option is within reasonable walking distance (800m) to all four of the assessed modal choices.
			+	The site option is within reasonable walking distance (800m) to at least a mode of public transport (train or bus) and a free mode of transport (cycle path or PRoW)
			0	A neutral effect is not considered possible.

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>train, bus, cycle routes and Public Rights of Way.</p> <p>A reasonable walking distance of 800m has been utilised in the assessment <sup>13</sup>.</p> <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> <p>The SA assumes that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport.</p> <p><b>Evidence / Data Source:</b> GIS map layers supplied by Gloucester City Council</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.
			-	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).
			--	The site is beyond reasonable walking distance (800m) to all four of the assessed modal choices.

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<sup>13</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance



Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>Previously developed land may be subject to contamination</li> </ul>	7. Improve soil quality  Relevant JCS SA Objective: 5	<p>The nature and significance of the effects against SA Objective 7 will primarily relate to whether development at the site could <b>regenerate previously developed land or would result in the loss of greenfield land or best and most versatile agricultural land.</b></p> <p>It is considered that there is an element of uncertainty for all site options until more detailed lower level surveys and assessments have been carried out through planning applications.</p> <p>The appraisal will also note if the site option is located within a mineral safeguarded area with the potential to unnecessarily sterilise mineral resources.</p> <p><b>Evidence / Data Source:</b> Defra Magic Map Application and Google Maps</p>	<div style="background-color: #008000; color: white; text-align: center; padding: 5px;">++</div>	The site is entirely brownfield and will not result in the loss of any greenfield or agricultural land.
	<div style="background-color: #90EE90; color: white; text-align: center; padding: 5px;">+</div> <div style="background-color: #0000FF; color: white; text-align: center; padding: 5px;">0</div> <div style="background-color: #FFFFFF; color: black; text-align: center; padding: 5px;">?</div> <div style="background-color: #FFFF00; color: black; text-align: center; padding: 5px;">-</div> <div style="background-color: #FFA500; color: black; text-align: center; padding: 5px;">--</div>	<p>The majority of the site is brownfield land and will not result in the loss of best and most versatile agricultural land.</p> <p>A neutral effect is not considered possible.</p> <p>An element of uncertainty exists until more detailed lower level surveys and assessment have been carried out.</p> <p>The majority of the site is greenfield and does not contain any best and most versatile agricultural land.</p> <p>Development at the site option could result in the loss of best and most versatile agricultural land.</p>		
	8. Protect and enhance landscape character	The nature and significance of the effects against SA	<div style="background-color: #008000; color: white; text-align: center; padding: 5px;">++</div>	Development significantly enhances the

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings</li> </ul>	Relevant JCS SA Objective: 5	Objective 8 will relate to <b>townscape / landscape sensitivity</b> and the potential effects of development on townscape / landscape character.	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.	
		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 suggest that this is not the case.	-	The site option has medium to high sensitivity in townscape/landscape terms.
			--	The site option has high sensitivity in
			?	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"> <li>■ <i>Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.</i></li> </ul>		<p>In the absence of key townscape sensitivity evidence, the nature and significance of the effects against this SA Objective will primarily relate to whether the site is greenfield land or brownfield land, and whether development would regenerate existing structures that detract from the townscape.</p> <p><b>Evidence / Data Source:</b> Officer input, Townscape Sensitivity Study (when available)</p>		<p>townscape/landscape terms and / or is located within the setting of the AONB. Mitigation is likely to be difficult/expensive. Potential for a residual major negative effect.</p>
	<p>9. Protect and enhance the distinctive townscape quality and historic heritage and its setting.</p> <p>Relevant JCS SA Objective: 5, 7</p>	<p>The nature and significance of the effects against SA Objective 9 will primarily relate to <b>designated heritage assets</b> (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Areas of Archaeological Potential &amp; Importance) and their setting. Any important non-designated heritage assets will be noted within the appraisal commentary.</p> <p>Are there any designated heritage assets or their</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>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>
			0	<p>Development at the site option will have no significant effect. This may be because there are no heritage assets within the</p>

Key Issues	SA Objective(s)	Significance Criteria:	
		<p>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 of effects against this SA Objective.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed</p>	<p>influence of proposed development, or that mitigation measures are considered to reduce negative effects with the potential for a residual neutral effect.</p>
			<p style="text-align: center;"><b>?</b></p> <p>Element of uncertainty until more detailed lower level surveys and assessments have been carried out.</p>
			<p style="text-align: center;"><b>-</b></p> <p>Development has the potential for a residual minor negative effect on designated heritage asset(s) and/ or their setting.</p>
			<p style="text-align: center;"><b>--</b></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:		
<ul style="list-style-type: none"> <li>■ There is a national requirement to minimise waste production and waste sent to landfill.</li> <li>■ <i>Previously developed land may be subject to contamination</i></li> <li>■ <i>Certain areas of the City suffer from traffic congestion and poor air quality.</i></li> </ul>		<p>lower level surveys and assessments have been carried out.</p> <p><b>Evidence / Data Source:</b> National Heritage List for England, DEFRA Magic Map, and GIS map layers supplied by Gloucester City Council.</p>		
	<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>		
	<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>A major positive effect is not considered possible.</p>
		<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</p>	+	<p>Development at the site could address an existing amenity issue for neighbouring land uses.</p>
		0	<p>Development at the site is not likely to be affected by any 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>	

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>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>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>The nature and significance of the effects against SA Objective 11 will therefore primarily relate to any potential <b>conflicting neighbouring land uses.</b> <b>Evidence / Data Source:</b> Google Maps &amp; Officer input</p>	?	An element of uncertainty exists until more detailed site level assessments have been undertaken.
			-	Development at the site could potentially be affected by neighbouring land uses and/or could affect the amenity of a sensitive neighbouring land use.
			--	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.
			++	Potential for the site option to accommodate a strategic level of employment development (equal to or more than 1ha).
	12. Ensure the availability of employment land and premises to secure future prosperity potential	The nature and significance of the effects against both SA Objective 12 and 13 will primarily relate to the	++	Potential for the site option to accommodate a strategic level of employment development (equal to or more than 1ha).

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ Need to plan for and protect quality employment land and ensure a future supply</li> <li>■ There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry</li> <li>■ There are older, less attractive employment areas</li> </ul>	Relevant JCS SA Objective: 10	<b>capacity of the site to accommodate new employment development</b>  <b>Evidence / Data Source:</b> Officer input	+	Potential for the site option to accommodate employment development (less than 1ha).
	0		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.	
	?		There is an element of uncertainty as the capacity of the site option for employment development is unknown.	
	-		Development at the site option may result in a net loss of existing employment.	
	--		Not applicable.	
<ul style="list-style-type: none"> <li>■ Poor retail provision compared to the size of Gloucester's shopper population</li> <li>■ Limited early hours / evening economy</li> <li>■ Lack of overnight tourist visitors</li> </ul>	13. Support the economy by helping new and existing businesses to fulfil their potential Relevant JCS SA Objective: 10	The SA assumes that any proposal for development can make appropriate and timely provision or contributions for necessary supporting infrastructure, including community facilities and services. The nature and significance of the effects against SA Objective 14 will primarily relate to the <b>distance of the</b>	++	The site option is located within reasonable walking distance (800m) of all / the majority of key services and facilities located within the City centre
	Relevant JCS SA Objective: 11		+	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.	

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ There are areas of the City that experience high unemployment rates</li> <li>■ High levels of in-commuting</li> <li>■ There are opportunities to connect new employment development with key transport infrastructure projects (e.g. the M5 and Blackfriars to support the growth zone identified in the Strategic Economic Plan, and alongside the new bus station)</li> </ul>		<b>site from existing services and facilities</b>		
		Services and facilities that will be assessed as crucial to meet local needs include supermarket, convenience store, post office, community centre and bank	?	There is an element of uncertainty until lower level assessments have been carried out
		Health facilities (GP, Dentist, Pharmacy, and medical centres) are assessed against SA Objective 17	-	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
		Educational facilities (nursery, child-care, primary and secondary schools, and further education establishments) are assessed against SA Objective 24  A reasonable walking distance of 800m has been utilised in the assessment <sup>14</sup> . <b>Evidence / Data Source:</b> GIS map layers supplied by Gloucester City Council	--	The site is located beyond reasonable walking distance (800m) to all services and facilities assessed against this SA Objective.

<sup>14</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance



Key Issues	SA Objective(s)	Significance Criteria:											
	15. Integrate sustainable construction principles and standards into all development schemes  Relevant JCS SA Objective: 2, 3	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.											
<ul style="list-style-type: none"> <li>■ <i>There is a need to ensure carbon emissions are minimised</i></li>   <li>■ There are inequalities in opportunity across the Plan area</li> <li>■ 'Pockets' of acute deprivation exist in some parts of the City</li> </ul>	16. Reduce inequalities in wellbeing and opportunity  Relevant JCS SA Objective: 12	The nature and significance of the effects against SA Objective 16 will primarily relate to the <b>provision of development in Gloucester LSOAs in the 10-30% most deprived areas in England<sup>15</sup></b> .  <b>Evidence / Data Source:</b> DCLG Indices of Deprivation	<table border="1"> <tr> <td data-bbox="1603 533 1720 671" style="background-color: #008000; color: white; text-align: center;">++</td> <td data-bbox="1720 533 2168 671">The site will deliver new housing or employment land within the most deprived 10-30% LSOAs in England.</td> </tr> <tr> <td data-bbox="1603 671 1720 839" style="background-color: #90EE90; text-align: center;">+</td> <td data-bbox="1720 671 2168 839">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.</td> </tr> <tr> <td data-bbox="1603 839 1720 970" style="background-color: #0000FF; color: white; text-align: center;">0</td> <td data-bbox="1720 839 2168 970">A neutral effect is not considered possible.</td> </tr> <tr> <td data-bbox="1603 970 1720 1101" style="text-align: center;">?</td> <td data-bbox="1720 970 2168 1101">An element of uncertainty exists until lower level assessments have been carried out</td> </tr> <tr> <td data-bbox="1603 1101 1720 1233" style="background-color: #FFFF00; text-align: center;">-</td> <td data-bbox="1720 1101 2168 1233">A minor negative effect is not considered possible</td> </tr> </table>	++	The site will deliver new housing or employment land within the most deprived 10-30% LSOAs in England.	+	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.	0	A neutral effect is not considered possible.	?	An element of uncertainty exists until lower level assessments have been carried out	-	A minor negative effect is not considered possible
++	The site will deliver new housing or employment land within the most deprived 10-30% LSOAs in England.												
+	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.												
0	A neutral effect is not considered possible.												
?	An element of uncertainty exists until lower level assessments have been carried out												
-	A minor negative effect is not considered possible												

<sup>15</sup> DCLG Indices of Deprivation - Lower Super Output Areas (LSOAs) in the most deprived 10 to 30% in England 2015; [Westgate; 004B, 004E, 004F. Podsmead; 009E. Matson and Robinswood; 008C, 011A, 011B, 011D, 011E. Kingsholm and Wotton; 002C. Moreland; 004A, 008D, 008E. Barton and Tredworth; 005A, 005B, 005C, 005D, 005E, 008A, 008B. Tuffley; 012D. Barnwood; 007D, 007E, 007F.]

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>High levels of obesity in both adults and children</li> </ul>			--	A major negative effect is not considered possible
	17. Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities  Relevant JCS SA Objective: 14	The nature and significance of the effects against SA Objective 17 will primarily relate to the <b>distance of the site from existing health facilities and promoted walking routes</b> <sup>16</sup> .  A reasonable walking distance of 800m has been utilised in the assessment <sup>17</sup> .  <b>Evidence / Data Source:</b> GIS map layer supplied by Gloucester City Council	++	The site option is located within a reasonable walking distance (800m) of both existing health facilities and promoted routes OR Evidence suggests that development at the site option has the potential to deliver new health facilities
			+	The site option is located within reasonable walking distance (within 800m) of existing health facilities
			0	A neutral effect is not considered possible.
			?	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

<sup>16</sup> Promoted walking routes are identified by Gloucestershire County Council as long distance PRowS that are known to be safe, good quality routes promoting ease of movement

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

Key Issues	SA Objective(s)	Significance Criteria:													
<ul style="list-style-type: none"> <li>■ Homelessness</li> <li>■ There is acute housing 'need' in the City</li> <li>■ There is a significant growth in the population predicted, particularly in the young and working age bands</li> <li>■ Growth in the number of households, in particular single person households, and a need to balance the housing stock to accommodate this</li> </ul>			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; text-align: center; background-color: #FFD700;">--</td> <td>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>	--	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.										
	--	The site option is located beyond reasonable walking distance (800m) to both existing health facilities and promoted routes OR Development at the site option could result in the loss of existing medical facilities.													
	<p>18. Ensure the availability of housing land and premises including affordable housing to meet local need</p> <p>Relevant JCS SA Objective: 15</p>	<p>The nature and significance of the effects against SA Objective 18 will primarily relate to the <b>capacity of the site option to accommodate new housing.</b></p> <p>The SA assumes that development at any of the site options could be delivered to a high quality and could provide an appropriate mix of housing types and tenures.</p> <p><b>Evidence / Data Source:</b> Officer input</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; text-align: center; background-color: #008000;">++</td> <td>The site option has the potential to provide a significant amount of new housing (100 dwellings or more)</td> </tr> <tr> <td style="width: 15%; text-align: center; background-color: #90EE90;">+</td> <td>The site option has the potential to provide new housing (less than 100 dwellings)</td> </tr> <tr> <td style="width: 15%; text-align: center; background-color: #0000FF; color: white;">0</td> <td>If no housing is being proposed as part of development, as it is an employment site option, then it is considered to have a neutral effect against this SA Objective.</td> </tr> <tr> <td style="width: 15%; text-align: center; background-color: #FFFFFF; color: black;">?</td> <td>There is an element of uncertainty as the capacity of the site option for housing development is unknown at this stage.</td> </tr> <tr> <td style="width: 15%; text-align: center; background-color: #FFFF00;">-</td> <td>Not applicable.</td> </tr> <tr> <td style="width: 15%; text-align: center; background-color: #FFD700;">--</td> <td>Not applicable.</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.	-	Not applicable.	--	Not applicable.
	++	The site option has the potential to provide a significant amount of new housing (100 dwellings or more)													
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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.													
	-	Not applicable.													
	--	Not applicable.													
	<p>19. Minimise development on open space and green spaces</p>	<p>The nature and significance of the effects against both SA Objective 19 and 20 primarily</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; text-align: center; background-color: #008000;">++</td> <td>Development at the site option has the potential to result in a net gain in open / green space</td> </tr> </table>	++	Development at the site option has the potential to result in a net gain in open / green space										
++	Development at the site option has the potential to result in a net gain in open / green space														

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>The City needs to protect areas of public open space and green corridors/networks and provide a comprehensive, connected and accessible network of spaces.</li> </ul>	Relevant JCS SA Objective: 16	<p>relate to the <b>accessibility of open space and green space</b> in relation to the site option, as well as the potential for development to result in a <b>net loss / net gain</b> in open or green spaces.</p> <p>A reasonable walking distance of 800m has been utilised in the assessment <sup>18</sup>.</p> <p><b>Evidence / Data Source:</b> GIS map layer supplied by Gloucester City Council.</p>		
	20. Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations		+	The site option is located within reasonable walking distance (800m) of existing open / green space
	Relevant JCS SA Objective: 16		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	Relevant JCS SA Objective: 13	It is assumed that development at any of the site options could incorporate secured by design standards <sup>19</sup> . It is therefore assumed that all 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.		

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

<sup>19</sup> Secured by Design Homes 2016; Official Police Security Initiative

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> <li>■ Crime and fear of crime.</li> <li>■ Localism driving increased local level participation.</li> <li>■ Educational achievement needs improving</li> </ul>	<p>24. Support the development of accessible education, skills and learning, to meet the needs of both employers and the working population</p> <p>Relevant JCS SA Objective: 17</p>	<p>The nature and significance of the effects against SA Objective 24 will primarily relate to the <b>distance of the site from existing educational facilities.</b></p> <p>A reasonable walking distance of 800m has been utilised in the assessment <sup>20</sup>.</p> <p><b>Evidence / Data Source:</b> GIS map layer supplied by Gloucester City Council</p>	++	Evidence suggests that development at the site option has the potential to deliver new educational facilities
				The site option is located within a reasonable walking distance (within 800m) of educational facilities
			+	
				A neutral effect is not considered possible.
			0	
				There is an element of uncertainty until lower level assessments have been carried out.
			-	
				Development at the site option could result in the loss of existing educational facilities.
<ul style="list-style-type: none"> <li>■ Adequate protection of cultural heritage.</li> </ul>	<p>25. Protect and enhance the cultural heritage and offering of individual settlements</p> <p>Relevant JCS SA Objective: 18</p>	<p>It is considered that there is insufficient evidence available at this stage to make a reasonable judgement on the potential effects of development and the Draft GCP on cultural heritage.</p>		

<sup>20</sup> Department for Transport (2007) Manual for Streets - identifies that a walkable neighbourhood is characterised by having a range of facilities within 10 minutes (up to 800m) walking distance

## Appraising the Draft Gloucester City Plan (GCP)

- 2.7 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/Key Principles with the SA Objectives was undertaken and the findings reported here in summary in section 5 with the details provided in Appendix III.
- 2.8 Each emerging element of the GCP was appraised against the full SA Framework of objectives and decision-aiding questions using professional judgment and available evidence. Where possible and appropriate, specified qualitative and quantitative thresholds were used to define the five categories of significance of effects (major/minor negative; neutral; major/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; secondary, cumulative and synergistic, were described in accordance with Schedule 2 of the SEA Regulations
- 2.9 Each potential site option/proposed allocation was appraised against the full SA Framework of Objectives using professional judgment and the baseline evidence. Where possible and appropriate, specified qualitative and quantitative thresholds were used to define five 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.
- 2.10 An appraisal commentary was provided on how the site option would progress SA Objectives, and where appropriate, recommendations for enhancement and mitigation were provided. Detailed SA matrices for site options/proposed allocations are provided in Appendix IV of this SA Report and summary findings are set out in sections 4, 5 & 6. Where uncertainty or gaps in information were apparent, this was recorded.
- 2.11 The SA of the Draft GCP, including policies, is structured under topic headings that are 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 Policies, proposed Site Allocations, and the overall likely effects of implementing the plan as a whole, were appraised by sustainability topics as follows:
- Housing
  - Economy and Employment
  - Health & Equality
  - Transport & Accessibility
  - Air Quality

- Climate Change
- Water Resources, Water Quality, and Flood Risk
- Landscape & the Historic Environment
- Biodiversity
- Soils

2.12 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 good practice mitigation and adaptation is the most appropriate approach.

### **Consultation**

2.13 The SEA Directive and Regulations require early and effective public consultation. This SA has been undertaken with best practice, including early and wide consultation with stakeholders and the public. The SA has been subject to public consultation at the SA scoping stages for the GCP in 2012, the JCS in 2013 and further reported for the GCP in 2016. The Initial SA Report accompanied the Draft GCP Policies and Proposed Site Allocations on Regulation 18 consultation in early 2017. Comments made on the SA have been taken into account in the preparation of this SA Report and are summarised with responses in Appendix VI. Any comments received on this SA Report will be submitted with the Draft GCP and other evidence for independent examination.

### 3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

#### Introduction

- 3.1 Initially the SA built upon previous scoping work to identify the key issues and opportunities for the Gloucester Plan area and including the JCS Scoping Report (2008, updated in 2012). Baseline information and plan/programme (PP) reviews were updated in 2011 and 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 the baseline information and PP review were further updated to take account of more recent evidence and any new issues or opportunities arising. This section presents the updated PP review with a summary of the implications for the GCP, and updated baseline information including the likely evolution without the Plan. Key issues and opportunities were also updated in line with this evidence and discussed in the following paragraphs; this informed the refinement of the SA frameworks that form the basis for assessment.

#### 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 PP Review was undertaken during the scoping stage (2008) of the SA of the higher level GCT JCS. This was updated in 2011 (JCS Preferred Options stage), and subsequently 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, including the GCP. This information builds upon an initial SA Scoping Report undertaken in 2005 by Gloucester City Council to support its previous development plan.
- 3.5 It was not considered necessary to duplicate the work already done, and as such the updated PP draws upon the JCS work for key regional to national plans and focuses on local information relevant to Gloucester City. International plans/programmes have been transposed into national plans, policy and legislation.



### **National:**

- DCLG, National Planning Policy Framework (NPPF), 2012, updated 2018 - the NPPF is the overarching planning framework which provides national planning policy and principles for the planning system in England.
- Defra, 2018 A green Future: Our 25 Year Plan to Improve the Environment – includes proposed actions for using land sustainably, recovering nature & enhancing landscapes, improving health & wellbeing, increasing resource efficiency, reducing pollution & waste, securing healthy and biologically diverse seas & oceans.
- 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; Defra Abstraction Reform Report 2019.
- The Heritage Alliance, Heritage 2020 - the historic environment sector's plan for its priorities between 2015 and 2020.
- Historic England, Corporate Plan 2018-2021 - the Plan is the delivery document.
- 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, Strategy to 2020 – identifies health strategic priorities over the 4-year period and delivery mechanisms to achieve them.
- 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.
- DBEI, 2050 Pathways 2013 - sets out how the UK will implement the Energy Efficiency Directive and help to achieve the EU 20% energy saving target for 2020.
- DBEI 2018 Leading the way to a low carbon future
- DBEI 2019 the UK's Draft Integrated National energy & Climate Change Plan (NECP)
- Defra, Clean Air Strategy 2019 – to reduce air pollution from industry, agriculture and transport emissions.

### **Regional:**

- Severn Trent, Water Resources Management Plan – every 5 years identifies the water supply, forecasts water demand and supply over a 25-year period.

- 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.
- River Severn basin District: Flood Risk Management Plan 2015-2021 - 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, adopted December 2017 - 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 2018 - outlines plans to drive growth with the Growth Hub, GREEN a centre of excellence in renewable energy, engineering and nuclear skills, and Farm491 for agri-tech.
- Gloucester City Council, Economic Growth Strategy, 2018 - 2021 - sets out the ambitions for Gloucester, and key future regeneration projects including Kings Quarter, Bakers Quay, and Blackfriars.
- GFirst LEP Gloucestershire Energy Strategy 2019 for progressing low carbon economy.
- 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. Reviews published in 2014 & 2018.
- 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 2018-2032 - sets the framework for the future supply of minerals in Gloucestershire.
- Gloucestershire Local Transport Plan 2015-2031
- 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'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.

- GCT JCS 2014 Green Infrastructure Strategy

### **Neighbourhood Plans**

- Hempsted Neighbourhood Plan Area designated within the City

### **Implications for the GCP and SA**

- 3.7 Development growth is likely to increase traffic on the roads with 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 potential negative 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 to ensure the capacity of services and facilities.
- 3.9 The GCP can support water efficiency and phasing of development to minimise effects on water resources, as well as ensure that water quality is maintained 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.
- 3.10 The GCP presents opportunities to support other existing plans and strategies, such as 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 encourage new development to support healthy and active lifestyles.
- 3.12 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 with positive effects are maximised.

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

- 3.13 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 a plan. To make judgements about how the emerging content of the GCP will progress or hinder sustainable development, it is important to understand the current economic, environmental and social circumstances in the Plan area and their likely evolution in the future. It is only necessary to collect relevant and sufficient data on the state of the Plan area to allow the potential effects of the GCP to be adequately predicted.

- 3.14 Government guidance<sup>21</sup> advises 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. The baseline information provided below is structured around SEA themes; it draws upon the baseline information in the SA of the GCT JCS (Oct 2013 - Appendix IV) and builds upon the initial GCP SA Scoping Report prepared by Gloucester City Council (2005).

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

#### **Communities**

- 3.15 In 2014 the population of Gloucester was estimated to be 125,600<sup>22</sup>, demonstrating a continuing increasing trend since 2001<sup>23</sup>. Gloucester will experience the greatest population growth of all the county districts, expected to increase by 20.1% or 23,800 people between 2010 and 2035<sup>24</sup>. Gloucester is a relatively young city with 25% of the population aged 19 and under (highest in the South West) and 39% under 30. The city is expected to experience the greatest increase of Gloucestershire's districts in the number of children and young people between 2010 and 2035, with an increase of 16.4%<sup>25</sup>.
- 3.16 In 2011<sup>26</sup>, the majority of people in the Plan area lived in two people households, followed closely by single occupancy households. The housing stock in Gloucester was identified as 53,413 dwellings; 85.5% of which were private housing; 8.6% were local authority housing; and 5.9% were registered social landlord housing. The average rent charged for all registered social landlord dwellings was also higher than the South West and England average. 109 households between 2010 and 2011 were identified as Statutory Homeless. Although ward boundaries have been amended since the data was produced, evidence<sup>27</sup> suggests that the wards of Abbey, Elmbridge, Grange, Hucclecote and Longlevens contain high level of home ownership (over 80% of total households), compared to Kingsholm and Wotton, Podsmead and Westgate which contain the lowest levels of home ownership (below 50% of households). The highest levels of social renting were identified in the wards of Matson and Robinswood, and Podsmead, and the highest

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<sup>21</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>22</sup> NOMIS official labour market statistics

<sup>23</sup> ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

<sup>24</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>25</sup> Ibid

<sup>26</sup> ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

<sup>27</sup> ONS – 2011 Census

levels of private renting were identified in the wards of Westgate, Kingsholm and Wotton, and Barton and Tredworth.

- 3.17 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.
- 3.18 ONS reported 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).
- 3.19 The Centre for Cities Outlook 2014<sup>28</sup> identifies that Gloucester is ranked 2<sup>nd</sup> out of 63 cities for the highest housing stock growth. Among the top-placed cities, only five (Swindon, Milton Keynes, Gloucester, London and Peterborough) have experienced housing supply growth in accordance to their population growth rates.
- 3.20 The SHMA<sup>29</sup> identifies that the size of the private rented sector increased by over 70% in the County between 2001 and 2011. This substantial growth matches regional and national trends. Much of the growth of the private 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).
- 3.21 Gypsy and Traveller policy is provided at the JCS level. 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, Twynning (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.

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<sup>28</sup> Centreforcities (2014) Cities Outlook 2014

<sup>29</sup> HDH Planning and Development Ltd (2014) Local Authorities of Gloucestershire Strategic Housing Market Assessment Update

- 3.22 The Cultural Strategy<sup>30</sup> identifies that Gloucester is developing its cultural capital through redevelopment and regeneration programmes. It 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 further noted 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.
- 3.23 ONS crime statistics<sup>31</sup> report that the most frequent type of crime committed in Gloucester during 2012 and 2013 was criminal damage and arson, followed by vehicle offences. Gloucester City Council have produced a design guide<sup>32</sup> with seven main principles to deliver safety in design in new development.
- 3.24 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 sustainability issues, and which could include requirements for new development in and around those areas.

### **Economy and Employment**

- 3.25 In 2015<sup>33</sup>, 84.4% of people in Gloucester were economically active, and there were a higher percentage of males that were economically active than females. 5.1% of people in the Plan area were unemployed. 15.6% of people were economically inactive of which 36.2% wanted a job, and 63.8% did not want a job. Of those in employment, the majority (38.1%) were in professional occupations (including managers, directors, senior officials, associate professional and technical), followed by administrative, secretarial and skilled trade occupations. Evidence<sup>34</sup> suggests that in 2011 Gloucester had a working population of 64,134 people, of which 22,300 came from outside of Gloucester but from within the region, and 3,799 came from outside of the region to access employment in Gloucester.
- 3.26 Over half of the people of Gloucester (aged 16-64) are educated to NVQ3 level and above, but 8.1% have no qualifications<sup>35</sup>. The city boasts high performing schools and over 17,000 college and university students, and is

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<sup>30</sup> Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

<sup>31</sup> ONS, Neighbourhood Statistics: Gloucester Local Authority Crime and Safety

<sup>32</sup> Gloucester City Council - Designing Safer Places

<sup>33</sup> NOMIS official labour market statistics

<sup>34</sup> Ibid.

<sup>35</sup> Ibid.

home to higher education campuses for the University of Gloucestershire, the University of the West of England and Gloucestershire College<sup>36</sup>.

- 3.27 The median weekly pay for all full-time workers living in the area is £477.10, which is lower than both the average for the South West and for Great Britain<sup>37</sup>. However, in line with national trends, male full-time workers on average earn more than female full-time workers, and male full-time workers in Gloucester earn higher than the average weekly wage for the South West (although still below the average for Great Britain). Female full-time workers living in the area however earn significantly less than the South West and Great Britain average (£382.40 per week, compared to £440.10 in the South West and £471.60 in Great Britain). In April 2016, 1,450 people (aged 16-64) in Gloucester were claiming out-of-work benefits, the majority of which were aged 25 to 49.
- 3.28 In 2015, a total of 3425 business enterprises were identified, located across 4520 local units. In line with regional trends, the majority of businesses in Gloucester are micro organisations (85.4%) consisting of 0 to 9 employees. 20 (0.6%) large organisations (employing over 250 people) were identified over 25 units. The Gloucestershire Strategic Economic Plan<sup>38</sup> identifies Gloucester as an urban cluster containing the key urban settlements and main business, commercial, educational, service and cultural centres for the county. Gloucester is home to advanced engineering companies (e.g. Prima Dental) and supports a strong finance and insurance cluster as well as a growing number of information security, web hosting, CAD/CAM development, defence communications and security, ICT infrastructure development and IT content management businesses. The creative community has grown rapidly in recent years, with the Blackfriars and Westgate Street areas having established themselves as a hub for creative businesses<sup>39</sup>.
- 3.29 The Centre for Cities Outlook 2014 reports that Gloucester is ranked 2<sup>nd</sup> out of 64 cities for having the highest employment rate, and that Gloucester is in the top-ten cities where small businesses are investing in high growth strategies<sup>40</sup>. Gloucester further attracts 5.9 million visitor trips each year and annually, visitor spend is £207 million<sup>41</sup>.
- 3.30 Regeneration underpins much of the significant recent development that has occurred in Gloucester and regeneration to date has been largely heritage-led (supporting sense of place and local character), with the restoration of, and new uses for, many historic buildings, including; Docks Warehouses, St Michael's Tower, Buildings at the Quays, Robert Raikes' House and 66 Westgate Street<sup>42</sup>. Phase 1 of the redevelopment scheme for King's Quarter is underway, which includes the development of a new modern bus station, linked with the adjacent train station. More significant projects that have recently been successfully delivered include:

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<sup>36</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

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

<sup>38</sup> GFirst LEP (2014) Strategic Economic Plan for Gloucestershire

<sup>39</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>40</sup> Centreforcities (2014) Cities Outlook 2014

<sup>41</sup> Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

<sup>42</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

- St Oswalds Park
- Gloucester Docks and Quays
- Railway Triangle / Corridor
- Blackfriars Priory
- Greyfriars

- 3.32 The City has a strong independent retail and leisure sector with over 100 independent city centre shops<sup>43</sup>. The Retail Study<sup>44</sup> identifies that existing commitments are capable of accommodating some £80 million of convenience spending in 2031 and this more than off-sets the residual requirement. For comparison goods the residual expenditure in Gloucester for which additional floorspace is required, is £114.76 million. Gloucester City Council consider that evidence needs updating and it is noted that the JCS authorities will be preparing an immediate review of the JCS retail policy directly after it has been adopted. This will, amongst other things, set out a number of site allocations as part of the comprehensive city / town centre and retail strategy.
- 3.33 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 address existing issues, such as out-commuting for employment and retail needs.

### **Health and Equalities**

- 3.34 The health of people in Gloucester is varied compared with the England average. Deprivation is higher than average and about 19.3% (4800) children live in poverty. Life expectancy for men is lower than the England average. Life expectancy is 13.5 years lower for men and 10.6 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. It is evident therefore that inequalities exist in the Plan area. Evidence<sup>45</sup> further identifies that this is an increase from 2014, where life expectancy was 11.7 years lower for men and 9.2 years lower for women in the most deprived areas of Gloucester than in the least deprived areas.
- 3.35 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.

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<sup>43</sup> Ibid.

<sup>44</sup> Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Retail Study 2011-2031 Phase 1 update

<sup>45</sup> Gloucester City Council (2016) Topic Paper; Health and Wellbeing



- 3.36 Public Health is managed at the county level, and the Gloucestershire Health and Wellbeing Strategy<sup>46</sup> identifies that key areas for improvement in health in the Gloucestershire County include:
- Reducing obesity
  - Reducing the harm caused by alcohol
  - Improving mental health
  - Improving health and wellbeing into older age
  - Tackling health inequalities
- 3.37 Gloucester is a diverse city, the black and minority ethnic population stands at 9.8% with approximately 100 languages and dialects spoken<sup>47</sup>.
- 3.38 There are 45 formal children's play areas in the city and over £1 million was invested in upgrading these between 2009 and 2013<sup>48</sup>. The city is home to various sporting facilities and activities including Gloucester Rugby, Oxstalls Sports Park, and Gloucester Rowing Club. Gloucester was one of the city's that hosted the 2015 Rugby World Cup. Investment in sporting facilities and activities is ongoing; the rowing club has secured £1.5 million funding for a new canalside boathouse, major refurbishment of the Blackbridge Jubilee Athletics Track has also created an all-weather floodlit synthetic track, and further outline planning consent have been given for new sporting facilities at the University of Gloucestershire<sup>49</sup>. The Open Space Strategy<sup>50</sup> however identifies that access to formal sports and play provision is also not equally distributed across the city. The Playing Pitch Strategy<sup>51</sup> further identifies shortfalls in provisions of football and rugby pitches and asserts that demand for cricket and hockey pitches is likely to increase (particularly due to potential hockey pitch loss).
- 3.39 The Gloucester Open Space Audit<sup>52</sup> identified that the amount of public open space in the Plan area increased from 2.19 hectares per 1,000 population in 2001 to 2.35 hectares per 1,000 population in 2008. The Public Open Space Strategy<sup>53</sup> identifies that there are over 150 individual areas of public open space in the city covering 300 hectares, together with allotments, cemeteries, Robinswood Hill Country Park and Alney Island Local Nature Reserve, a total open space area of 521 hectares. This equates to just over 12% of the city's total land area which is publicly 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.

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<sup>46</sup> Gloucestershire Shadow Health and Wellbeing Board, Gloucestershire Health and Wellbeing Strategy 2012 - 2032 Fit for the Future

<sup>47</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>48</sup> Gloucester City Council, Open Space Strategy, 2014 - 2019

<sup>49</sup> Gloucester City Council (2016) Regeneration and Economic Development Strategy

<sup>50</sup> Gloucester City Council, Open Space Strategy, 2014 - 2019

<sup>51</sup> Knight, Kavanagh & Page (2015) Gloucester Playing Pitch Strategy 2015-2025

<sup>52</sup> Gloucester City Council, Quantitative Open Space Audit, 2008

<sup>53</sup> Gloucester City Council Open Space Strategy 2014 - 2019

- 3.40 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.
- 3.41 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 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**

- 3.42 Gloucester as an urban area has a comprehensive transport network that includes major roads, railway, bus/coach services, cycling routes and pedestrian routes. Key transport links through Gloucester include; the M5 motorway linking Birmingham and Bristol; the A417 linking the M5 with the M4; A40 providing east west access; Gloucester railway station linking London, Bristol, Birmingham, Cardiff and Swindon; and a good bus network coverage with a strong commercial network. There is an airport located at Staverton<sup>54</sup> (outside of the GCP area) which provides a limited range of internal flights, as well as flying lessons and flying activities including hot air balloon flights and wing walking.
- 3.43 Despite the travel choices offered however, car usage continues to dominate. Congestion occurs on many of the roads but particularly around Gloucester and Cheltenham<sup>55</sup>. Traffic is a key source of emissions in the area, which indirectly affects air quality. ONS data<sup>56</sup> identifies that in line with regional and national trends the majority of households in Gloucester contain one car or van. The percentage of households with access to 2 cars/vans in Gloucester (roughly 26.9%) is higher than the national average (around 24.7%) but lower than the South West average of 28.3%. The percentage of

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<sup>54</sup> Gloucestershire Airport

<sup>55</sup> Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

<sup>56</sup> ONS, 2011: [neighbourhood.statistics.gov.uk](http://neighbourhood.statistics.gov.uk); Gloucester (Local Authority)

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%.

- 3.44 Transport in Gloucester is planned for at the County level, and the extant Gloucestershire Local Transport Plan<sup>57</sup> identifies current issues and objectives for the Plan area. The main issues facing the County area over the plan period 2011-2026 are:
- 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
  - How much partners in the health services, education and others will be able to contribute in the future
  - How communities will respond to the aspirations in the Localism Bill/Act for them to deliver services in their own areas
- 3.45 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.
- 3.46 Gloucester City has and will continue to benefit from a number of regeneration projects, with transport infrastructure continuing to be key in the successful delivery of schemes. The planned growth the GCT JCS and GCP will inevitably result in more trips within the area, and the Local Transport Plan identifies Gloucester as a strong 'trip attractor', particularly into its major employment centres. The Strategic Economic Plan<sup>58</sup> (SEP) promotes the creation of a growth zone for quality employment land in proximity to the M5 which includes Blackfriars in Gloucester.
- 3.47 There is a network of cycle routes connecting the urban area of Gloucester internally, and providing wider direct access to Bristol, Cheltenham, Tewkesbury, Worcester and Evesham, and further indirect access to Stroud, Cirencester, Swindon and Oxford. This includes National Cycle Routes 41 and 45. The Sustrans map<sup>59</sup> however identifies a lack of connections across the Cotswolds AONB, and the Draft Local Transport Plan<sup>60</sup> also identifies that there is a lack of cycle routes between Cheltenham and Gloucester (existing connections are from the north of the city).

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<sup>57</sup> Gloucestershire County Council, Gloucestershire's Local Transport Plan 2011-26

<sup>58</sup> GFirst LEP (2014) Strategic Economic Plan for Gloucestershire

<sup>59</sup> Sustrans.org.uk; National Cycling Network

<sup>60</sup> Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

- 3.48 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 plan for local 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**

- 3.49 Evidence<sup>61</sup> indicates that Gloucester, as situated on the eastern bank of the tidal River Severn and backed by the Cotswold escarpment, has prevailing 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.
- 3.50 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 designated 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 2018 monitoring review<sup>62</sup> reported that exceedances of the annual mean NO<sub>2</sub> objective of 40µg/m<sup>3</sup> were found at four locations during 2018, and all four locations were within the existing AQMAs.
- 3.51 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 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**

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<sup>61</sup> Bureau Veritas (2014) Gloucester City Council LAQM Progress Report 2014

<sup>62</sup> <https://www.gloucester.gov.uk/media/3435/gloucester-2019-asr.pdf>

- 3.52 The energy consumption figures for Gloucester in 2013<sup>63</sup> were as follows:
- 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
  - Electricity – a total of 606.2 GWh predominantly through industrial and commercial.

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.

- 3.53 The emissions figures (by sector) for Gloucester in 2013<sup>64</sup> were as follows:
- 281.6 kt CO<sup>2</sup> from Industry and Commercial
  - 229.2 kt CO<sup>2</sup> from Domestic
  - 117.0 kt CO<sup>2</sup> from Transport

Emissions from all sectors have been steadily decreasing since 2005, and as identified above, Industry and Commercial remains the highest contributor to emissions of CO<sup>2</sup> in Gloucester.

- 3.54 The Climate Change Strategy<sup>65</sup> targets actions in the topic areas of buildings, transport, waste, water resources, renewable energy, biodiversity and adaptation. Each topic sets a suite of actions to address climate change issues, these include (but are not limited to):
- Gloucestershire Energy Efficiency Advice Centre
  - Affordable Warmth Strategy
  - Energy Management Strategy for council owned buildings
  - Solar hot water for housing
  - Improvements to cycle paths
  - The adoption of travel plans for schools and businesses
  - Farmers market
  - New bus station
  - Reduced residual waste collections to increase the incentive to recycle
  - Encouraging the use of water butts
  - Gloucestershire Renewable Energy Action Plan
  - Investigating potential for hydro power at Llanthony weir
  - Severnside Countryside Management Project
  - Climate sensitive planting schemes
  - Increased use of surface water management plans
  - Re-use of buildings

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<sup>63</sup> DECC (2013) Sub-national total final energy consumption statistics: 2005-2013

<sup>64</sup> DECC (2015) 2005 to 2013 UK local and regional CO<sub>2</sub> emissions full dataset

<sup>65</sup> Gloucester City Council, Gloucester City Climate Change Strategy 2010

- 3.55 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, 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**

- 3.56 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.
- 3.57 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
- 3.58 Gloucester lies within the Severn Vale catchment, part of the wider Severn River Basin District. Within the Severn Vale Catchment there are two operational catchments: Gloucester Tributaries and Severn River and Tributaries. 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'.

- 3.59 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'.
- 3.60 The Severn River Basin RBMP reports that 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.
- 3.61 Flood risk is high in many parts of Gloucester, particularly around the north, west and south west of the Plan area. Gloucester City is drained entirely by the River Severn, which has both tidal and fluvial influences in the area. Flood Zone maps<sup>66</sup> for the River Severn extend for large distances into the Plan area. The flood risk to Gloucester is predominantly fluvial as the River Severn channel becomes narrower, providing a restriction to high tides moving upstream and river flows moving downstream. The main areas at risk are on the Sud Brook around the Tredworth and Linden areas and on the Whaddon Brook around the Podsmead area. Evidence<sup>67</sup> indicates that the raising of defences at certain sites around Gloucester, in particular around Westgate, will deliver the most benefit.
- 3.62 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. The Gloucester and Sharpness Canal is located within Gloucester City. 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.
- 3.63 The Level 1 SFRA<sup>68</sup> reports 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

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<sup>66</sup> Environmental Agency; Flood Map for Planning (from Rivers and the Sea)

<sup>67</sup> Gloucester City Council (2016) Topic Paper: Flooding

<sup>68</sup> Halcrow Group Ltd (2008) Gloucestershire County Council Strategic Flood Risk Assessment Level 1

increased storm surges and wave height. The scope of the SFRA Level 2<sup>69</sup> was determined in 2017.

- 3.64 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.
- 3.63 Damages during the one per cent annual probability flood event, increase by 17% to £110 million under the 100-year horizon future scenarios<sup>70</sup>. The scale of damage therefore remains high. The SFRA<sup>71</sup> recommends that the local authority consider using the climate change maps to carry out the Sequential Test, in order to give a particularly long-term risk-based approach to planning.
- 3.64 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**

- 3.65 The Housing Monitoring Report<sup>72</sup> identifies that in the period between 1 April 2014 and 31 March 2015 the gross completion figure for new dwellings in Gloucester was 568. Of these completions the majority (388) were located on previously developed (brownfield) land.
- 3.66 Defra<sup>73</sup> identifies bands of agricultural land on the outskirts of Gloucester City particularly; to the north around Longford; in the east and south-east around Brockworth; and to the south around Quedgeley and Hardwicke.

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<sup>69</sup> [https://www.gloucester.gov.uk/media/1844/strategic\\_flood\\_risk\\_assessment\\_level\\_2\\_gloucester\\_city\\_plan\\_sites.pdf](https://www.gloucester.gov.uk/media/1844/strategic_flood_risk_assessment_level_2_gloucester_city_plan_sites.pdf)

<sup>70</sup> Ibid.

<sup>71</sup> Ibid.

<sup>72</sup> Gloucester City Council (2015) Housing Monitoring Report

<sup>73</sup> DEFRA Magic Map Application [online]



- 3.67 Like many other urban areas in the UK, Gloucester has had a long industrial history, which along with more recent activities, can cause contamination of the ground. In 2009<sup>74</sup> it was identified that nearly 400 site contamination investigation and remediation reports were on file with Gloucester City Council. The contaminated land register<sup>75</sup> identifies that all properties determined on the register as contaminated land (properties at Westend Parade, Alney Terrace, Fair View Caravan Site, and Pool Meadow Caravan Site) have been appropriately remediated.
- 3.68 New 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**

- 3.69 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.
- 3.70 There are two Sites of Special Scientific Interest (SSSIs); Hucclecote Meadows SSSI is a 5.75ha site located in the east of the City, and Robin's Wood Hill Quarry SSSI is a 1.93ha site located in the south of the City. Both are in favourable condition<sup>76</sup>. Hucclecote Meadows is a series of lowland meadows overlying Lower Lias clays in the Severn Vale on the outskirts of Gloucester. The meadows contain the Priority Habitat of Lowland Neutral Grassland (MG4 and MG5) and represent one of the few remaining areas of such herb-rich ancient pastures in the county, traditionally managed for hay and stock grazing<sup>77</sup>. The Robin's Wood Hill Quarry SSSI forms part of the Robinswood Hill Country Park and provides the best inland section of Lower Jurassic, Middle Lias strata in Britain, with a complete section of the Upper Pliensbachian Stage present. The geology of the site has been intensively studied, particularly the diverse faunas which it yields<sup>78</sup>.
- 3.71 The County area contains a number of locally designated biodiversity and geodiversity sites including; 9 Local Nature Reserves (LNRs), 6 Key Wildlife Sites (KWSs) and 28 other sites of Nature Conservation Interest. The Open Space Strategy<sup>79</sup> identifies that six of the designated Local Nature Reserves are

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<sup>74</sup> Gloucester City Council (2009) Contaminated Land - An Inspection Strategy for Gloucester

<sup>75</sup> Gloucester City Council (2016) Public Register of Contaminated Land

<sup>76</sup> DEFRA Magic Map Application [online].

<sup>77</sup> Natural England Designated Sites View [online].

<sup>78</sup> Ibid.

<sup>79</sup> Gloucester City Council Open Space Strategy 2014 - 2019

located within Gloucester city. The Gloucestershire Nature Map<sup>80</sup> identifies the strategic connectivity of nature areas at the county level, which are connected through the following habitats:

- Coastal and Floodplain Grazing Marsh
- Lowland Calcareous (Limestone) Grassland
- Lowland Meadows (including Traditional Orchards)
- Wet Grasslands
- Woodland Mosaic (including Heathland, Acid Grassland and Traditional Orchards)
- Rivers
- Severn Estuary

It is evident from this map that there are numerous opportunities to create new connections between existing habitats, to enhance connectivity between river corridors.

- 3.72 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**

- 3.73 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.
- 3.74 Townscape improvements in Gloucester include<sup>81</sup>:
- Significant public realm improvements between Gloucester Quays and Kimbrose Triangle / Southgate Street
  - Kings Quarter Regeneration Area, including the development of a new bus station (and demolition of the old bus station) and improved linkages 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

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<sup>80</sup> [www.gloucestershirenature.org.uk](http://www.gloucestershirenature.org.uk)

<sup>81</sup> Gloucester City Council Promoted Capital Works and Gloucester City Council Officer advice

- 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

3.75 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**

3.76 There are over 700 Listed Buildings and 26 Scheduled Monuments in Gloucester, a significant number of which are located within the City centre. Westgate Street has the greatest concentration, with 79 Listed Buildings, 14 of which are Grade I or Grade II\* Listed. The most recent survey into the condition of these assets in 2013 identified 26 buildings as 'at risk' and a further 17 as vulnerable of becoming so<sup>82</sup>. There are also 14 Conservation Areas, as listed below:

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

3.77 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 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.

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<sup>82</sup> Gloucester City Council (2013) Buildings at Risk

- 3.78 Southgate Street has been subject to the Townscape Heritage Initiative (THI), 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.
- 3.79 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.
- 3.80 Evidence<sup>83</sup> suggests that the heritage of the city is a central component in the identity of the city. It defines much of what is locally distinctive about the city and that impacts on how the city's residents and visitors feel, use and perceive the city. It is central to Gloucester's civic pride, status, sense of place and the sense of continuity in times of change.
- 3.81 Without the plan, designated heritage assets would still be protected through National and Local policy. The GCP and SA can consider the cumulative effects of proposed development on designated and non-designated heritage assets and their settings. The Plan can thus provide a delivery mechanism for enhanced protection for undesignated assets, settings and features that contribute to the local 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.

### **Minerals and Waste**

- 3.82 The Gloucestershire Minerals Local Plan<sup>84</sup> reports 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.
- 3.83 Waste management is also coordinated at the County level<sup>85</sup>. The four main types of waste produced in Gloucestershire are; Municipal Solid Waste (MSW), Commercial and Industrial, Construction and Demolition, and Hazardous

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<sup>83</sup> Gloucester City Council (2016) Topic Paper: Historic Environment

<sup>84</sup> Gloucestershire County Council (2014) Minerals Local Plan Site Options and Draft Policy Framework Consultation Document

<sup>85</sup> Gloucestershire County Council (2012) Waste Core Strategy

waste. MSW is the waste 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.

- 3.84 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.
- 3.85 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 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

- 3.86 Key sustainability issues were presented in the Sustainability Appraisal Statement (February 2012), and had been identified from Scoping Reports and SA work for the GCT JCS and the early work on the City Plan. Following the updated review of plans and programmes and baseline information, these key sustainability issues were reviewed and updated with minor amendments made. The updated key sustainability issues are set out 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.

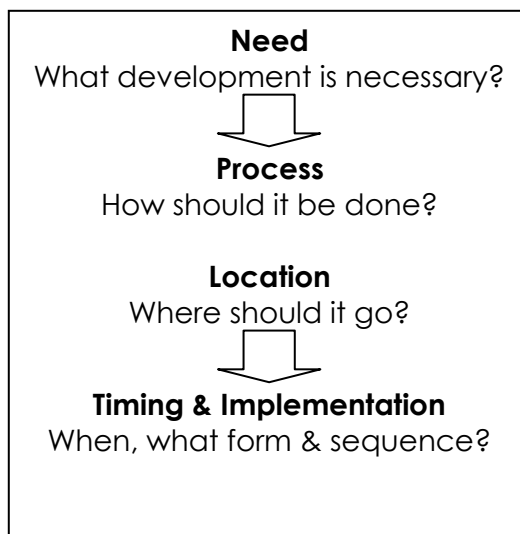
There is a need to encourage a move away from the dependence on the private car.
There is a need to ensure carbon emissions are minimised.
Previously developed land may be subject to contamination.
The City needs to protect areas of public open space and green corridors/networks, and ensure open spaces 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 ALTERNATIVES IN SUSTAINABILITY APPRAISAL & OPTIONS IN PLAN MAKING

### Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive<sup>86</sup> requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance<sup>87</sup> that it means “realistic and deliverable” and within the timescale of the plan.
- 4.2 SEA guidance sets out an approach and methods for developing and assessment of 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 Case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment<sup>88</sup> confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to,

<sup>86</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>87</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>88</sup> Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.

- 4.4 The Broadlands Judgment<sup>89</sup> drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment<sup>90</sup> confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of a 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 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.

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<sup>89</sup> Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

<sup>90</sup> Cogent Land LLP v Rochford District Council (2012) EWHC 2542



- 4.8 The role of the SA is to inform the Council 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 City 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, Submission in 2014, and continuing during the Examination stages 2015-2016 with Main Modifications and adoption in December 2017. 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.
- 4.10 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).
- 4.11 **City Plan Parts 1&2 Initial SA Reports**<sup>91</sup> (2012 & 2013): The initial SAs explained that there is limited possibility for investigating options through the Gloucester City Plan. The GCP 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 through public consultation in May – July 2013<sup>92</sup> with the next stage of plan preparation and Sustainability Appraisal. The likely significant effects (positive and negative) of potential site options 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.
- 4.12 **Draft Gloucester City Plan (2017) & SA Report**<sup>93</sup>: All reasonable options for new development identified through the calls for sites and site assessment process/Strategic Assessment of Land Availability (SALA) were progressed at this stage as proposed site allocations. It may be remembered that Gloucester City is not able to meet its identified housing and employment land need through available land within the City Council's area. Therefore, all site options that have been identified as reasonable (suitable and deliverable) have been progressed.

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<sup>91</sup> <https://www.gloucester.gov.uk/about-the-council/strategies-plans-policies/city-plan/>

<sup>92</sup> *ibid*

<sup>93</sup> <https://gloucester.inconsult.uk/consult.ti/draftgloucityplan/consultationHome>

- 4.13 **Pre-Submission GCP & SA 2019:** Responses to the consultation on the Draft Plan were considered and the GCP was further developed into the Pre-Submission stage. The options for sites were updated to take account of changes such as revised capacities and the proposed sites confirmed as allocations.
- 4.14 Thus, the plan-making process has identified the reasonable options available for proposed allocation as local sites in the GCP and these have been subject to SA. A requirement remains to find more local sites to meet the need for the GCP.

## 5.0 INTEGRATED APPRAISAL OF THE DRAFT GLOUCESTER CITY PLAN (2016)

### Vision and Development Principles

5.1 The Draft GCP included 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 were as follows:

- |   |
|---|
| <b>1.</b> 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 |
| <b>2.</b> To ensure that new development is supported by the necessary infrastructure   |
| <b>3.</b> 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   |

<b>4.</b> To develop a City Centre that provides for the needs of the 21 <sup>st</sup> Century, with increased choice, an improved environment and to protect it from inappropriate competition in other locations
<b>5.</b> To provide a balanced network of local and district centres that provide for the everyday shops, services and facilities needed by the local community.
<b>6.</b> 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.
<b>7.</b> 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.
<b>8.</b> To improve educational attainment, skills and learning opportunities.
<b>9.</b> 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.
<b>10.</b> 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.
<b>11.</b> To tackle poverty and deprivation in the worst affected areas of the City.
<b>12.</b> 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.
<b>13.</b> 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.
<b>14.</b> 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 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 was 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 was again recommended that the Principles could be enhanced by including

wording that seeks to minimise waste generation and promotes the waste hierarchy.

### Proposed Site Allocations

- 5.6 As Gloucester City Council is unable to meet its identified housing needs, most potential site options 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 that have not been carried forward into the GCP Potential Site Allocations 2016. These sites, along with the reasons for rejection are summarised 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 Draft 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 Proposed Site Allocations**

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

### **Synergistic and Cumulative Effects**

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

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

### **Interrelationships with other Topics**

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

#### **Economy and Employment**

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

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

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

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

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



deliver synergistic gains like public realm improvements, which can indirectly lead to long-term major positive effects on the economy by attracting new and ongoing investment and renewal.

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

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

### **Appraisal of Proposed 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 Equality

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

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

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

## Appraisal of Draft GCP Policies

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

employment, and services and facilities are highest. Planned and targeted growth can thus contribute to reducing inequalities with the potential for major long term positive effects.

- 5.29 Development can also support healthy and active communities through the delivery of networks of open and green space, and attractive and safe streets and pedestrian walkways / cycle paths which connect to local services and facilities. Coordinated development can deliver direct health benefits (e.g. increased levels of walking / cycling) and support a modal shift that can contribute to long term climate change mitigation and indirectly support health and wellbeing through healthy functioning ecosystems. Given the urban and built up nature of Gloucester, the GCP has significant opportunities to deliver health benefits in this respect. The policies contained within the Draft GCP seek to retain, enhance and improve access to open space; however, it is considered that the policy framework could be strengthened by seeking to improve the connectivity between these areas to promote a network of connected recreational spaces. It is considered that this is more likely to promote synergistic effects (for example connected spaces along waterways creating attractive routes for jogging and recreational cycling) in line with the Gloucester Open Space Strategy<sup>94</sup>. Policies D1 and D3 support active design and strategic connectivity to promote walking and cycling. Policy D4 further requires allotment provisions which can contribute to healthy lifestyles. These policies are considered likely to lead to long term positive effects on health and wellbeing.

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

### **Appraisal of Proposed 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 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

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<sup>94</sup> Gloucester City Council (2014) Open Space Strategy 2014 - 2019

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 Proposed Site Allocations**

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

of greater significance. It should also be noted that the assessment will be updated to reflect the findings of transport modelling when this evidence emerges, and this should remove uncertainties arising from the information gaps.

### **Synergistic and Cumulative Effects**

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

### **Interrelationships with other Topics**

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

#### **Air Quality**

SEA Directive Topics: Air

Relevant SA Objectives:

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

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

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

- 5.40 As identified in the baseline information, the main source of atmospheric pollution in Gloucester arises from traffic on the roads, and there are three designated Air Quality Management Areas (AQMAs) within Gloucester City. Development therefore should seek to reduce traffic levels by; promoting access to and increased usage of sustainable modes of transport, and by increasing access to services, facilities and employment opportunities to reduce the need to travel. The nature and significance of effects with regards to air quality are closely linked to the appraisal for traffic, transport and

accessibility, which found that there are not likely to be any significant negative effects on traffic as a result of the proposed development.

- 5.41 The GCT JCS provides mitigation to reduce potential negative effects on air quality. GCT JCS Policy SD4 requires development proposals to demonstrate that they are avoiding unnecessary pollution of air, while Policy SD15 seeks to protect and improve environmental quality, reiterating the requirements of Policy SD4 but also considering cumulative effects. This is supported by the transport and accessibility policies as outlined in the transport and accessibility policy appraisal above (e.g. Policy INF1 in the GCT JCS and Policy D3 in the Draft GCP). The potential negative effects are also mitigated by Policy PD4 in the Local Transport Plan 3<sup>95</sup> (LTP3) which seeks to work with the District Councils to improve air quality.
- 5.42 The Draft GCP does not repeat the policies contained within the GCT JCS or LTP3, but it does seek to ensure through a number of policies that the environmental impacts of development are minimised. This includes Policy G12 seeking to achieve high quality design that positively contributes to climate change mitigation and adaptation, and Policy D10 which seeks to reduce air pollutants in localised sources and requires air quality assessments where appropriate. Given these findings, alongside the findings of the appraisal for transport and accessibility it is not considered likely that the Draft GCP will have significant negative effects on air quality.

### **Appraisal of Proposed Site Allocations**

- 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

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<sup>95</sup> Gloucestershire's Local Transport Plan 2015-2031 – Overarching Strategy



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 Proposed Site Allocations**

- 5.51 The SA Framework has considered that all site allocations have the potential to meet energy efficiency standards, using sustainable design and construction methods and principles, with the potential for minor positive effects on climate change mitigation and adaptation.
- 5.52 The appraisal of site allocations has found that although the majority of the sites have the potential for minor negative effects on traffic and the highways network, and subsequently air quality, given the capacity of the sites, the mitigation provided through GCT JCS and Draft GCP policies should reduce the extent of these effects, with the potential for a residual neutral effect at most site allocations. Development within the housing zones (Greater Blackfriars and the Railway Corridor) and at site allocations 18, 20, 22, 29, 41 and 44 were considered to have the potential for residual minor negative effects given the higher capacity of these sites, and are thus considered to have the potential for indirect negative effects for air quality and therefore climate change. The Draft GCP also seeks to increase access to sustainable modes of transport and encourage a modal shift which will contribute to reducing the extent of these effects.
- 5.53 Site allocations located on greenfield land are considered to have the potential for severance of green infrastructure. Research has also demonstrated that brownfield sites can support a wide range of habitats and species<sup>96</sup> and thus have significant biodiversity values and it is recommended that Phase 1 Habitat Surveys are undertaken at early stages on brownfield sites to identify their biodiversity value and the required level of mitigation if necessary. The site allocations therefore are all likely to contribute to healthy

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<sup>96</sup> TCPA (2004) Biodiversity by Design – A guide for sustainable communities

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 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 Proposed 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 & Historic Environment**

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 Proposed 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 Proposed Site Allocations

- 5.80 The appraisal of the site allocations found that the majority of the sites have the potential for a residual neutral effect on biodiversity. Development at site allocations 21 and 41 is considered to have the potential for minor negative effects due to the presence of locally designated biodiversity or protected species/habitats on site, however, mitigation provided through GCT JCS and Draft GCP policies is considered sufficient to ensure that there will be no significant negative effects.
- 5.81 A large proportion of the site allocations are located on brownfield land. Research has demonstrated that brownfield sites can support a wide range of habitats and species<sup>97</sup> and thus have significant biodiversity values. In this respect Phase 1 Habitat Surveys could help to identify biodiversity values at the site allocations. Mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects on biodiversity, however the presence of important species on site has the potential to delay development whilst appropriate surveys and mitigation 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.

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<sup>97</sup> TCPA (2004) Biodiversity by Design – A guide for sustainable communities

## **Soil**

SEA Directive Topics: Soil

Relevant SA Objectives:

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

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

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

- 5.84 The Plan area contains small areas of best and most versatile agricultural land on the peripheral of the city, and development has the potential to negatively affect soil quality through direct loss of this resource, or by potential contamination effects. The Minerals Local Plan<sup>98</sup> also safeguards 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 Proposed 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.

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<sup>98</sup> Gloucestershire County Council (2014) Minerals Local Plan Site Options and Draft Policy Framework Consultation Document

### **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 Proposed Site Allocations**

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

ensure that development positively contributes to the historic environment of Gloucester.

### **Synergistic and Cumulative Effects**

- 5.98 Much of the development proposed within the Draft GCP is located centrally supporting the identified regeneration zones and development of the central area. The majority of Conservation Areas and Listed Buildings are concentrated in the central area, and much of this is also an Area of Principal Archaeological Interest. Cumulatively therefore development has the potential to significantly change the setting of the central area and historic core of Gloucester. Overall the GCT JCS and Draft GCP seek to protect and enhance heritage, as well as avoid development that would have a negative effect on the significance of designated and non-designated heritage assets and / or their setting. There is an element of uncertainty until project level details arise. However, it is recognised that development has the potential for negative effects from the integration of new development, but also for positive effects from successful integration that supports community needs, positively contributes to the setting, involves the re-use of redundant or disused Listed Buildings, and raises awareness. It is considered that there is suitable mitigation available through GCT JCS and Draft GCP policies to ensure that there will be no major negative cumulative effects on heritage assets and / or their settings.

### **Interrelationships with other Topics**

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

#### **Waste and Recycling**

SEA Directive Topics: Material Assets

Relevant SA Objectives:

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

Relevant GCP Topics Paper(s): Design

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

- 5.100 Development has the potential to increase waste generated, both through construction, and as a result of occupation of new housing and employment development. The policies contained within the Waste Core Strategy<sup>99</sup> provide mitigation for the negative effects associated with an increase in waste, including Policy WCS2 which seeks waste reductions, and Policy WCS3

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<sup>99</sup> Gloucestershire County Council (2012) Gloucestershire Waste Core Strategy

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 Proposed 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 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.

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

- 5.104 Under the Equality Act 2010, public authorities such as Gloucester City Council must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
  - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
  - Foster good relations between people who share a characteristic and those who do not share a characteristic.
- 5.105 An EqIA is a tool which seeks to improve the work of the Council and ensure that they meet the requirement of the Equality Act 2010. This Act applies to the provision of services and public functions and includes the development of Council policies and plans. The Act prevents discrimination on the basis of

nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

- 5.106 Inequality can exist in a number of forms and where land use planning is concerned, this can include inadequate provision of and access to services (health, food stores, education facilities), good quality homes, employment opportunities, a healthy living environment and transport infrastructure (roads, pavements, public transport) for all members of society.
- 5.107 It is important to note that assessment of equality, diversity, and health/wellbeing (which is an important aspect of equality) has been detailed through the SA process. All aspects of the development Draft GCP have been appraised against an SA Framework including several SA objectives that directly and indirectly address equality, health and diversity and these include: No.3, No.5, No.6, No.8, No.9, No.12, No.13, No.14, No.16, No.17, No.18, No.19, No.20, No.24, No.25. The findings of the EqIA have been integrated into the SA of the Draft GCP and are provided separately as Appendix V to this SA Report.
- 5.108 The screening assessment has found that the Draft GCP is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

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

- 5.109 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites<sup>100</sup>.
- 5.110 The HRA process for the GCP is informed by the findings and conclusions of the HRA process for the GCT JCS. The Pre-Submission Draft GCT JCS HRA Report<sup>101</sup> (May 2014) concluded that the mitigation provided through GCT JCS policies and available at the project level is sufficient to ensure that there will be no adverse effects on any European sites as a result of proposed development either alone or in combination.
- 5.111 An initial screening assessment of the Draft GCP was carried out to determine if the emerging policies and potential sites have the potential for likely significant effects on any European sites. The screening found that none of the European sites identified will suffer from significant alone or in combination effects from atmospheric pollution, disturbance or changes in water levels and quality caused by the Draft GCP. The screening found that although some sites were at risk to significant effects, policy mitigation provided through the Draft GCP and GCT JCS was comprehensive enough to ensure that the European sites will not be affected.

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<sup>100</sup> These include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

<sup>101</sup> <https://www.jointcorestrategy.org/jcs-examination-document-library>

## 6.0 SUSTAINABILITY APPRAISAL OF THE GLOUCESTER CITY PLAN PRE-SUBMISSION (2019)

### Context & Developing the Draft Plan from Regulation 18 to Pre-Submission Regulation 19

- 6.1 The City Council considered the representations<sup>102</sup> made to the draft GCP at the Regulation 18 consultation stage and has made amendments to further develop the Plan to the Pre-Submission stage. Many of the changes are minor and most relate to updating, addressing gaps in information and provision of more clarity. Most Policies have been refined through these minor amendments. Certain Policies have been developed that are likely to be significant for the findings of the previous SA and including a new Policy E8 on Development affecting the Cotswold Beechwoods Special Area of Conservation.
- 6.2 JCS Policy SP1 sets out that at least 14,359 new homes will be needed in the Gloucester City area over the plan period 2011 to 2031. As of April 2019, 3,993 homes have already been delivered since 2011 and there are 2,339 commitments. 972 dwellings are proposed through the site allocations SA01- SA22 in GCP with a number of the bigger sites being central brownfield sites in need of regeneration. 620 new homes will be delivered through the Winneycroft Strategic Allocation south of Matson estate in Gloucester and 4,520 through the Strategic Allocations in Tewkesbury Borough allocated to meet Gloucester's housing need. A further 375 dwellings within these Strategic Allocation are projected to be delivered after 2031.
- 6.3 Despite this provision there is a shortfall for Gloucester of over 1,000 dwellings in the later years of the JCS timeframe. It is likely that some of this shortfall will be made up through sites or opportunities that come forward in Gloucester, but some of the provision is likely to be found through the JCS Review process.
- 6.4 Windfall development in Gloucester will have to accord with GCP Development Management policies that will, alongside those in the JCS, guide development over the plan period to 2031.
- 6.5 The Site Allocations have been amended to reflect the updated situation. Seven previously proposed site allocations have been removed as these now have planning permissions or there is uncertainty over availability/deliverability; 12 previously proposed site allocations are still available, deliverable and have been progressed further into the Regulation 19 GCP. A further 10 new site options have been identified and were found to be reasonable such that they have been subject to SA using the full SA framework (reported here in Appendix IV).
- 6.6 The changes to the Plan through development from Draft to Pre-Submission and with significance for the SA are summarised in Table 6.1, as follows:

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<sup>102</sup> <https://gloucester.inconsult.uk/consult.ti/draftgloucestercityplan/consultationHome>



**Table 6.1: Changes to the Plan with Significance for SA**

<b>GCP Policy</b>	<b>Summary of Changes relevant to the SA</b>
Key Principles	Rearrangement & refinement for clarification
A1 Effective use of land & buildings	Merging of previous policies for updating with new NPPF requirement re density
A2 Affordable Housing	New policy reflecting comments received during consultation
A3 Estate regeneration	Additional criteria for justification and clarification
A4 Student accommodation	Additional text to justify need and safeguard against loss
A5 Specialist Housing	Rewording for clarification and additional text
A7 Self build & custom build	New policy to reflect new NPPF requirement
B2 Safeguarding employment sites	Merging of previous employment policies for clarification
B3 New employment	Merging of previous employment policies for clarification; includes intensification/improvements to existing employment land
B4 Development Docks & Canal	New policy addressing development within or adjacent to the Gloucester Docks & Canal
C2 Allotments	Updating to reflect emerging Open Space Strategy – not significant with regard to the SA findings
C3 Open space, playing fields & built sports facilities	Merging of previous policies for clarification & updating to reflect emerging Open Space, Built Sports & Playing Pitch Strategies - not significant with regard to the SA findings
C4 Hot food takeaways	Expanded – not significant with regard to the SA findings
C5 Air Quality	Expanded to include additional criteria and new mitigation options
C8 Changing Places Toilets	New policy to address consultation comments for specific standard – not significant with regard to the SA findings
D2 Non-designated heritage assets	Additional text to cover design, new build & demolition of assets
E1 Landscape	Additional requirement to retain trees & hedgerows
E2 Biodiversity & Geodiversity	Merging of previous policies for clarification. Additional reference to ecological networks; all development is required to provide net gains to the ecological network & proposals that affect local sites must secure a net gain in biodiversity (and in line with the revised NPPF <sup>103</sup> ). Three new criteria for different categories of designation from international to local & sets out explicitly the requirements from new development for each. Criterion 1 sets out that there must be no adverse effects on the integrity of internationally designated sites.

<sup>103</sup> <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

E4 Protection of trees & hedgerows	Expanded and includes requirement for measurable net gains.
E6 Flooding, sustainable drainage, watercourses & wastewater	Expanded for clarification including requirements for mitigation measures – financial contributions to flood risk infrastructure.
E8 development affecting Cotswold Beechwoods SAC	New policy addressing concerns raised by NE regarding the HRA & likely significant effects through increased recreational disturbance.
F5 Open plan estates	New policy to reflect comments regarding a very local specific issue – not significant for the SA.
F6 Nationally prescribed space standards	New policy to reflect updated NPPF requirement for nationally prescribed space standards – not significant for the SA.
G1 Sustainable transport	Additional text for policy requirements
G2 Charging infrastructure for electrical vehicles	New policy to reflect changing requirements
G3 Cycling	New policy to address changing concerns re climate change
G4 Walking	New policy to address changing concerns re climate change
G5 Broadband connectivity	New policy to address local issue
G6 Telecommunications	New policy to address identified shortcoming in the adopted JCS
G7 Water efficiency	New policy to reflect consultation comments and updated evidence
G8 Review mechanism	New policy to strengthen the council's ability to seek compliance with relevant policies over the lifetime of a project.

### Proposed Site Allocations

- 6.7 The SEA Regulations require that the outline reasons for selection or rejection of reasonable alternatives should be outlined in the SEA/SA Report. At the Regulation 18 consultation stage in 2017, this outline reasoning for progression or not of site options was outlined in Table 5.1 and as presented in the previous section of the SA Report. The reasoning for selection or rejection of sites from the Regulation 18 stage to the Regulation 19 stage is outlined in the Table 6.2, as follows:

**Table 6.2: Reasons for Selection or Rejection of Site Options to Proposed Allocations**

<b>GCP Reg 19 Ref &amp; Name</b>	<b>SALA; IA; GCP Reg 18 Refs</b>	<b>Outline Reasons for Selection or Rejection of Site Options to Proposed Allocations at Pre-Submission, Regulation 19 Stage</b>
<b>SA01 Land at Wheatridge</b>	SUB09; IA10; SA01	Previously progressed as SA01 Land at the Wheatridge in 2017; retained as the site is deliverable for residential development with open space and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA02 Land at Barnwood Manor</b>	SUB25; IA30; SA02	Previously progressed as SA02 Land at Barnwood Manor in 2017; retained as the site is deliverable for residential development with open space and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
Gloucester Mail Centre	SA03	Planning permission granted for 48 dwellings under prior approval (18/00336/JPA).
Helipebs	IA12 SA04	Not progressed now as uncertainty about availability.
Allstone (SA19 in small part)	03NEW18; IA29	Not progressed in 2017 as suitability not justified for loss of employment land; overall site not progressed because parts of the site already benefit from planning permission granted for 200 dwellings & 200 student units 16/00948/OUT; small part of site 0.36 ha c 10 dwellings progressed as SA19 Land off Myers Road in 2019 (please see later)
Former Civil Service Club	IA13 SA06	Not progressed as already benefits from planning permission granted for 100 dwellings 18/00306/FUL
<b>SA03 Former Prospect House, 67-69 London Rd</b>	ED044; IA14; SA07	Previously progressed as SA07 in 2017; retained as the site is deliverable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA04 Wessex House</b>	SUB51; IA15; SA08	Previously progressed as SA08 in 2017; retained as the site is deliverable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA05 Land at Great Western Road Sidings</b>	HA20A; IA171 SA09	Previously progressed as SA09 in 2017; retained as the site is deliverable for residential development and there are no insurmountable constraints that cannot be mitigated to provide

		a sustainable allocation for meeting housing needs.
Land off Leven Close	IA19 SA10	Not progressed as already benefits from planning permission granted for 10 dwellings 16/01558/OUT
Land adjacent to St Aldates	IA SA11	Not progressed as already benefits from planning permission granted for 23 dwellings 14/00449/FUL
<b>SA06 Blackridge Sports &amp; Community Hub</b>	01NEW17; IA48 SA12	Previously progressed as SA12 in 2017; retained as the site is deliverable for sport development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting such needs.
<b>SA07 Lynton Fields</b> , part of Land East of Waterwells Business Park	EA03; IA20 SA13	Previously progressed as SA13 in 2017; two major parcels of land now benefit from planning permissions for housing. Therefore, small part of site retained for progression as employment land.
Land at Clearwater Drive	IA21 SA14	Not progressed as already benefits from planning permission granted for a school 17/00729/FUL.
<b>SA08 Kings Quarter</b>	HA02;	Previously SA15 in 2016 and continues to be progressed as mixed-use development with no insurmountable constraints and opportunities to be gained from this major adopted regeneration in the City Centre. Now includes 104 Northgate St – previously progressed as SA08 in 2017.
<b>SA09 Former Quayside House</b> (part of Greater Blackfriars)	HA17; IA2; part of SA16	Previously progressed as SA16 Greater Blackfriars in 2017; retained in 2019 as mixed-use development with no insurmountable constraints and opportunities to be gained from this major adopted regeneration in the City Centre.
<b>SA10 Former Fleece Hotel &amp; Longsmith St Car Park</b>	HA17; IA5; part of SA16	Progressed as SA16 Greater Blackfriars in 2017; retained in 2019 as housing development with no insurmountable constraints and opportunities to be gained from this major adopted regeneration in the City Centre.
Southgate Moorings Car Park	FS02; IA7; SA17	Previously progressed as part of SA17 Southgate Moorings in 2017 but not retained in 2019 as the site is no longer available.
104 Northgate Street (now part of SA08)	SA10; IA9; SA18	Previously progressed as SA18 104 Northgate Street in 2017; now progressed as part of SA08 mixed-use development with no insurmountable constraints and opportunities to be gained from this major adopted regeneration in the City Centre.
Land adjacent to Eastgate	FS16; IA26; SA19	Previously progressed as SA19 retail/employment land in 2017; now no longer

Shopping Centre		allocated as it is more appropriately addressed through the JCS Retail Review.
<b>SA11 Land at St Oswalds</b>	SUB28; IA28; SA20	Previously progressed as SA20 in 2017 and retained for housing development in 2019 as there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA12 Land at Rea Lane</b>	SUB54; IA25; SA23	Previously progressed as SA23 Land at Rea Lane in 2017; retained for progression in 2019 as residential development with no insurmountable constraints and opportunities to be gained from this location.
<b>SA13 Former Colwell Youth &amp; Community Hub</b>	06NEW18; IA46	New site available and progressed as suitable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA14 Land off New Dawn View</b>	03NEW17; IA47	New site available and progressed as suitable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA15 Land south of Winnycroft Allocation</b>	07NEW17; IA49	New site available and progressed as suitable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA16 Land off Eastgate Street</b>	05NEW17; IA50	New site available and progressed as suitable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA17 Southern Railway Triangle</b>	HA20B; IA51	New site available and progressed as suitable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA18 Jordans Brook House</b>	02NEW18; IA52	New site available and progressed as suitable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
<b>SA19 Land off Myers Road</b>	03NEW18; IA29	New site available and progressed as suitable for residential development and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting housing needs.
Glevum Works	NEW18; IA53	Previously appraised as part of FS09 Rear of Smith & Choyce, Upton Street; not progressed further in 2019 because no longer available.

<b>SA20 White City Replacement Community Facility</b>	NEW18; IA54	New site available and progressed as community redevelopment and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting community needs.
<b>SA21 Part of West Quay, the Docks</b>	NEW18; IA55	New site available and progressed as suitable for residential redevelopment and there are no insurmountable constraints that cannot be mitigated to provide a sustainable allocation for meeting community needs.
<b>SA22 Secunda Way Industrial Estate</b>	IA SA22	Previously progressed in 2017 as SA22 for employment use. It is now being promoted instead for residential use; however, the Council considers that it is most suitable for employment use and therefore, the site is retained for allocation for such use in 2019.

### Representations to the Regulation 18 SA Report (2016)

- 6.8 Comments were received from the statutory environmental regulators, Environment Agency (EA) and Natural England (NE); details are provided in Appendix VI of this SA Report (July 2019). No comments were received at this stage from Historic England. The EA advised that they had no specific comments yet on the SA or HRA, although they did advise that the lack of a Strategic Flood Risk Assessment (SFRA) Level 2 should be highlighted in the SA as a gap/lack of evidence.
- 6.9 NE were concerned about increased recreational disturbance on the Cotswold Beechwoods SAC and this is addressed in the updated HRA Report and summary findings integrated later into this SA Report. NE also advised about the growing awareness of the potential for recreational pressures to impact on the Severn Estuary Special Area of Conservation (SAC) / Special Protection Area (SPA) / Ramsar site, particularly on the bird populations for which the SPA and Ramsar site are designated. Whilst the site's designated boundaries are some distance away (8.1km), the Gloucester City Plan area abuts the River Severn. SPA/Ramsar birds continue using the estuary and river beyond the designation. The river is functionally linked to the designated site and the life and productivity of the SPA birds. Again, this has been addressed through the updated HRA and summary findings integrated later into this SA Report.
- 6.10 Stroud District Council (SDC) suggested that it could be questioned whether increased development in Gloucester could actually result in significant increases in recreational disturbance on the Cotswold Beechwoods SAC but particularly the Severn Estuary which has features which are more susceptible to such an effect. SDC drew attention to the Severn Estuary Visitor Study.
- 6.11 One developer commented that the SA Framework of Objectives had not been used to assess each policy individually. It was responded that whilst

each site option was subject to individual SA using the full framework, this was not applied to the other policies to avoid duplication and repetition and unnecessary numbers of matrices. Another developer asserted that Land at Mill Place and Land off Rudloe Road have not been subject to SA. It was responded that all site options that are considered to be reasonable alternatives (suitable and deliverable) through the site assessment process will be subject to SA.

### **Refining Policies: Implications for SA Findings**

- 6.12 **GCP Vision & Key Principles:** The Vision remains unchanged – the initial SA in 2017 found that most of the elements of the Vision were compatible; no adverse effects or significant incompatibilities were identified. The emerging Key Principles were tested through SA by compatibility analysis using the full SA framework of 25 SA Objectives and subject to consultation in 2017. The initial SA found mostly neutral or positive compatibilities; only one potential incompatibility was identified with regard to the amount of development proposed and the SA Objective No 10 on waste. The Key Principles have been rearranged and refined to provide clarification and this is not significant with regard to the previous SA findings that remain valid and relevant. Whilst waste is not explicitly mentioned within the Principles, new development must be supported by the necessary infrastructure (No 2) and development must achieve high quality design and layout (No 10) indicating compatibility and confirming that there are no likely adverse effects between the GCP Key Principles and the SA Objectives.
- 6.13 **Policy A1 Effective Use of Land & Buildings:** Previous policies have been merged to provide more clarity and enable updating with regard to the new NPPF requirement concerning housing density. The supporting text explains the approach taken by the City Council that it is not appropriate to set minimum densities in the City Centre in recognition of the sensitive historic context. Those sites where higher densities are more appropriate have been identified by the Council. The Policy requires that development should result in overall improvements to the built and natural environment – confirming the previous SA findings of positive effects that will be cumulative in the longer term. The seven criteria that new development must satisfy confirm the positive or at least neutral effects indicated for SA Objectives No 8 Landscape, No 6 Transport/Access, No 17 Health, Nos 19-20 Open Space, No 10 Waste and No 11 Pollution.
- 6.14 **Policy A2 Affordable Housing:** New Policy that requires 25% affordable housing on residential sites of 11 dwellings or more or sites with a maximum gross floorspace of 1000 sq m or more. The City Council will support grant aided schemes that deliver greater than 25% affordable housing, and tenure and house types, that meet the city's needs. The supporting text explains the particular need for more affordable homes in Gloucester. The previous SA had found positive effects from policies on housing. This clarification and development of a specific policy for affordable housing will strengthen the

positive effects previously found for SA Objective No 18 Housing, No 17 Health and in particular, No 16 Inequalities.

- 6.15 **Policy A3 Estate Regeneration:** New Policy to reflect a particular issue in Gloucester with several former local authority housing developments of varying age. The policy provides guidance on how the positive elements for residents and established communities should be respected and not lost during any redevelopment to improve the physical condition of the housing stock. The value of the existing assets in terms of built and natural assets is also recognised. The Policy requires regeneration of housing estates to meet with 9 criteria. The requirement for masterplanning will ensure that any potential adverse effects are mitigated, and the potential opportunities are exploited with positive effects. The requirements for active involvement from the local community and improvements in health & wellbeing will have positive effects for SA Objective No 16 Inequalities and No 17 Health. The requirement to promote strong and thriving communities will have positive effects on SA Objective Nos 12-13 Economy, No 14 City & Local Centres, Nos 19-20 Open Space, and also promote No 25 Cultural Heritage by supporting and improving existing communities. Overall, the policy will have positive effects for SA No 18 Housing – particularly through the requirements for suitable type and tenure and maintenance/promotion of independent living.
- 6.16 **Policy A4 Student Accommodation:** Additional policy text to clarify that the permanent loss of purpose-built student accommodation will only be supported where it can be demonstrated that the accommodation is surplus to current and future requirements or equivalent/better replacement is provided. This ensures that the provision of this particular type of housing is maintained according to current and future needs, providing mitigation measures against loss and confirming positive effects for SA Objective Nos 16 Inequalities, No 17 Health, and No 18 Housing.
- 6.17 **Policy A5 Specialist Housing – housing choice for older, frail and disabled people:** The policy has been reworded for clarification and additional text protects against any net loss of specialist residential floor space. This confirms the previous SA findings for positive effects for SA No 16 Inequalities and No 18 Housing.
- 6.18 **Policy A7 Self Build & Custom Build Homes:** New Policy that makes provision for a proportion of sites to be offered for sale to self and custom builders, subject to demand being identified on the Council's Register. The supporting text explains the reasoning and requirement for such provision. This policy will contribute to the overall major positive effects indicated by the previous SA findings for SA No 18 Housing and No 16 Inequalities by ensuring that the needs of this particular group of people are met.
- 6.19 **Policy B2 Safeguarding Employment Sites:** Several previous policies have been merged for clarity. The Policy sets out how existing sites will be safeguarded and change generally resisted. This confirms the previous SA findings with positive effects for SA Objective Nos 12-13 on economy and employment.



- 6.20 **Policy B3 New employment development and intensification and improvements to existing employment land:** Several previous policies have been merged for clarity. The Policy sets out five criteria that must be met for new or intensification of employment development. These requirements provide mitigation measures to ensure that any adverse effects on transport, amenity, character of location, and noise, air, water, soil or light pollution are minimised/avoided, thus indicating overall at least neutral effects. The previous SA findings with positive effects for SA Objective Nos 12-13 on economy and employment are confirmed. Employment land allocations are considered later in this section under Refining Site Allocations.
- 6.21 **Policy B4 Development within or adjacent to Gloucester Docks and Canal:** New Policy that recognises the particular qualities associated with the docks and canal. The previous SA and HRA had identified potential negative effects associated with both local and internationally designated biodiversity – the Severn Estuary SPA/SAC/Ramsar sites – and effects on changes to water quality and water levels. The initial SA and HRA had assumed that the JCS and GCP policies would provide sufficient mitigation measures and indicating a residual effect that approaches neutral. However, Natural England disagreed and were concerned about potential effects on functionally linked land, for example, Alney Island SSSI & Nature Reserve and located nearby to the north-west of the City. The development of a specific policy to ensure no adverse effects from new development within or adjacent to the Gloucester Docks and the Canal considerably strengthens the mitigation measures.
- 6.22 The new policy supports proposals that facilitate accessibility and recreational use of the historic docks, waterspace and the wider canal network with likely positive effects for SA Objective Nos 12-13 Economy/Employment, No 14 City /Local Centres, No 16 Inequalities, No 17 Health, Nos 19-20 Open Space, and No 25 Cultural Heritage. Such development will only be supported when it meets with five criteria that protect navigation/use of the waterspaces, the historic built character, local amenities, the public realm and movement routes, and facilitates the role of the waterspaces within the multifunctional green and blue infrastructure networks.
- 6.23 These 5 criteria provide specific mitigation measures to ensure that residual effects are neutral for SA Objective No 4 Water Quality, No 6 Sustainable Transport, No 8 Landscape, No 11 Amenity, No 16 Inequalities, Nos 19-20 Open Space, and No 25 Cultural Heritage. The requirement for net biodiversity gain will ensure positive effects for SA No 1 that will be synergistic and cumulative in the longer term. The Policy requires that where development could have an impact on internationally designated sites, a project level Habitats Regulations Assessment is required. This confirms that specific mitigation measures are in place to ensure that there will be no significant negative effects.
- 6.24 **Policy C5 Air Quality:** The policy has been expanded to clarify requirements and to suggest further mitigation options, including further explanation in the supporting text. The policy comprises 5 criteria that provide strong mitigation measures to reduce/minimise potential negative effects. Criterion No 1 & No 2 require a building configuration that does not inhibit effective pollution

dispersion and minimises public exposure to pollution sources through good design and layout. Criterion 3 requires the use of green infrastructure to help absorb dust and other pollutants. Criterion 4 requires transport infrastructure with low impact on air quality and criterion 5 requires control of dust and emissions from all development project phases. These criteria will contribute to approaching residual neutral effects. The policy further requires a net gain in vegetation for projects within the City's AQMA – thus contributing the help resolve an existing environmental problem with the potential for positive effects for SA No 11 Pollution and No 17 Health.

- 6.25 **Policy D2 Non-Designated Heritage Assets:** The Policy includes additional text to make explicit that proposals for demolition or total loss will be subject to a balanced assessment taking into account the significance of the asset, the scale of harm or loss, and that all reasonable steps have been taken to retain the asset, including an assessment of alternative uses. This strengthening of the policy confirms that sufficient mitigation measures are in place to protect non-designated heritage assets, confirming the previous SA findings for residual neutral effects.
- 6.26 **Policy E1 Landscape Character & Sensitivity:** The Policy has been enhanced to make explicit that trees, hedgerows and areas of green that are not otherwise protected, but which contribute to local landscape character, should where at all possible be retained and utilised. This strengthens the mitigation provided through the policy and confirms the previous SA findings; the further requirement for protection of local vegetation that is not otherwise protected will contribute overall to cumulative improvements in the longer term.
- 6.27 **Policy E2 Biodiversity & Geodiversity:** The Policy has been reworked with merging of previous drafts for clarification. There is additional reference to ecological networks; all development is required to provide net gains to the ecological network and proposals that affect local sites must secure a net gain in biodiversity (and in line with the revised NPPF and emerging new requirement<sup>104</sup>). The policy includes three new criteria for the different categories of designation from international, national through to local and it sets out explicitly the requirements from new development for each category. Criterion 1 sets out that there must be no adverse effects on the integrity of internationally designated sites – SPAs, SACs, and Ramsar. Criterion 2 specifically refers to a requirement for no wider indirect or cumulative effects on the national network of SSSIs. Criterion 3 specifically requires a net gain in biodiversity to be secured from new development. The considerable reworking of the policy is significant for both the SA and the HRA.
- 6.28 The expansion and reworking of the policy responds to concerns raised by Natural England and updates the situation with regard to the revised NPPF (paragraph 170) and emerging changes to planning policy that are likely to require net gains in biodiversity from all new development when granting planning permission. Thus, this revised Policy E2 provides interim guidance until the review of the JCS is completed and whilst recreational studies are

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<sup>104</sup> <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

ongoing, together with continuing liaison between the JCS authorities and relevant adjoining local planning authorities to further develop the strategic mitigation actions.

- 6.29 The previous SA and HRA had considered that the policy mitigation provided through the GCT JCS and the Draft GCP was sufficient to ensure that development in Gloucester will not lead to any significant negative effects on biodiversity. The HRA screening has been revised in line with recent CJEU's and an appropriate assessment undertaken. This has taken into account the comments made by Natural England and the ongoing discussions. The revised HRA Report (July 2019) accompanies the Pre-Submission GCP on Regulation 19 consultation. The expansion of the Policy E2 (together with new Policy E8 and site-specific requirements for HRA for certain site allocations) enabled the HRA to conclude that there were sufficient mitigation measures in place such that there would be no adverse effects alone or in combination on the integrity of designated sites.
- 6.30 The additional guidance and clarity provided in Policy E2 confirms the previous SA findings that there will not be any significant negative effects on biodiversity. Criterion 2c specifically requires that development should have no wider indirect or cumulative effects. The strengthening of the policy to include requirements for net gain in biodiversity will change the previous SA findings from approaching neutral towards minor positive effects. Such effects may be synergistic and cumulative in the longer term.
- 6.31 **Policy E4 Trees, Woodlands & Hedgerows:** The policy has been expanded and includes a requirement for measurable biodiversity net gain. This strengthening of the policy changes the previous SA findings from approaching neutral towards potential for minor positive effects. Such positive effects may be synergistic and cumulative since the policy also seeks opportunities for increasing the connectivity of the ecological network.
- 6.32 **Policy E6 Flooding, Sustainable Drainage & Wastewater:** The policy has been expanded for clarification and including further requirements for mitigation measures with financial contributions towards flood risk management infrastructure where appropriate. The previous SA had found that policy mitigation provided through the JCS and draft GCP should ensure that there will be no significant negative effects on flood risk, water quality or water resources (water efficiency is addressed through GCP Policy E8). The strengthening of Policy E6 confirms the previous SA findings. The requirements for new development to explore opportunities to facilitate watercourse restoration could result in positive effects for SA Objective No 1 Biodiversity, No 4 Water Quality, No 8 Landscape, and No 17 Health. Such effects could be synergistic and cumulative in the longer term.
- 6.33 **Policy E8 Development affecting the Cotswold Beechwoods SAC:** Whilst the GCP Policy E2 has been substantially updated and including wording to guide with regard to the European designated site, after further discussions with NE, the City Council has developed a new Policy that explicitly deals with the concerns regarding increased recreational pressures arising from new

development – including from other plans and projects. This is discussed in more detail in the HRA Report (July 2019).

- 6.34 Policy E8 requires that in order to retain the integrity of the SAC all development that leads to a net increase in dwellings will be required to mitigate any adverse effects of increased recreational pressure. Development proposals must contribute towards mitigation specified in the SAC mitigation and implementation strategy or through a bespoke Habitats Regulations Assessment. Development that is likely to generate road traffic emissions to air which are capable of affecting the SAC will be screened against the Habitats Regulations Assessment Framework in line with Natural England's guidance<sup>105</sup>. This additional Policy provides clear and strong mitigation measures that will ensure no adverse impacts on the integrity of the Cotswold Beechwoods SAC, alone or in-combination with other plans and projects.
- 6.35 **Policy G1 Sustainable Transport:** The policy includes new wording to make explicit that the City council strongly supports and encourages improvements to the sustainable transport network. The previous SA 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 sustainable transport. The new explicit support and encouragement for sustainable transport is likely to promote positive effects that could be synergistic and cumulative in the longer term for SA Objective No 6.
- 6.36 **Policy G2 Charging Infrastructure for Electric Vehicles:** New Policy that makes provision for charging points for residential and non-residential development. This requirement will contribute to positive effects for SA Objective No 2 and No 3 on climate change, and No 11 Pollution.
- 6.37 **Policy G3 Cycling & Policy G4 Walking:** New policies that reflect the changing concerns about climate change and the commitment from the City Council to aim for carbon neutrality by 2050. Policy G4 explains that the Council wishes to encourage comprehensive city-wide cycling initiatives in line with the County Council LTP. Development will be supported where it improves cycle routes to sustainable transport hubs; also, access improvements to the outer ring road, the canal towpath, and the A40 corridor between Gloucester and Cheltenham. Policy G5 explains that the Council will support development that protects and enhances convenient, safe and pleasant walking environments, including linking neighbourhoods and green infrastructure, and improvements for walking routes to sustainable transport hubs.
- 6.38 These new policies that specifically support and encourage cycling and walking will strengthen the findings of the previous SA with positive effects for SA Objective 2 & 3 Climate Change, No 6 Sustainable Transport, No 11 Pollution, and No 17 Health. The positive effects should be synergistic and cumulative in the longer term.

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<sup>105</sup> Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

- 6.39 **Policy G5 Broadband Connectivity:** The new policy requires all development to be served by high speed, reliable full-fibre broadband connection. This will enhance connectivity and accessibility, contributing to positive effects for people, communities and employment/economy.
- 6.40 **Policy G6 Telecommunications Infrastructure:** The new policy recognises the need for new infrastructure but that structures such as masts, aerials and satellites have implications for land use. The policy requires that such development should not have adverse impacts on the environment including heritage assets, biodiversity, local amenity, the landscape and its setting. Guidance is also provided regarding redundant installations and their removal with site reinstatement to be approved at the application stage. This provides clear mitigation measures to reduce any negative effects on SA Objective No 1 Biodiversity, No 8 Landscape, No 9 the Historic environment, and No 11 Amenity towards residual neutral effects.
- 6.41 **Policy G7 Water Efficiency:** This new policy makes explicit requirements for water efficiency by requiring development to demonstrate that the estimated consumption of wholesome water per dwelling does not exceed 110 litres per person per day. This is in recognition of the Severn Trent Water Resource Management Plan (August 2019)<sup>106</sup> that identifies Gloucester City as being in an area of high vulnerability. The supporting text also explains that improved water efficiency can provide wider benefits to the water cycle and environment. The previous SA had assumed that JCS and GCP policies would ensure that there were no significant negative effects for SA Objective No 4 Water Quality & Resources. The inclusion of this specific policy further confirms the previous SA findings and indicates residual neutral effects.
- 6.42 **Policy G8 Review Mechanism:** Where planning policies cannot be immediately met by a development, due to exceptional circumstances, a review mechanism shall be imposed to strengthen the council's ability to seek compliance with the relevant policies over the lifetime of the project. This new policy strengthens the embedded mitigation measures within development management policies and further ensures that such measures will be implemented, including in the longer-term. This strengthens the previous findings of the SA.

### **Refining Site Allocations: Implications for SA Findings**

- 6.43 The Council has further investigated the proposed site allocations that were subject to consultation in early 2017 at the Regulation 18 stage. Some sites have now gained planning permission, others are no longer suitable or available, and some new sites have become available. Table 6.2 set out the outline reasoning for the selection or progression of site options to proposed site allocations. The new sites have been subject to SA using the same SA framework of objectives as previously in the same manner, and the details are provided in the updated Appendix IV (SA of Site Options) of this SA Report.

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<sup>106</sup> <https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/>

6.44 The Site Allocations, together with site-specific requirements, proposed at the Pre-Submission stage are as follows:

**Table 6.3: Site Allocations**

Site Allocation	Site-Specific Requirements
SA01 Land at the Wheatridge Second Form Entry Primary School & approx. 10 residential dwellings	<ul style="list-style-type: none"> <li>■ Archaeological assessment</li> <li>■ Ecological surveys (bats, breeding birds, reptiles)</li> <li>■ Green Infrastructure (GI) – species rich grassland &amp; hedge improvements</li> </ul>
SA02 Land at Barnwood Manor approx. 30 residential dwellings	<ul style="list-style-type: none"> <li>■ Enhanced pedestrian permeability</li> <li>■ Built heritage &amp; archaeological assessments</li> <li>■ Ecological surveys (bats, breeding birds, otters/water voles, reptiles)</li> <li>■ Improve GI links to the Local Wildlife Sites</li> <li>■ Watercourse should be kept naturalised &amp; dark</li> <li>■ Minimum 10m green buffer strip</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
SA03 Former Prospect House, 67 – 69 London Road approx. 30 residential dwellings	<ul style="list-style-type: none"> <li>■ Archaeological assessment</li> <li>■ Retention of trees</li> <li>■ Use of green roofs/walls</li> <li>■ Creation of bat habitat; swift blocks, provision for house martins</li> </ul>
SA04 Former Wessex House, Great Western Road approx. 20 residential dwellings	<ul style="list-style-type: none"> <li>■ Potential improvements to station underpass &amp; improved pedestrian links</li> <li>■ Archaeological assessment</li> <li>■ Use of green roofs/walls</li> <li>■ Creation of bat habitat; swift blocks, provision for house martins</li> </ul>
SA05 Land at Great Western Road Sidings approx. 200 residential dwellings	<ul style="list-style-type: none"> <li>■ New strategic cycle &amp; footpath linking to city centre &amp; railway station/transport hub</li> <li>■ Children's play area, formal sports provision, public open space</li> <li>■ Improvements to station underpass</li> <li>■ Built heritage &amp; archaeological assessments</li> <li>■ Creation of green corridor following proposed walking/cycling route from Horton Rod</li> <li>■ Creation of bat habitat</li> <li>■ Invertebrates &amp; any loss of brownfield land should be mitigated through brown roofs</li> </ul>

	<ul style="list-style-type: none"> <li>■ Contribution to tree planting &amp; green space</li> <li>■ Ecological surveys (bats, breeding birds, reptiles, invertebrate habitat)</li> <li>■ Air Quality: all proposals must demonstrate compliance with EU limit values &amp; national objectives for air pollutants</li> </ul>
SA06 Blackbridge Sports and Community Hub Multi-use sports, physical activity and community hub	<ul style="list-style-type: none"> <li>■ Integrate with adjacent Gloucester Athletics Club</li> <li>■ Potential requirement for archaeological assessment</li> <li>■ Improvements to locally important wildlife area of the dismantled railway cutting</li> <li>■ Implement Sustainable Drainage Systems</li> </ul>
SA07 Lynton Fields, Land East of Waterwells Business Park B Class employment uses	<ul style="list-style-type: none"> <li>■ Archaeological assessment</li> <li>■ Enhancement of watercourse &amp; grassland</li> <li>■ Ecological surveys (bats, breeding birds, reptiles)</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
SA08 King's Quarter Mixed use/main town centre uses	<ul style="list-style-type: none"> <li>■ Enhanced pedestrian &amp; cycle links to railway &amp; bus stations</li> <li>■ Built heritage &amp; archaeological assessments</li> <li>■ Requirement for green roofs/walls</li> <li>■ Creation of bat habitat; swift blocks, provision for house martins</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
SA09 Former Quayside House, Blackfriars B1 offices, combined GP practice, pharmacy, approx. 50 residential dwellings	<ul style="list-style-type: none"> <li>■ Contribution to enhancement at Alney Island</li> <li>■ Requirement for green roofs/walls</li> <li>■ Creation of bat habitat; swift blocks, provision for house martins</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
SA10 Former Fleece Hotel/Longsmith Street Car Park Mixed use/main town centre uses & approx. 25 residential dwellings	<ul style="list-style-type: none"> <li>■ Improve pedestrian links &amp; permeability</li> <li>■ Built heritage &amp; archaeological assessments</li> <li>■ Requirement for green roofs/walls</li> <li>■ Creation of bat habitat; swift blocks, provision for house martins</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
SA11 Land rear of St Oswalds Retail Park	<ul style="list-style-type: none"> <li>■ Improve pedestrian access to Archdeacon Meadow &amp; the Severn Way</li> </ul>

<p>approx. 300 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ New public open space</li> <li>■ Neighbourhood area for children's play</li> <li>■ Archaeological assessment</li> <li>■ Retain some brownfield; create green area</li> <li>■ Ecological surveys (bats, breeding birds, reptiles)</li> <li>■ Air Quality: all proposals must demonstrate compliance with EU limit values &amp; national objectives for air pollutants</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
<p>SA12 Land at Rea Lane, Hempsted approx. 30 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Archaeological investigation</li> <li>■ Improvements to habitats with details for protection of badger, breeding birds, hedgehog, great crested newts &amp; reptiles</li> </ul>
<p>SA13 Former Colwell Youth and Community Centre approx. 20 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Built heritage assessment</li> <li>■ Requirement for green walls/roofs</li> </ul>
<p>SA14 Land off New Dawn View approx. 30 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Possibility for archaeological assessment</li> <li>■ Improvements to nearby dismantled railway cutting</li> <li>■ Ecological survey for breeding birds</li> </ul>
<p>SA15 Land south of Winnycroft allocation approx. 30 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Archaeological assessment</li> <li>■ Enhance hedgerows &amp; trees</li> <li>■ High standards of GI</li> <li>■ Ecological surveys (bats, breeding birds, reptiles)</li> </ul>
<p>SA16 Land off Lower Eastgate Street approx. 15 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Desk-based evaluation &amp; possibly trial trenching</li> <li>■ Requirement for green walls/roofs</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
<p>SA17 Land south of Triangle Park (Southern Railway Triangle) B1/B8 class employment uses</p>	<ul style="list-style-type: none"> <li>■ Archaeological assessment</li> <li>■ Contributions to GI on other side of railway; consider connectivity to SA05</li> <li>■ Creation of habitat for brownfield species</li> <li>■ Ecological surveys (bats, breeding birds, badgers, reptiles)</li> </ul>



<p>SA18 Jordan's Brook House approx. 20 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Small area of open space or contribution to improvements in local park</li> <li>■ Archaeological assessment</li> <li>■ Improve GI links in corridor through SA02 to Barnwood LWS</li> <li>■ Watercourse should be kept naturalised &amp; dark</li> <li>■ Minimum 10m green buffer strip</li> <li>■ Ecological surveys (bats, breeding birds)</li> <li>■ Provision of bat boxes, swift blocks, provision for house martins</li> </ul>
<p>SA19 Land off Myers Road approx. 10 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Contributions to improvements in open space</li> <li>■ Archaeological evaluation by trenching</li> <li>■ Improve tree or hedge planting; GI improvements should link with SA05</li> <li>■ Air Quality: all proposals must demonstrate compliance with EU limit values &amp; national objectives for air pollutants</li> </ul>
<p>SA20 White City Replacement Community Facility Replacement community facility</p>	<ul style="list-style-type: none"> <li>■ Retention of some brownfield, enhancement of trees &amp; hedges</li> <li>■ Ecological surveys (breeding birds, reptiles)</li> </ul>
<p>SA21 Part of West Quay, The Docks Mixed use/main town centre uses and approx. 20 residential dwellings</p>	<ul style="list-style-type: none"> <li>■ Built heritage &amp; archaeological assessments</li> <li>■ Requirement for green roofs/walls</li> <li>■ Creation of bat habitat; swift blocks, provision for house martins</li> <li>■ Ecological surveys (bats, breeding birds)</li> <li>■ Site-specific SFRA is any development within FZ 2 or 3; Sustainable Urban Drainage</li> </ul>
<p>SA22 Land adjacent to Secunda Way Industrial Estate 'B' class employment uses</p>	<ul style="list-style-type: none"> <li>■ Archaeological assessment</li> <li>■ Ecological surveys (bats, reptiles)</li> </ul>

6.42 The site options with indicative capacities at the time were tested through SA at early stages (March 2019) of the Pre-Submission GCP development. The SA made certain recommendations for mitigation measures to resolve potential negative effects and made suggestions for progressing opportunities for positive effects (Appendix IV). Since that time, the Council has developed site-specific requirements for each Site Allocation, and these provide mitigation/enhancement such that the SA findings have been updated. Such

site-specific requirements reduce potential negative effects towards a more neutral residual effect; they often remove uncertainty in the initial assessments and confirm the effectiveness of such mitigation measures. The SA has taken into consideration the refinements and updating to other GCP Policies and the confirmation of site-specific requirements for the Site Allocations - the summary updated findings for the SA of the sites are shown in Table 6.4, as follows:

**Table 6.4: SA of Site Allocations – Summary**

SA Objectives <sup>107, 108</sup> GCP Site Allocations (number dwellings)	Biodiversity	Water Quality	Flood Risk	Sustainable Transport_Traffic		Soil Quality	Townscape/ Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & Local Centres	Inequalities	Health	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6 <sup>109</sup>	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
<b>SA01</b> Land at the Wheatridge (10)	+	+	+	0	+	-	0?	0	0	0	+	+	++	+	+	0	+?
<b>SA02</b> (30) Land at Barnwood Manor	+	+	0	0	+	+	-	+	-	0?	0	0	+	+	+	0	+?
<b>SA03</b> 67-69 London Road (30)	+	+	+	0	+	+	+	0?	0	0	++	++	+	+	+	0	+?
<b>SA04</b> Former Wessex House (20)	+	+	+	0	+	++	+	0	0	0	+	+	+	+	+	+	+?
<b>SA05</b> Great Western R Sidings (200)	++	+	+	-?	+	+	+	0	0	0	++	+	+	++	+	+	+?
<b>SA06</b> Blackridge Sports Hub (0)	+	+	+	0	+	-	+	0	0	+?	+	+	++	0	+	+	++
<b>SA07</b> Lynton Fields (0)	++?	+	+	0	-?	-	-	0	0	++	+	+	-	+	+	+	?
<b>SA08</b> Kings Quarter	+	+	0	0	+	+	+	0?	0	+	++	++	++	+	-	+	+?
<b>SA09</b> Former Quayside House (50)	+	0	0	-?	+	++	+	0?	0	+	++	+	+	++	+	+	+?
<b>SA10</b> Former Fleece Hotel & Car Park (25)	+	0	+	0	+	++	+	0?	0	+	++	++	++	+	+	+	+?

<sup>107</sup> It is considered that all site options have the potential for minor positive effects against SA Objectives 2, 3, 10, 15, 21 and 22

<sup>108</sup> First number is reference originally used in SA and reported in Appendix IV 2016; second number is the City Plan reference used in 2019

<sup>109</sup> 6a refers to increased traffic, site access &/or effects on the highway network; 6b refers to distance from sustainable transport modes

<b>SA11</b> Rear St Oswalds Retail (300)	++?	+	0	-?	+	+	+	0	0	0	++	++	++	++	+	+	?
<b>SA12</b> Rea Lane, Hempsted (30)	+	+	+	0	+	-	-	0	0	0	-	+	-	+	+	+	?
<b>SA13</b> Former Colwell Youth Centre (20)	+	+	+	0	+	+	+	0	0	0	+	+	+	+	+	+	-?
<b>SA14</b> Land off New Dawn View (30)	+	+	+	0	+	+	+	0	0	0	+	+	+	+	+	+	?
<b>SA15</b> South of Winnycroft (30)	+	+	+	0	+	-	+	0	0	0	+	+	++	+	+	+	++
<b>SA16</b> Land off Lower Eastgate Street (15)	+	+	+	0	+	++	+	0?	0	0	++	++	++	+	-?	+	++?
<b>SA17</b> South of Triangle Park (0)	++?	+	+	0	+	+	+	0	0	++?	+	+	++?	0	+	+	?
<b>SA18</b> Jordans Brook House (20)	+	+	+	0	+	+	+	-	0	0	0	+	+	++?	+	+	+
<b>SA19</b> Land off Myer's Road (10)	+	+	+	0	+	+	+	0?	0	0	++	++	++	+	+	+	?
<b>SA20</b> White City Replacement (0)	+	+	+	0	+	++	+	0	0	0	+	+	+	0	+	+	++
<b>SA21</b> Part of West Quay, the Docks (20)	+	0	0	0	+	++	+	0	0	0	++	+	++	+	+	+	++?
<b>SA22</b> (0) Adjacent Secunda Industrial	+	+	0	0	+	-	-	0	0	+	++	+	++	0	+	+	?

- 6.45 Generally, the SA of the Site Allocations found neutral or minor positive effects for most SA Objectives. The significance reported reflects the significance thresholds set out during the updated scoping stage and as reported previously here in this SA Report within Table 2.1 that details the SA Framework. The Council has sought to progress sites where negative effects are minimised or can be readily mitigated and where opportunities for positive effects may be most sustainably achieved.
- 6.46 Three sites were found to have potential minor negative effects for SA No 6a associated with the larger sizes of the development capacity and likely increased traffic. Detailed transport studies are not available so some uncertainty of the extent of any negative effects until project level assessments undertaken. Only one site (SA07) was identified for minor negative effects on sustainable transport due to its distance from existing sustainable modes.
- 6.47 Six sites were found to have minor negative effects for loss of greenfield land which will be permanent and irreversible loss of the soil resource. However, it may be noted that the Council has carefully selected sites that do not result in the loss of best and most versatile agricultural land. Major positive effects were found for six sites that reuse brownfield/previously developed land, indicating an efficient use of land and buildings.
- 6.48 For five sites, some minor negative effects on landscape/townscape character were indicated. Minor positive effects for most other sites reflect the enhancement potential through new development and regeneration.
- 6.49 Neutral effects were indicated for sites with regard to effects on the historic environment. Many of the allocations include site-specific requirements for built heritage and/or archaeological assessments indicating that mitigation measures are in place to ensure that there are no significant negative effects. These site-specific requirements removed most uncertainties from the earlier SA of the site options for SA No 9 on the Historic Environment and confirmed effects could approach neutral; some uncertainty for a few sites until these project level studies are undertaken.
- 6.50 Only one site was found to have minor negative effects due to its distance from the City or a Local Centre. The Council has carefully selected sites that are within a reasonable walking distance of services and facilities, including access to such Centres. Two sites were found to have potential minor negative effects due to their location beyond reasonable walking distance (800 m) of an existing health/medical facility. Two sites were found to have minor negative effects due to their distance from public open space.
- 6.51 One site (SA13) was found to have potential minor negative effects for cultural heritage as development for residential use would involve the loss of the community centre. However, some uncertainty as it is understood that the site is used currently as an arts centre and it is unclear whether this could be provided elsewhere to meet local needs. For sites within easy access of the city centre, potential minor positive effects were indicated since residents could access cultural facilities; generally, some uncertainty for this SA

Objective No 25 as specific evidence not available. However, site SA13 Blackridge Sports & Community Hub was found to have likely major positive effects since sports provide people with opportunities for social interaction through which skills can be developed; culture and sports are both human rights.

- 6.52 All development sites are likely to need to demonstrate net gains in biodiversity in line with the revised NPPF and recent Government consultation<sup>110</sup>. Each Site Allocation includes requirements for site-specific ecological surveys and/or enhancements to trees/hedgerows and the green/blue infrastructure networks. These commitments to biodiversity gains changed the earlier SA findings of the site options from uncertain neutral to at least minor positive effects. Four sites were found to have potential major positive effects due to their larger capacity with more possibilities for creative design and contribution to green/blue infrastructure networks, including sustainable transport routes. Overall, the requirements for biodiversity net gains are likely to be synergistic and cumulative in the longer-term.
- 6.53 Mixed use or employment land sites were found to have minor positive effects for SA Objectives on economy/employment with major positive effects indicated for the larger sites. Similarly, with housing – mixed use or residential land sites were found to have minor positive effects for SA Objectives on housing with major positive effects indicated for the larger sites.
- 6.54 New development can contribute to reducing inequalities indicating minor positive effects for SA No 16 for all sites; certain sites (SA03, SA08, SA10, SA11, SA16 & SA19) were found to have likely major positive effects since the sites are located within more deprived areas – new development can help to resolve an existing sustainability problem.
- 6.55 Provision of good quality housing and access to sufficient employment land/jobs is associated with health and well-being. All residential and mixed-use site allocations are located within reasonable walking distance of existing health facilities indicating minor positive effects for SA No 17. Provision of, and access to, sustainable transport modes encourages a healthier lifestyle through facilitating cycling and/or walking. All residential and mixed-use site allocations are located within reasonable walking distance of sustainable transport options with at least minor positive effects indicated. Six sites were found to have likely major positive effects, either due to their closer proximity to the sustainable transport network and/or site-specific requirements to improve sustainable transport, for example SA04, SA05, SA08, SA10).
- 6.56 Most sites are within reasonable walking distance of public open space indicating likely minor positive effects. Most sites are within reasonable walking distance of educational facilities indicating minor positive effects. SA Objective No 25 is concerned with protection and enhancement of cultural heritage and for 8 sites the SA recorded uncertainty as there is insufficient evidence to make a reasonable judgment. However, the SA assumed that for many of the other sites within or in easy access of the city centre, there was

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<sup>110</sup> <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

good access to cultural heritage facilities indicating likely minor positive effects, but some uncertainty retained. Only one site (SA13) was found to have potential minor negative effects as this is currently used as an arts centre and at this stage, it is not clear if the centre would be lost or replaced elsewhere.

### **SA of Implementing the Pre-Submission Gloucester City Plan (GCP)**

- 6.57 The further development and updating of the GCP generally confirms the previous SA findings. The substantial reworking of Policy E2 Biodiversity & Geodiversity, together with the new Policy E8 Development affecting the Cotswold Beechwoods SAC, provides updating and considerable strengthening of policies to provide stronger mitigation measures in respect of biodiversity, in particular the European designated sites, and sustainable water management - removing uncertainty from the previous SA and confirming at least neutral effects. The refinement of other Policies provides clarification and further guidance. The confirmation of the proposed Site Allocations, together with site-specific requirements where necessary - provide specific mitigation measures to reduce potential negative effects and confirm possible positive effects.
- 6.58 **Housing:** Policies on housing – A1-A6 – continue to support and guide housing development with associated positive effects. New Policy A2 Affordable Housing clarifies the particular needs for Gloucester and provides strong guidance to ensure that such needs are met. New Policy A6 updates the requirement for self-build and custom-build homes. Policy A4 Student Accommodation safeguards the needs of these residents, and Policy A5 Specialist Housing has been enhanced. Overall, the housing policies will have major positive effects to benefit all groups and members of the community. The further refinement with confirmed proposed Site Allocations is likely to have positive effects in both the shorter and longer-terms through meeting the remaining identified housing needs in the Borough area. Provision of good quality housing will also have positive effects on health and well-being.
- 6.59 **Economy & Employment:** GCP Policies B1-B5 safeguard and support employment land; Site Allocations SA06-SA10, SA17 and SA22 provide for employment land either alone or within mixed-use developments. Policy B3 now also includes consideration of intensification/improvements to existing employment land and Policy B5 Culture & Tourism continues to address these important elements for Gloucester. New Policy B4 Development within and adjacent to Gloucester Docks & Canal is significant as it considers the potential opportunities that could arise whilst ensuring that the historic and natural environment are protected and enhanced – thus making clear the inter-relationships between the economic, social and environmental factors. Overall, the policies and site allocations will have major positive effects in the short and long term on the economy and employment.
- 6.60 **Health & Equalities:** Provision of land for housing and employment will contribute to positive effects for SA objectives for communities/population, health and reducing inequalities. Policies C1-C8 Healthy Communities, Policies F1-F6 Design, and Policies G1-G8 continue to support and encourage

healthy and safe lifestyles with reduced inequalities. Six Site Allocations are located in deprived areas and new development will contribute towards resolving such existing sustainability problems with positive effects. All residential Site Allocations are located within reasonable walking access of sustainable transport options; Policies G4 Cycling and G5 Walking will further encourage use, and several Site Allocations have site-specific requirements to enhance the networks. Physical activities are known to have positive mental and physical benefits for health and well-being.

- 6.61 The importance of the natural environment to health continues to be recognised with Policy E1 Landscape, E2 Biodiversity, E4 Trees, Woodlands & Hedgerows, and E5 Green Infrastructure all contributing to safeguarding and enhancement of natural resources with positive effects or well-being. Certain policies are specifically concerned with protection of health – C3 Open Space, Playing Fields & Sports Facilities, C5 Air Quality, C6 Cordon Sanitaire, C7 Fall prevention from taller buildings, E6 Flooding, and F3 community Safety. All these will contribute to positive effects that will be cumulative in the longer term.
- 6.62 **Transport & Accessibility; Air Quality:** All the proposed Site Allocations have the potential to result in an increase in traffic and an increase in emissions. However, they have been selected to minimise the need to travel and promote more sustainable transport, where possible, including site-specific requirements where necessary. Policies G4 and G5 specifically support and encourage sustainable transport. Policy A5 air Quality requires that major development should not exceed EU limit values and should achieve national objectives for air pollutants. Particular mitigation measures are required for development within the City's AQMAs and in close proximity to sensitive receptors such as schools and hospitals. Site allocations SA05, SA11 & SA19 include site-specific requirements to demonstrate that they meet with these standards. Therefore, overall, there will be no significant negative effects from the implementation of the GCP and there are mechanisms in place that indicate minor positive effects that could be synergistic and cumulative in the longer term.
- 6.63 **Climate Change:** Policies such as E6 Flooding, and G3 & G4 on cycling and walking reflect the importance that the Council places on helping to address climate change and recognises the commitment<sup>111</sup> made by the Council aiming for carbon neutrality by 2050. Overall, this is likely to have positive effects that will be cumulative in the longer term.
- 6.64 **Water Resources, Water Quality & Flood Risk:** GCP Policy E6 Flooding, Sustainable Drainage, Watercourses & Wastewater has been expanded. The strengthening of Policy E6 confirms the previous SA findings and together with other policies, including site-specific requirements for Site Allocations SA02, SA06, SA07, SA08, SA09, SA10, SA11 & SA21, confirms that there will be no significant negative effects for flooding, water quality or water resources. The requirement in Policy E6 to facilitate watercourse restoration and site-specific requirements will contribute to enhancements and help resolve existing

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<sup>111</sup> <https://www.gloucesterbid.uk/news/gloucester-city-council-declares-climate-emergency/>



sustainability problems – all with likely positive effects that will be synergistic and cumulative in the longer term.

- 6.65 **Landscape & Townscape:** GCP Policy E1 Landscape Character & Sensitivity, together with F1 Materials & Finishes, F2 Landscape & Planting and E2-E5 Green Infrastructure continue to protect and provide guidance on landscape and townscape. Further guidance is provided in site-specific requirements for the Site Allocations. This confirms the previous SA findings that the policy mitigation provided through the GCT JCS and the 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 positive effects that will be cumulative in the longer term.
- 6.66 **Biodiversity:** As discussed previously, the GCP Policy E2 Biodiversity & Geodiversity has been substantially rewritten in developing the Plan to Pre-Submission. This includes consideration of advice and comments from Natural England. It also incorporates the revision to the NPPF (2018)<sup>112</sup> with regard to environmental gain (paragraph 170) and the proposals (2019) to make biodiversity net gain necessary for developments when granting planning permission<sup>113</sup>. Thus, all development is likely to have at least minor positive effects on biodiversity; some Site Allocations were found to have likely major positive effects due to the benefits that they can provide. Overall, the GCP is proactively encouraging biodiversity improvements that have positive effects for wildlife, the wider environment and people that will be synergistic and cumulative, and helping to resolve existing sustainability problems.
- 6.67 **Soil:** 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. The GCP provides further local policy guidance. GCP Policy B3 requires that employment development should not result in unacceptable impacts on soil. The Site Allocations have been selected to avoid the best and most versatile agricultural land where possible; six sites re-use brownfield land indicating major positive effects for avoiding greenfield and loss of the soils resource. Seven sites do include use of greenfield land and these will result in the loss of the soils resource that will be permanent with minor negative effects. Overall, a mix of positive and negative effects – with mostly positive through the careful selection of sites.
- 6.68 **Cultural Heritage & Historic Environment:** GCP Policies D1-D5 continue to safeguard and encourage enhancement of the historic environment. Site-specific requirements for certain Site Allocations provide mitigation measures, such as requirements for archaeological assessments, that remove some of the uncertainties in the earlier SA work and confirming that mechanisms are in place to ensure that there are no significant negative effects. Some uncertainty of the type and effectiveness of mitigation remains for some sites until project level studies have been completed. Overall, the policy mitigation provided through the GCT JCS and the Draft GCP is considered sufficient to

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<sup>112</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>113</sup> <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

ensure that development will not lead to any significant negative effects on the historic environment and cultural heritage. Evidence was not available to support judgments on cultural heritage effects; however, it was assumed that the Site Allocations within easy access of facilities in the City Centre would have minor positive effects as such facilities are likely to be supported.

- 6.69 **Interrelationships and Cumulative Effects:** The provision of good quality housing to suit a range of identified needs and employment land to protect local jobs are likely to have positive effects on health/wellbeing. Protection and enhancement of services and facilities will support healthy communities with the potential for synergistic positive effects. Promoting more sustainable transport will further encourage more healthy lifestyles with positive effects. The commitment to adapting to climate change strongly illustrates the inter-relationships between sustainability factors and the role that the GCP can have through controlling and guiding development.
- 6.70 There had been some concern about the cumulative effects of new development on the internationally designated sites, Cotswold Beechwoods SAC & Severn Estuary SAC/SPA/Ramsar, particularly with regard to increased recreational pressures in-combination with other new development planned in nearby local authority areas. However, mitigation measures have been strengthened through embedded policies and continuing discussions with other planning authorities and Natural England. The new requirements for biodiversity gain and encouraged through certain site-specific requirements, will have synergistic and cumulative positive effects in the longer-term – with benefits for wildlife and people – for nationally and local biodiversity and green infrastructure.
- 6.71 The GCP has also made a strong commitment to encouraging sustainable transport with positive effects not only for adapting to climate change but with positive effects for health/well-being for people and wildlife through new policies on cycling and walking. Sustainable transport networks can provide important linkages for biodiversity and can comprise valuable multifunctional green infrastructure – all with positive inter-related effects that will be synergistic and cumulative in the longer term.
- 6.72 The quantum of new local developments could give rise to cumulative negative effects on townscape/landscape; however, Site Allocations have been selected to minimise such effects through careful location, constraints of size, and site-specific requirements where particular issues have been identified. Therefore, there will be townscape/landscape change, but embedded policy mitigation will reduce the potential effects and may deliver positive effects, for example through regeneration opportunities in the City Centre.
- 6.73 Overall, the GCPP is likely to deliver positive effects for SA objectives on housing, employment and communities. Potential negative effects have been mitigated through careful selection of Site Allocations to avoid significant effects and requirements for new development as set out in JCS and GCP Policies.

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

- 6.74 An EqIA is a tool which seeks to improve the work of the Council and ensure that it meets 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.
- 6.75 Inequality can exist in a number of forms and with regard to land use planning, this could 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.
- 6.76 Assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the Sustainability Appraisal process. All aspects of the developing GCP have been appraised against the SA framework including several SA objectives that directly and indirectly address equality, health and diversity, as follows: 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 this EqIA have been integrated into the SA of the GCP and are provided separately as Appendix V to this SA Report.
- 6.77 The screening assessment undertaken of the emerging draft GCP in 2016 and updated in 2019 has found that the 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)**

- 6.78 The Conservation of Habitats and Species Regulations 2017 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites<sup>114</sup>.
- 6.79 The initial screening in 2016 had found that although some designated 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. However, Natural England was concerned that the mitigation strategy work and recreational studies associated with the JCS had not progress sufficiently to enable such a conclusion. The HRA screening was revised to align with changes in the process that had arisen through recent CJEUs and an appropriate assessment was undertaken in 2019.

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<sup>114</sup> These include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

- 6.80 The GCP Policies, including those with employment, housing and mixed-use development Site Allocations, were screened for Likely Significant Effects (LSEs). It was identified that there was uncertainty of effects on designated sites, as follows:
- Cotswold Beechwoods SAC as a result of changes to air quality and increased recreational disturbance
  - Severn Estuary SAC/SPA/Ramsar as a result of changes to air quality, increased recreational disturbance, changes to water levels and quality, and loss or fragmentation of supporting habitat
  - Walmore Common SPA as a result of changes to air quality, increased recreational disturbance, and changes to water levels and quality
- 6.81 Whilst the boundary of the Severn Estuary SAC/SPA/Ramsar designated sites is outside the Gloucester City boundary, the whole of the Plan area is within the catchment of the designated area with the potential for effects on water quality and water levels. None of the Site Allocations involve land take of any designated sites and therefore, there are no likely significant effects for loss or fragmentation of habitats.
- 6.82 The City Council has taken a precautionary approach and developed a new GCP Policy E8 Development affecting Cotswold Beechwoods SAC that requires that all development in the City that leads to a net increase in dwellings should identify any potential effects and provide appropriate mitigation. The City Council has also further developed Policy E2 Biodiversity that requires new development to demonstrate that there are no adverse effects – alone or in-combination – on the integrity of internationally designated sites. The supporting text to GCP E2 further explains and guides with regard to potential adverse effects on functionally linked land and water for the Severn Estuary SAC/PA/Ramsar.
- 6.83 Overall, it was concluded that the Gloucester City Plan will not have adverse effects, alone or in-combination, on the identified European Sites. The JCS authorities are committed to an early review of the JCS; the Stroud Local Plan Review is ongoing, and the four authorities will continue to liaise under Duty to Cooperate requirements as the Review Plans progress. They will further be informed by monitoring undertaken for the Local Plans and their accompanying Sustainability Appraisals and HRAs. The authorities continue to collaborate with each other in respect of recreational surveys/studies and developing further strategic mitigation measures for any increased recreational disturbance at the Cotswold Beechwoods SAC and the Severn Estuary SAC/SPA/Ramsar.

## 7.0 Proposed Monitoring

### Introduction

- 7.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>115</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Gloucester City Monitoring Report (produced annually) alongside the monitoring framework provided in the GCT JCS is considered sufficient to ensure appropriate monitoring takes place

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<sup>115</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

## 8.0 Consultation and Next Steps

- 8.1 The Pre-Submission GCP and its accompanying SA documents are provided for Regulation 19 consultation through the Council's website. Comments made will be submitted alongside the proposed GCP and its supporting evidence documents to the Secretary of State for independent examination.
- 8.2 The Gloucester City Plan and this accompanying Sustainability (Integrated) Appraisal Report will be available for consultation for a period of approximately 6 weeks during the autumn of 2019.

The documents are available to download from the City Council's website at <https://gloucester.inconsult.uk/consult.ti/draftgloscityplan/consultationHome>



**GLOUCESTER CITY PLAN  
2011-2031**

**SUSTAINABILITY (INTEGRATED)  
APPRAISAL**

**(incorporating Strategic Environmental  
Assessment, Health Impact Assessment,  
Equality Impact Assessment)**

**NON-TECHNICAL SUMMARY**

**July 2019**

## 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 SA Report that accompanies the Draft GCP for public consultation in 2019. 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) that 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, including the 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 identifies strategic allocations around Gloucester to meet the residual need. Strategic allocations in the GCT JCS are at Policy A1 Innsworth and Twigworth, Policy A2 South Churchdown, Policy A3 North Brockworth, and Policy A6 Winnycroft.
4. The GCP allocates local sites and includes local policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031. The GCP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability Appraisal, and consultation with the public, stakeholders and the regulators.
5. The overall aspiration for the GCP is set out in the Vision and Key Principles. The GCP then comprises of themed sections with Local Policies as follows:

Housing (Policies A1-A10)

Employment Development, culture & Tourism (Policies B1-B6)



Healthy Communities (Policies C1-C8)  
Historic Environment (Policies D1-D5)  
Natural Environment (Policies E1-E8)  
Design (Policies F1-F6)  
Sustainable Living, Transport & Infrastructure (G1-G8)  
Monitoring Framework

6. Site Allocations SA01-SA22 provide for local development – mixed use, housing and employment. Overall, the Policies will guide the planning and management of growth and development in the Gloucester City area to accommodate the identified new housing and jobs whilst protecting important and valued environmental assets, including the historic heritage.

### **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 the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises<sup>1</sup> that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
8. For the SA of the GCP, an integrated process has been undertaken that also addresses health and equality issues (to demonstrate compliance with the Equality Act, 2010), alongside the requirements of the Habitats Regulations Assessment (HRA). The summary findings of the health, equality 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. Gloucester City Council commissioned independent specialist consultants, Enfusion, to progress the appraisal work in June 2016.
9. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA. 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 a SA Framework of objectives for sustainable development in the Gloucester City area, and which forms the basis against which the Draft GCP is assessed.

### **Sustainability Characteristics of the Gloucester City Area**

10. Gloucester City is characterised by its<sup>1</sup> 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.
12. Without the Gloucester City Plan to guide new development, pressures on important townscape, heritage and biodiversity assets may cause adverse effects. Housing and employment would not be located in the most sustainable locations with accessibility to transport and community services and facilities.

### Key Sustainability Issues, Problems and Opportunities

13. 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?

14. The proposed scope of the Sustainability Appraisal was set out in the SA Scoping Report, including details of how the emerging plan would be assessed. A 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 identified for development planning in the GCP area. This SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

No.	SA Objective
1	Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest <i>Relevant JCS SA Objective: 1</i>
2	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources <i>Relevant JCS SA Objective: 2, 6</i>
3	Improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change. <i>Relevant JCS SA Objective: 3</i>
4	Reduce water use and conserve and improve the quality of water bodies in the Plan area

	<i>Relevant JCS SA Objective: 5, 6</i>
<b>5</b>	Protect floodplain from development likely to exacerbate flooding problems from all sources <i>Relevant JCS SA Objective: 4</i>
<b>6</b>	Reduce the need to travel and maximise the use of sustainable modes of transport <i>Relevant JCS SA Objective: 8</i>
<b>7</b>	Improve soil quality <i>Relevant JCS SA Objective: 5</i>
<b>8</b>	Protect and enhance landscape character <i>Relevant JCS SA Objective: 5</i>
<b>9</b>	Protect and enhance the distinctive townscape quality and historic heritage and its setting. <i>Relevant JCS SA Objective: 5, 7</i>
<b>10</b>	Minimise the volume of waste created and promote the waste hierarchy (reduce, reuse, recycle) <i>Relevant JCS SA Objective: 9</i>
<b>11</b>	Improve air quality, reduce noise and light pollution and reduce the amount of contaminated land <i>Relevant JCS SA Objective: 5, 6, 9</i>
<b>12</b>	Ensure the availability of employment land and premises to secure future prosperity potential <i>Relevant JCS SA Objective: 10</i>
<b>13</b>	Support the economy by helping new and existing businesses to fulfil their potential <i>Relevant JCS SA Objective: 10</i>
<b>14</b>	Support the vitality and viability of the city centre as a retail, service, leisure and learning destination and local centres that support local needs. <i>Relevant JCS SA Objective: 11</i>
<b>15</b>	Integrate sustainable construction principles and standards into all development schemes <i>Relevant JCS SA Objective: 2, 3</i>
<b>16</b>	Reduce inequalities in wellbeing and opportunity <i>Relevant JCS SA Objective: 12</i>
<b>17</b>	Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities <i>Relevant JCS SA Objective: 14</i>
<b>18</b>	Ensure the availability of housing land and premises including affordable housing to meet local need <i>Relevant JCS SA Objective: 15</i>
<b>19</b>	Minimise development on open space and green spaces <i>Relevant JCS SA Objective: 16</i>
<b>20</b>	Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations <i>Relevant JCS SA Objective: 16</i>
<b>21</b>	Reduce crime and the fear of crime <i>Relevant JCS SA Objective: 13</i>
<b>22</b>	Encourage everyone to participate in local decision making <i>Relevant JCS SA Objective: N/A</i>
<b>24</b>	Support the development of accessible education, skills and learning, to meet the needs of both employers and the working population <i>Relevant JCS SA Objective: 17</i>
<b>25</b>	Protect and enhance the cultural heritage and offering of individual settlements <i>Relevant JCS SA Objective: 18</i>

15. 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 GCP were assessed. The SA considered positive, negative and cumulative effects according to categories of significance as set out in the following table:

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

16. The SA made suggestions to the plan-making team for mitigating any significant negative effects identified, where possible, and any possibilities for enhancement, where relevant. SA is informed by the best available information and data. However, data gaps and uncertainties may 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?**

17. Various options for accommodating proposed growth and development in the Gloucester, Cheltenham and Tewkesbury local authority areas were considered for the Joint Core Strategy and have been variously subject to SA/SEA and wide consultation. This included strategic options for the amount and distribution of development, and the potential strategic site allocations for the JCS and including the Gloucester City area. Thus, the GCP (as a Local Plan that is in conformity with the JCS) is limited in the extent of options that are meaningful and proportionate. The GCP investigated potential options for local site allocations in the emerging draft Plan, and the SA tested those options that were considered to be reasonable alternatives.

18. The Initial Draft GCP with draft Development Management Policies and potential site options (January 2017) recognised that options were limited for allocating employment and residential development land. The Council used a Sites Assessment Method to investigate potential site options and the SA tested all those options that were considered to be reasonable alternatives (suitable and deliverable). Whilst 620 new homes will be delivered through the Winneycroft Strategic Allocation south of Matson estate in Gloucester and 4,520 through the Strategic Allocations in Tewkesbury Borough allocated to meet Gloucester's housing need, there is still a shortfall in provision for Gloucester in the latter years of the JCS timeframe. All reasonable options (suitable and deliverable) have progressed as Site Allocations into the Draft GCP. The reasoning for progressing certain sites is outlined in the main SA Report.

**What are the likely significant effects of the Pre-Submission GCP?  
How has the SA influenced the GCP?**

19. Overall, the implementation of the policies presented in the GCP were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from technical studies, the wider evidence base, the SA 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 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 Local Centres
  - Long term protection against flood risk and sustainable water management
  - Landscape/townscape, biodiversity and the historic environment 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
  - Positive effects in the longer term through strong commitment to adapting to climate change, including encouraging sustainable transport and requiring biodiversity net gain
20. 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
- Loss of greenfield land with its' soils resource
- Cumulative effects on townscape/landscape
- Potential cumulative effects arising from increased recreational pressures on the internationally designated sites at the Cotswold Beechwoods and the Severn Estuary

### **How could negative effects be mitigated?**

21. A key function of the SA process is to provide advice and recommendations 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 included suggestions for site-specific requirements that could provide mitigation measures for the developing Site Allocations.
22. Potential negative effects have been mitigated through strong policies that protect the natural environment and promote sustainable communities through requirements for appropriate provision of supporting infrastructure, such as transport. 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 GCP will be mitigated through the requirement for demonstrable net gain in biodiversity for all new development. The internationally designated sites are protected through strong policies GCP E2 & E8, and continuing discussions with Natural England and nearby local planning authorities.

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

23. The screening assessment has found that the 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. Overall, effects were compatible and positive, or not applicable, with regard to protected persons; no negative effects were identified.

### **Habitats Regulation Assessment (HRA)**

24. The HRA screening assessment of the GCP was carried out to determine if the emerging policies and potential site allocations have the potential for likely significant effects on any European sites. The HRA considered the likely effects on air quality, disturbance, changes in water levels or quality, and habitat loss or fragmentation. The screening found that the development proposed in the GCP could have effects associated with disturbance and changes to water levels and water quality. These issues were investigated further through appropriate assessment and, taking into account the locations/size for relevant site allocations and the mitigation measures provided through JCS &

GCP Policies, it was considered that the GCP will not result in loss of the integrity of designated sites, alone or in-combination with other plans and projects.

### **Were there any difficulties encountered?**

25. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment.

### **Consultation**

26. The proposed scope of the SA was consulted formally at the scoping stage IN 2012 with the statutory bodies (English Heritage, Environment Agency, and Natural England) and through the Council's website for wider consultation with stakeholders and the public.
27. Consultation is a vital ongoing and iterative element of both the plan-making and the SA processes. The initial draft GCP and its accompanying SA documents were provided for consultation through the Council's website in early 2017. Comments made and responses have been recorded and taken into account in the further revision of the Plan to Pre-Submission which is published for consultation with its accompanying SA Report during the autumn 2019.

### **Monitoring Proposals**

28. 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.
29. 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.



## Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive<sup>1</sup> (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)<sup>2</sup>. 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 (July 2019) – and in accordance with paragraph 32 of the National Planning Policy Framework (revised 2018)<sup>3</sup>.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out an outline of the vision and main objectives of Draft Gloucester City Plan
	Section 3 Context & Baseline	Summarises the relationship with other relevant plans and the implications for the Draft Gloucester City Plan (GCP).
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the GCP area, and likely evolution without the Plan.
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised by sustainability theme
<i>Any existing environmental problems which are relevant to the plan including, in particular, those in relation to any areas of a particular environmental</i>	Section 3 Context & Baseline; Table 3.1	Discusses environmental/sustainability issues including any problems identified; issues summarised in Table 3.1.

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

<sup>2</sup> <http://www.legislation.gov.uk/ukSI/2004/1633/contents/made>

<sup>3</sup> <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>importance</i>		
<i>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</i>	Section 2 IA Methods Section 3 Context & Baseline Tables 2.1 & 2.2	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 with thresholds set out in Table 2.1 with significance categories provided in Table 2.2.
<i>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</i>	Section 2 Methods	Sustainability topics include suggested environmental topics – detailed in Table 2.1.
	Section 5 & Section 6 Assessments  Appendix III, IV & V	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.
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Section 5 & Section 6 Assessments Appendices III, IV & V	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are provided in Sections 5 & 6 of the SA Report and detailed in the appraisal matrices (appendices).

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>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</i>	Sections 4, 5, 6  Table 5.1 & 6.2	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 (2016), and subsequently in Table 6.2 (2019).
	Sections 2 & 3 Methods & Context, Baseline	Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.
<i>A description of the measures envisaged concerning monitoring</i>	Section 7	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Draft GCP.
<i>A non-technical summary of the information provided under the above headings</i>	Report preface (available separately)	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
<b>Environmental</b>		
Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest	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.
<b>Economic</b>		
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).
<b>Social</b>		
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	++

<b>19</b>	Minimise development on open space and green spaces	++
<b>20</b>	Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations	++
<b>21</b>	Reduce crime and the fear of crime	+
<b>22</b>	Encourage everyone to participate in local decision making	+
<b>24</b>	Support the development of accessible education, skills and learning, to meet the needs of both employers and the working population	++
<b>25</b>	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 <sup>st</sup> 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	
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.																									
<b>11.</b> 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
<b>12.</b> 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	
<b>13.</b> 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	
<b>14.</b> 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><b>Summary:</b> 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><b>SA Recommendations:</b> The Principles could be enhanced by including wording that seeks to minimise waste generation and promotes the waste hierarchy.</p>																									

## Sustainability (Integrated) Appraisal Appendix IV: SA of Site Options

The development of the SA Framework of 25 SA Objectives is explained in detail in section 2 of the Integrated Appraisal Report (October 2016 & July 2019). The SA Framework builds upon earlier SA work done by the Council in 2013; it also demonstrates alignment with the SA Framework for the JCS. It is considered that all site options have the potential for minor positive effects against SA Objectives 2, 3, 10, 15, 21 and 22; the explanations are detailed in Table 2.1 of the main IA Report.

### 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 & improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
+?	For example, an option could have the potential for a minor positive effect against SA Objective 1 (Biodiversity) through improvements to habitats; however, also an element of uncertainty as the precise nature and scale is unknown 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.

Options for site allocation were appraised and reported in Appendix IV of the IA Report (October 2016) accompanying the draft GCP on Regulation 18 consultation. Since that time, certain sites have had planning permission granted or there is uncertainty now about availability or suitability; a number of further site options have become available.

In March 2019, the SAs of the sites that are still proposed for allocation were updated, and the new site options were subject to SA in the same way using the same SA Framework.

<b>Site: Kings Quarter Bus Station and Market Parade</b> <b>Size &amp; Approx. Capacity:</b> 2.2ha, 0.5ha employment land & 50 dwellings (2016) & increased to 4.5 ha with 156 dwellings & now includes residential capacity from 104 Northgate Street (2019) <b>Site Ref:</b> 1; SALA HA02 (progressed as SA15 Kings Quarter in 2016 & retained as <b>SA08 Kings Quarter</b> in 2019)																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
SA 2016	+	+	-?	0	+	+	-?	0	+	++	++	++	+	-	+	?
SA 2019	+	+	0	0	+	+	-?	0	+	++	++	++	+	-	+	+

**Sustainability Appraisal (2016):**

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 railway 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. Previous use is/was not industrial so contamination is not likely to be an issue, but it is recognised that there will be a need for further investigation.

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 in a sensitive heritage setting and contains a Scheduled Monument (Glevum Roman colonia<sup>1</sup>). The site lies wholly within an Area of Principal Archaeological Interest, and partially within the City Centre Conservation Area. There are also Listed Buildings within and 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.

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<sup>1</sup> <https://magic.defra.gov.uk/MagicMap.aspx> [accessed March 2019]

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25); however, due to the proximity of the site to cultural facilities in the city Centre, it is considered that there could be minor positive effects but with some uncertainty.

**Update (2019):**

New bus station building work progressed through 2017- 2018, including archaeological studies that identified Roman finds; opened October 2018<sup>2</sup>. Part of Kings Quarter project, including plans submitted for Kings Square in December 2018<sup>3</sup>. Kings Quarter reassessed and capacity increased from 50 to 80 dwellings<sup>4</sup>. It may be noted that 104 Northgate Street is part of Kings Quarter but is retained as a separate site with its own residential capacity for SALA purposes.

SFRA 2<sup>5</sup> reports that the site is largely not at risk of flooding with 72% within Flood Zone FZ1; only 11% of the site is within FZ3 and development should be avoided in this part of the site. This further information and indication of mitigation by avoidance changes the SA findings from minor negative to neutral.

**SA Recommendations:**

- Consider including requirement for ecological studies to identify opportunities for biodiversity gain on this brownfield site and to promote aims of the JCS GI Strategy
- Development should avoid the FZ3 area; SUDS can be used to attenuate surfacewater as suggested by the SRFA2 and opportunities for integrating with biodiversity gain could be investigated
- Historic environment and townscape studies to ensure that the settings of the Scheduled Monument and nearby Listed Buildings are protected and enhanced where possible
- Archaeological studies required to investigate significant Roman and other interest in the area
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<sup>2</sup> <https://www.gloucester.gov.uk/about-the-council/news/latest-news/gloucester-s-new-bus-station-set-to-open-its-doors/>

<sup>3</sup> <https://www.gloucester.gov.uk/about-the-council/news/latest-news/plans-submitted-for-kings-square-transformation/>

<sup>4</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>5</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<b>Site: Former Quayside - Greater Blackfriars</b>																	
<b>Size &amp; Approx. Capacity:</b> Part of the Greater Blackfriars Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)																	
<b>Site Ref:</b> 2; SALA HA17 (progressed as SA16 Greater Blackfriars in 2016 & retained as <b>SA09 Greater Blackfriars</b> in 2019 for 50 dwellings)																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2016	0?	0?	0?	-	+	++	+	0?	0	+	++	++	++	+	+	+	?
SA 2019	0?	0	0	-?	+	++	+	0?	0	+	++	++	++	+	+	+	+?
<b>Sustainability Appraisal (2016):</b>																	
<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 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 affect 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</p>																	



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 metres 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); however, the central location within the City Centre and historic docks area suggests that residents might use nearby cultural facilities with potential positive effects, some uncertainty at this stage.

**Update 2019:**

The HRA identified that this site is within 200m of the s River Severn/Gloucester & Sharpness Canal that is connected to the River Severn and its wetlands; also, near to the River Severn and the Alney Island Local Nature Reserve (LNR) – that may be important functionally linked land for certain bird species such as the curlew and for which the Severn Estuary SPA/SAC/Ramsar are designated.

SFRA 2<sup>6</sup> reports that the site is largely not at risk of flooding with 63.5% within Flood Zone FZ1; some 36.5% is in FZ2/FZ3 and development should be avoided in these parts of the site. Discussions about remediation/flood defences are ongoing with EA, landowners and developers<sup>7</sup>. This further information and indication of mitigation by avoidance confirms the SA findings of likely neutral effects.

**SA Recommendations:**

- Include requirement for ecological studies to identify opportunities for biodiversity gain on this brownfield site and to promote aims of the JCS GI Strategy
- Consider whether embedded policy mitigation is sufficient or whether any requirement for project level HRA
- Development should avoid the FZ3 area; SUDS can be used to attenuate surfacewater as suggested by the SRFA2 and opportunities for integrating with biodiversity gain could be investigated
- Historic environment and townscape studies to ensure that the Scheduled Monuments, Listed Buildings and their settings are protected and enhanced where possible; and in line with design requirements for the Conservation Area
- Archaeological studies required to investigate significant interest in area

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<sup>6</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<sup>7</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<b>Site: Gloucester Prison (Greater Blackfriars)</b>																	
<b>Size &amp; Approx. Capacity:</b> Part of the Greater Blackfriars Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)																	
<b>Site Ref:</b> 3; Masterplan/LDO with planning permission April 2017; application for 200 student flats at the Prison																	
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	
<b>SA Summary</b>	0?	0?	-	-	+	++	+	- ?	0	+	++	++	++	+	+	+	?
<b>Sustainability Appraisal (2016):</b>																	
<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 004E), 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 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.</p>																	

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).

**Update 2019:**

Planning permission granted April 2017 including around 200 student flats proposed at the Prison.

<b>Site: Ladybellegate Street Car Park (Greater Blackfriars)</b>																
<b>Size &amp; Approx. Capacity:</b> Part of the Greater Blackfriars Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)																
<b>Site Ref:</b> 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
<b>SA Summary</b>	+	0	+	-	+	+	- ?	0	+	++	++	++	+	+	+	?
<b>Sustainability Appraisal (2016):</b>																
<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>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.</p>																
<p>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.</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 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.</p>																

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).

**Update 2019:**

None

<b>Site: Longsmith Street Car Park (Greater Blackfriars)</b>																
<b>Size &amp; Approx. Capacity:</b> Part of the Greater Blackfriars Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment) 50 dwellings																
<b>Site Ref:</b> 5; SALA HA17 (progressed as part of SA16 Greater Blackfriars in 2016 & retained as <b>SA10 Former Fleece Hotel &amp; Longsmith Street Carpark</b> in 2019 for approx. 25 dwellings)																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
SA 2016	+	0	+	-	+	+	-?	0	+	++	++	++	+	+	+	?
SA 2019	+	0	+	-	+	++	+	-?	0	+	++	++	+	+	+	+

**Sustainability Appraisal 2016:**

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); however, the central location within the City Centre and historic docks area suggests that residents might use nearby cultural facilities with potential positive effects, some uncertainty at this stage.

**Update 2019:**

The former Fleece Hotel is included in an adopted concept Statement (February 2012)<sup>8</sup> and is part of the comprehensive redevelopment of the Greater Blackfriars area. It is now included as part of GCP SA10 together with the Longsmith Street Carpark for mixed use with residential capacity of 25 new dwellings.

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<sup>8</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>



<b>Site: The Fleece (Greater Blackfriars)</b>																
<b>Size &amp; Approx. Capacity:</b> Part of the Greater Blackfriars Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment) 50 dwellings																
<b>Site Ref:</b> 6; SALA HA17 (progressed as part of SA16 Greater Blackfriars in 2016 & retained as <b>SA10 Former Fleece Hotel &amp; Longsmith Street Carpark</b> in 2019)																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & 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
SA 2016	+	0	+	- +	++	+	-?	-?	+	++	++	++	+	+	+	?
<b>Sustainability Appraisal 2016:</b>																
<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 004F), 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, 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.</p> <p>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.</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 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.</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 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); however, the central location within the City Centre and historic docks area suggests that residents might use nearby cultural facilities with potential positive effects, some uncertainty at this stage.

**Update 2019:**

The former Fleece Hotel is included in an adopted concept Statement (February 2012)<sup>9</sup> and is part of the comprehensive redevelopment of the Greater Blackfriars area. It is now included as part of GCP SA10 together with the Longsmith Street Carpark.

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<sup>9</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<b>Site: Southgate Moorings (Greater Blackfriars)</b>																	
<b>Size &amp; Approx. Capacity:</b> Part of the Greater Blackfriars Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment) 0.5 ha for 40 dwellings																	
<b>Site Ref:</b> 7; SALA FS02 (progressed as part of SA17 Southgate Moorings in 2016 & not progressed further in 2019 as no longer available)																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2016	0?	0?	0	-	+	++	+	-?	0	+	++	++	++	+	+	-	?
SA 2019	0?	0?	0	-	+	++	+	-?	0	+	++	++	++	+	+	-	+

**Sustainability Appraisal 2016:**  
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 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.

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.

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.

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 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); however, due to the proximity of the site to cultural facilities in the city Centre, it is considered that there could be minor positive effects but with some uncertainty.

**Update 2019:**

Site unlikely to be available in the next 5 years and will be retained as a car park serving Gloucester quays and the docks<sup>10</sup>. SFRA2 (Jan 2017) reported that 100% of the site is within FZ1 and thus no risk of flooding and neutral effects confirmed.

**SA Recommendations:**

- Include requirement for ecological studies to identify opportunities for biodiversity gain on this brownfield site and to promote aims of the JCS GI Strategy
- Historic environment and townscape studies to ensure that the Scheduled Monuments, Listed Buildings and their settings are protected and enhanced where possible; and in line with design requirements for the Conservation Area
- Archaeological studies required to investigate significant interest in area

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<sup>10</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<b>Site: Victoria Docks (Greater Blackfriars)</b>																	
<b>Size &amp; Approx. Capacity:</b> Part of the Greater Blackfriars Regeneration Area (total of 7.5ha to deliver 400 dwellings and 0.4ha employment)																	
<b>Site Ref:</b> 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	
SA 2016	0?	0?	0	-	+	++	+	0?	0	+	++	+	++	+	+	+	?

**Sustainability Appraisal 2016:**

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.

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.

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.

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.

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 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).

<b>Site: 104 Northgate Street (now part of Kings Quarter regeneration)</b>																
<b>Size &amp; Approx. Capacity: 0.06ha, 50m<sup>2</sup> employment land &amp; 20 dwellings</b>																
<b>Site Ref: 9; SALA FS10 (progressed as SA18 104 Northgate Street in 2016; now included within the Kings Quarter Allocation SA08 in 2019 for 156 dwellings)</b>																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
SA 2016	0	+	0?	0	+	+	0?	0	+	++	++	++	+	+	+	?
SA 2019	0	+	0	0	+	+	0?	0	+	++	++	++	+	+	+	+

**Sustainability Appraisal 2016:**  
The site is identified to deliver 20 new dwellings and 50m<sup>2</sup> 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); however, due to the proximity of the site to cultural facilities in the city Centre, it is considered that there could be minor positive effects but with some uncertainty.

**Update 2019:**

Confirmation of availability<sup>11</sup> and that this could progress as part of the Kings quarter redevelopment (please see **SA08**).

SFRA2 (Jan 2017<sup>12</sup>) identified that 67% of the site is within FZ1 and not at risk of flooding; 33% of the site is within FZ2 and development must avoid this area. The developable parts of the site will need to be determined by a further project level flood risk assessment including opportunities for using SUDS.

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<sup>11</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>12</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

Historic Impact Assessment (2016)<sup>13</sup> indicates 0.06 ha available for development with details of mitigation to be further agreed, confirming the potential for neutral effects but with some uncertainty until these further studies have been completed.

**SA Recommendations:**

- Include requirement for ecological studies to identify opportunities for biodiversity gain on this brownfield site and to promote aims of the JCS GI Strategy, including retention of existing trees and hedgerows
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<sup>13</sup> [https://www.gloucester.gov.uk/media/1099/fs10\\_104\\_northgate\\_street.pdf](https://www.gloucester.gov.uk/media/1099/fs10_104_northgate_street.pdf)

<b>Site: Land at The Wheatridge</b> <b>Size &amp; Approx. Capacity:</b> 2.28ha, 50 dwellings and open space <b>Site Ref:</b> 10; SALA SUB09 (progressed as SA04 Land at the Wheatridge in 2017; retained as <b>SA01 Land at The Wheatridge in 2019 for primary school &amp; approx. 10 residential dwellings</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2016	0	+	+	0	+	-	-	0	0	0	+	+	++	+	+	+	?
SA 2019	0	+	+	0	+	-	-	0	0	0	+	+	++	+	+	+	?
<b>Sustainability Appraisal 2016:</b>  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 the existing trees 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).

**Update 2019:**

This site is private land and the County Council informally allows an area of open space for use by dogwalkers<sup>14</sup>. The SFRA2 (Jan 2017)<sup>15</sup> reported that 100% of the site area is within FZ1 and thus no risk of flooding, confirming the minor positive effects for the previous SA.

The Historic Environment Assessment (Nov 2016)<sup>16</sup> concluded that all 2.28 ha of the site would be available for development with details of mitigation to be further agreed, thus confirming the likely neutral effects found by the previous SA.

**SA Recommendations:**

- Include requirement for ecological studies to identify opportunities for biodiversity gain on this greenfield site and to promote aims of the JCS GI Strategy, including retention of existing trees and open space
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<sup>14</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>15</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<sup>16</sup> [https://www.gloucester.gov.uk/media/1825/sub09\\_land\\_at\\_the\\_wheatridge.pdf](https://www.gloucester.gov.uk/media/1825/sub09_land_at_the_wheatridge.pdf)



<b>Site: Norville site, Tarrington Road</b> <b>Size &amp; Approx. Capacity: 0.84ha, 60 dwellings</b> <b>Site Ref: 11</b>																	
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	
<b>SA Summary</b>	+	+	0	0	+	++	+	0?	0	0	++	++	++	+	+	+	?
<p><b>Sustainability Appraisal 2016:</b>                      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.</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, 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.</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 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.</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 Tredworth Road, 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 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</p>																	

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).

<b>Site: Helipebs</b> <b>Size &amp; Approx. Capacity:</b> 1.6ha, 53 dwellings <b>Site Ref:</b> 12																	
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	
<b>SA Summary</b>	+	+	+	0	+	++	+	0	0	0	+	+	+	+	+	+	?
<b>Summary:</b> 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).



<b>Site: Former Civil Service Club</b> <b>Size &amp; Approx. Capacity:</b> 3.6ha, 60 dwellings and open space <b>Site Ref:</b> 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	
<b>SA Summary</b>	0	+	--	0	+	-	-	0?	0	0	-	+	+	+	+	+	+	?
<p><b>Sustainability Appraisal 2016:</b>            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.</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 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 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.</p> <p>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</p>																		

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).

<b>Site: 67-69 London Road</b> <b>Size &amp; Approx. Capacity:</b> 0.35ha, 30 dwellings <b>Site Ref:</b> 14; SALA ED044 (progressed as SA07 67-69 London Road in 2017; retained as <b>SA03 67-69 London Road Prospect House in 2019 for 30 dwellings</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2016	+	+	+	0	+	+	+	0?	0	0	++	++	+	+	+	+	?
SA 2019	+	+	+	0	+	+	+	0?	0	0	++	++	+	+	+	+	?
<b>Sustainability Appraisal 2016:</b>  <p>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.</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, 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.</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 it not known to be at risk from 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 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.</p>																	

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).

**Update 2019:**

The SFRA2 (Jan 2017)<sup>17</sup> reported that 100% of the site is within FZ1 indicating no risk of flooding and confirming the previous SA with minor positive effects.

The Historic Environment Assessment (Nov 2016)<sup>18</sup> reported that 0.35 ha of the site would be available for development with details of mitigation to be agreed, thus confirming the previous SA findings of likely neutral effects but with some uncertainty until detailed project level studies completed.

**SA Recommendations:**

- Consider including requirement for ecological studies to identify opportunities for biodiversity gain on this brownfield site and to promote aims of the JCS GI Strategy; protect and link with mature trees on boundary of site
- Historic environment and townscape studies to ensure that the Conservation Area is protected and enhanced where possible
- Archaeological studies required to investigate significant Roman (nearby Roman Road) and other interest in the area

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<sup>17</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<sup>18</sup> [https://www.gloucester.gov.uk/media/1821/ed044\\_67-69\\_london\\_road.pdf](https://www.gloucester.gov.uk/media/1821/ed044_67-69_london_road.pdf)

<b>Site: Wessex House (Railway Corridor)</b>																	
<b>Size &amp; Approx. Capacity: 0.25ha, Station car park/infrastructure for 20 dwellings</b>																	
<b>Site Ref: 15; SALA SUB51 (progressed as SA8 Wessex House in 2017; retained as SA04 Wessex House, Great Western Road in 2019 for 20 dwellings)</b>																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2016	+	+	+	-?	+	++	+	0	0	0	0	0	0	0	0	0	0
SA 2019	+	+	+	-?	+	++	+	0	0	0	+	+	+	+	0	+	+

**Sustainability Appraisal 2016:**

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 railway 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.

**Update 2019:**

The site is vacant/former electrical wholesalers with the Royal Hospital to the north, Telecom House to the east and the railway station to the south; identified in Railway Corridor Development Brief adopted March 2011<sup>19</sup>.

The SFRA2 (Jan 2017)<sup>20</sup> reported that 100% of the site is within FZ1 indicating no risk of flooding and confirming the previous SA with minor positive effects.

Possible contamination from previous industrial uses and potential noise and vibration from the nearby railway line; still available and updated information indicates that the dwellings capacity could be increased to 30 dph<sup>21</sup>; also potential for mixed use including educational facility.

The confirmation of residential use with 20 dwellings indicates minor positive effects with delivery of residential redevelopment.

Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25); however, the proximity to the city centre with cultural facilities indicates the potential for a minor positive effect but with some uncertainty.

**SA Recommendations:**

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<sup>19</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>20</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<sup>21</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<b>Site: Former Telecom House (Railway Corridor)</b> <b>Size &amp; Approx. Capacity:</b> 0.63ha, Station carpark/infrastructure <b>Site Ref:</b> 16																		
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	
<b>SA Summary</b>	+	+	+	-?	+	++	+	0	0	0	0	0	0	0	0	0	0	0
<b>Sustainability Appraisal 2016:</b>  <p>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 &amp; 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.</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, 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.</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 against SA Objective 5.</p> <p>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.</p>																		

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.



<b>Site: Great Western Road Sidings (Railway Corridor)</b> <b>Size &amp; Approx. Capacity:</b> 4.34ha, 100 dwellings <b>Site Ref:</b> 17; SALA HA20 (progressed as SA9 Great Western Rd Sidings in 2017; retained as <b>SA05 Great Western Road Sidings in 2019 with capacity for approx. 200 new dwellings</b> )																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
SA 2016	+	+	+	-	+	+	0	0	0	++	+	+	++	+	+	?
SA 2019	++	+	+	-?	+	+	0	0	0	++	+	+	++	+	+	+

**Sustainability Appraisal in 2016:**

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); however, due to the proximity of the site to cultural facilities in the city Centre, it is considered that there could be minor positive effects but with some uncertainty.

**Update 2019:**

Possible contamination from previous industrial uses and potential noise and vibration from the nearby railway line;  
Still available and updated information indicates that the dwellings capacity could be increased.  
Also, advised that a Phase 1 Habitat survey completed (March 2018).<sup>22</sup>

The SFRA2 (Jan 2017)<sup>23</sup> reported that 100% of the site is within FZ1 indicating no risk of flooding and confirming the previous SA with minor positive effects.

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<sup>22</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>23</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

**SA Recommendations:**

- Consider including requirement for ecological studies to identify opportunities for biodiversity gain on this brownfield site and to promote aims of the JCS GI Strategy (recent Phase 1 Habitat survey will guide possibilities)
- Consider including requirement for improvements to pedestrian and cycle facilities to mitigate minor negative effects

<b>Site: Former Bishops College</b>																	
<b>Size &amp; Approx. Capacity: 9.18ha, 108 dwellings (to include retained playing pitches)</b>																	
<b>Site Ref: 18</b>																	
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	
SA Summary	+	+	0	-	+	-	-	0	0	0	-	+	+	++	+	+	?
<b>Sustainability Appraisal 2016:</b>																	
<p>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.</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 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</p>																	

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).

<b>Site: Land at Leven Close</b> <b>Size &amp; Approx. Capacity: 1.4ha, 20 dwellings</b> <b>Site Ref: 19</b>																	
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	
<b>SA Summary</b>	0	+	+	0	+	++	+	-?	0	0	++	+	+	+	+	+	?
<b>Sustainability Appraisal:</b>  <p>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.</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 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.</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 Paygrove 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 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</p>																	

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 (part of) - Lynton Fields**

**Size & Approx. Capacity:** 16.04ha, 150 Dwellings (2016) 2 major land parcels now with planning permission (2019)

**Site Ref:** 20; SALA ref EA03 (progressed as SA13 Land East of Waterwells Business Park in 2016; residential land now with planning permission, so retained for progression as SA07 Lynton Fields with 2.0 ha for employment uses in 2019)

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	
SA 2016	0	+	0	-	-	--	-	0	0	0	+	+	-	+	+	+	?
SA 2019	++?	+	+	0	-?	--	-	0	0	++	+	+	-	0	+	+	?

**Sustainability Appraisal in 2016:**

Three parcels of greenfield land surrounded by employment, agriculture and some residential uses. 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 of 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).

**Update in 2019:**

Planning permissions granted in 2018 for the 2.3 ha parcel of land to the west with 86 dwellings and 150 dwellings on the 4.0 ha parcel of land to the east.<sup>24</sup> Therefore, the central land parcel to the north adjacent to the existing development with employment uses is retained and progressed as SA07 Lynton Fields, important as a source of strategic employment land in the district.

The change from housing to strategic employment development changes the previous SA findings from major positive to neutral and from neutral to major positive effects respectively. The delivery of new employment can also contribute to reducing inequalities confirming the potential for a minor long-term positive effect against SA Objective 16.

The SFRA2 (Jan 2017)<sup>25</sup> reported that 100% of the site is within FZ1 indicating no risk of flooding and amending the previous SA with minor positive effects. However, there is the small stream at the southern boundary of the site, upper reaches of the Dimore Brook, a tributary of the R Severn to the west. It is considered that SUDS could be incorporated into the development design and integrate biodiversity enhancements, including linking with the wider GI for both wildlife and people – concomitant positive effects for biodiversity and health – potential for major positive effects but uncertainty at this stage until further studies completed.

The site remains not well connected to public transport, services and facilities, although just within 800m walking distance of the nearest Local Centre and the previous SA findings for SA Objectives No 6a&b, and 14 remain relevant and valid. There are footpaths to the east and south; if there could be connections made, perhaps through the other residential parcel that has recently gained planning permission, there would be enhanced access to walking routes in the countryside and providing some mitigation and introducing some uncertainty of significance for SA No 6b for sustainable transport.

The Historic Environment Assessment<sup>26</sup> concluded that development on the EA03 site could be developed within significant harm to the heritage assets provided that certain areas are left free from development for mitigation through avoidance. The three late 19<sup>th</sup> century houses set within the remains

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<sup>24</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>25</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<sup>26</sup> [https://www.gloucester.gov.uk/media/1104/ea03\\_land\\_east\\_of\\_-waterwells\\_business\\_park.pdf](https://www.gloucester.gov.uk/media/1104/ea03_land_east_of_-waterwells_business_park.pdf)



of medieval strip fields are not designated assets but have a local importance. Site option SA07 avoids these building and thus confirms neutral effects for SA Objective No 9.

**SA Recommendations:**

- Consider including requirement for ecological studies to identify opportunities for biodiversity gain on this greenfield site and to promote aims of the JCS GI Strategy, including possibilities to connect to the wider GI network and consideration of SUDS linking with the brook and GI
- Consider any opportunities for improving public transport, walking & cycling routes

<b>Site: Land at Clearwater Drive</b> <b>Size &amp; Approx. Capacity:</b> 2.09ha, 30 dwellings and open space <b>Site Ref:</b> 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
SA Summary	-	+	0	0	+	-	-	0	0	0	+	+	++	+	+	+	?
<b>Sustainability Appraisal 2016:</b>  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 Severnvale 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).

<b>Site: Land South of Grange Road</b> <b>Size &amp; Approx. Capacity: 16.55ha, 250 dwellings</b> <b>Site Ref: 22</b>																	
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	
<b>SA Summary</b>	0	+	0	-	+	-	-	0	0	0	+	+	++	++	+	+	?
<b>Sustainability Appraisal in 2016:</b>  <p>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.</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 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.</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 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.</p> <p>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</p>																	

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	
<b>SA Summary</b>	0	+	--	0	+	+	+	0	-	+	++	+	++	0	+	+	?

**Sustainability Appraisal in 2016:**

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).

<b>Site: Secunda Way Industrial Estate</b> <b>Size &amp; Approx. Capacity:</b> 0.7ha employment land <b>Site Ref:</b> 24 & progressed as <b>SA22 Secunda Way Industrial Estate</b> for employment land use																	
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	
SA 2016	0	+	0	0	+	-	-	0	0	+	++	+	++	0	+	+	?
SA 2019	0	+	0	0	+	-	-	0	0	+	++	+	++	0	+	+	?
<b>Sustainability Appraisal in 2016:</b>  <p>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.</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 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.</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>																	

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).

**Update 2019:**

Site is now available for employment use

**SA Recommendations:**

- Consider including requirement for ecological studies to identify opportunities for biodiversity gain on this greenfield site and to promote aims of the JCS GI Strategy, including retention of existing hedgerows and possibilities to connect to the wider GI network

<b>Site: Land at Rea Lane, Hempsted</b>																	
<b>Size &amp; Approx. Capacity: 1.5ha, 35 dwellings</b>																	
<b>Site Ref: 25; SALA SUB54 (progressed as SA23 Land at Rea Lane in 2017; retained as SA12 Land at Rea Lane in 2019 for 30 dwellings)</b>																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2016	0	+	+	0	+	-	-	0	0	0	-	+	-	+	+	+	?
SA 2019	0	+	+	0	+	-	-	0	0	0	-	+	-	+	+	+	?
<b>Sustainability Appraisal in 2016:</b>																	
<p>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</p>																	



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 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).

**Update 2019:**

Planning application pending consideration – for 30 dwellings.<sup>27</sup>

The SFRA2 (Jan 2017)<sup>28</sup> reported that 100% of the site is within FZ1 indicating no risk of flooding and confirming the previous SA with minor positive effects.

The Historic Environment Assessment<sup>29</sup> concluded that the total area of 1.47 ha would be available for development subject to detailed mitigation to be agreed, confirming the neutral effects previously found in the SA.

**SA Recommendations:**

- Consider including requirement for ecological studies to identify opportunities for biodiversity gain on this greenfield site and to promote aims of the JCS GI Strategy, including retention of existing hedgerows and possibilities to connect to the wider GI network
- Consider requirement for archaeological studies
- Need to consider the impacts on Hempsted Conservation Area and its setting
- Need to include requirement for good design/layout to help mitigate the high to medium landscape sensitivity

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<sup>27</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>28</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<sup>29</sup> [https://www.gloucester.gov.uk/media/1838/sub54\\_land\\_at\\_rea\\_lane.pdf](https://www.gloucester.gov.uk/media/1838/sub54_land_at_rea_lane.pdf)

<b>Site: Land adjacent to Eastgate Shopping Centre</b> <b>Size &amp; Approx. Capacity:</b> 0.32ha, 0.5ha employment land <b>Site Ref:</b> 26; SALA ref FS16 (progressed as SA19 Land Adjacent to Eastgate Shopping Centre in 2016; and retained <b>as SA16 Land Adjacent to Eastgate Shopping Centre SA12 in 2019</b> ) for 15 dwellings																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape/ Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
SA 2016	+	+	+	0	+	+	-?	0	+	++	++	++	0	+	+	?
SA 2019	+	+	+	0	+	+	-?	0	0	++	++	++	+	+	+	?
<b>Sustainability Appraisal 2016:</b> 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).

**Update 2019:**

The changing retail market indicates that this site could be suitable for residential purposes.<sup>30</sup> Therefore, SA changed from neutral to minor positive for Housing & from minor positive to neutral for Employment – to acknowledge the change in proposed use.

The SFRA2 (Jan 2017)<sup>31</sup> reported that 100% of the site is within FZ1 indicating no risk of flooding and confirming the previous SA with minor positive effects.

**SA Recommendations:**

- Consider requirement for archaeological studies

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<sup>30</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>31</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

- Need to consider the impacts on the City Centre Conservation Area, Scheduled Monuments and their setting

**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	
<b>SA Summary</b>	0	+	+	0	+	-	-	0?	0	0	++	+	++	+	+	+	?

**Sustainability Appraisal in 2016:**  
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 specie; 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).

<b>Site: Land at St Oswalds</b> <b>Size &amp; Approx. Capacity:</b> 2.5ha, 65 dwellings <b>Site Ref:</b> 28; SALA ref SUB28 (progressed as SA20 Land at St Oswalds in 2017; retained as <b>SA11 Land at St Oswalds in 2019</b> and size/capacity increased to 6.44 ha and approx. 300 dwellings)																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
SA 2016	+	+	--	-	+	+	0	0	0	++	++	++	+	+	+	?
SA 2019	++?	+	0?	-?	+	+	0	0?	0	++	++	++	++	+	+	?
<b>Sustainability Appraisal in 2016:</b>  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.  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 and its size, it is considered that there are potential opportunities to record and enhance biodiversity on site, with the potential for a major long-term positive effect against SA Objective 1 but with some uncertainty at this stage until further studies are 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. 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 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 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.

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.

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 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).

**Update 2019:**

For clarification, at the request of the landowner, an additional 3.94 ha eastern parcel has been added to that previously included as part of the SALA site SUB28.<sup>32</sup> Therefore, SA changed from minor positive for Housing to major positive – to acknowledge the increase in provision of housing with enhanced positive effects indicated.

It is understood from the SALA update that a recent survey of the original SUB28 site did not find any protected species but did indicate that there were habitats that could potentially support species such as Bats, Birds, and Reptiles. Therefore, this confirms the minor positive effects reported by the previous SA with opportunities to protect and enhance important biodiversity; this additional size of the development site may suggest that there is more scope to achieve biodiversity gain and including linking with the wider GI network. The increased size of the site also may offer increased opportunities for enhancing the sustainable transport network with cycleways and pathways linking with the wider network and integrating with GI for

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<sup>32</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

additional health/wellbeing and biodiversity positive effects. Therefore, there may be possibilities for increasing the previous SA findings to potential major positive effects on biodiversity – but uncertainty remaining at this stage until further project level studies completed.

The SFRA2 (Jan 2017)<sup>33</sup> reported that 0% of the site is within FZ1 but 100% in FZ2 with 9% in FZ3 indicating risk of flooding and confirming the previous SA with negative effects. The SFRA2 advised that development will be possible if it can be demonstrated that flood risk will not be exacerbated elsewhere and that it avoids the FRZ3 area. Thus, possibilities for mitigating the negative effects are indicated and suggest that the SA findings may be amended from major to minor negative but with some uncertainty remaining as details of project level design/layout are not yet available.

It is understood now that a high-pressure gas main runs through the site; and further studies to ensure safety, including investigations into any contamination will be required.

**SA Recommendations:**

- Include requirement for further ecological studies to identify opportunities for biodiversity gain on this large brownfield site and to promote aims of the JCS GI Strategy, including possibilities to connect to the wider GI network and integrating flood risk management SUDS
- Consider requirement to provide/improve cycleways and pathways, including linkages and integrating with the GI network, where possible, for further enhancements for human health/wellbeing and biodiversity
- Detailed design and layout should include consideration of appropriate planting buffers to help mitigate for any noise/vibration from the railway line – and again integrated with the wider GI network

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<sup>33</sup> Atkins for Gloucester City Council (January 2017) SRFA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>



**Site: Allstones, Myers Road (Railway Corridor)**  
**Size & Approx. Capacity:** 6.49ha, 250 dwellings  
**Site Ref:** 29; SALA ref 03NEW18 (not progressed in 2017 as suitability not justified for loss of employment land; progressed as much smaller site 0.36 ha c 10 dwellings as **SA19 Land off Myers Road in 2019**)

SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
SA 2016	+	+	0	- +	+	+	0	0	0	+	+	+	++	+	+	?
SA 2019	+?	+	+	0 +	+	+	0	0	0	+	+	+	+	+	+	?

**Sustainability Appraisal in 2016:**

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).

**Update 2019:**

The SALA includes a much smaller site with only c 10 dwellings than that previously subject to SA earlier in 2016.<sup>34</sup> Therefore, SA changed from major positive for Housing to minor positive – to acknowledge the significant decrease in provision of housing and reduced positive effects indicated. With such a reduced site size, the opportunities for biodiversity net gain are less certain – a minor positive is retained for the SA but revised to include some uncertainty of this significance.

It is understood from the SALA that the site is fairly close to the recorded locations of two Roman period lead coffins so a chance that a cemetery extends into the area and indicates need for archaeological investigation. Previous SA findings are still relevant and valid.

The SFRA2 (Jan 2017)<sup>35</sup> reported that 100% of the site is within FZ1 confirming that there is no flood risk and therefore, the previous SA is changed to minor positive from neutral to reflect the updated information.

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network

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<sup>34</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>35</sup> Atkins for Gloucester City Council (January 2017) SFRA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

<b>Site: Barnwood Manor</b> <b>Size &amp; Approx. Capacity:</b> 1.95ha, 20 dwellings <b>Site Ref:</b> 30; SALA ref SUB25 (progressed as SA7 Land at Barnwood Manor in 2017; retained for progression as <b>SA02 Land at Barnwood Manor in 2019</b> with 30 dwellings)																			
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			
SA 2016	0?	+	0	0	+	+	-	+	-	0?	0	0	+	+	--	+	+	+	?
SA 2019	+	+	0	0	+	+	-	+	-	0?	0	0	+	+	--	+	+	+	?
<b>Sustainability Appraisal in 2016:</b> 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 associated with the Wotton Brook. 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 some 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).

#### **Update 2019:**

The SALA includes a larger site at 3.38 ha and high capacity of 31 dwellings than that previously subject to SA earlier in 2016 with only 20 dwellings.<sup>36</sup> However, the SA findings remain relevant and valid with only minor positive effects indicated (compared to other sites at 100 or more dwellings that would indicate the potential for major positive effects). With an enhanced site size and housing capacity, the opportunities for effects on biodiversity – both negative and positive are increased but still with some uncertainty at this stage until further project level studies are undertaken.

The SFRA2 (Jan 2017)<sup>37</sup> reported that 85% of the site is within FZ1 confirming that there is no flood risk for much of the site; 15% of the site along the Wotton Brook is in FZ2 of which 9% is in FZ3 with a high risk of flooding and therefore, the previous SA is confirmed at neutral effects. The SFRA2 reported that development could be avoided in FZ2 & 3. It is considered that this corridor along the Brook could offer opportunities through provision of SUDS for biodiversity gain – and including links with the wider GI network with possibilities for positive effects on wildlife and health wellbeing – some uncertainty at this stage until further project level studies completed.

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<sup>36</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>37</sup> Atkins for Gloucester City Council (January 2017) SFRA Level 2 <https://www.gloucester.gov.uk/media/2793/gloucester-sfra-level2-final-report-v3.pdf>

**SA Recommendations:**

- Include requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network, especially along the Wotton Brook and as part of delivery of SUDS
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<b>Site: Redcliffe College, Horton Road</b> <b>Size &amp; Approx. Capacity: 1.3ha, 20 dwellings</b> <b>Site Ref: 31</b>																	
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	
SA Summary	+	+	+	0	+	-	-	0?	0	0	++	++	+	+	+	--	?
<p><b>Sustainability Appraisal in 2016:</b>                      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.</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, 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.</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 with the potential minor positive against SA Objective 5.</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 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).

<b>Site: Holly House, Barnwood</b> <b>Size &amp; Approx. Capacity: 1.16ha, 34 dwellings</b> <b>Site Ref: 32</b>																			
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			
<b>SA Summary</b>	+	+	0	0	+	+	-	+	-	0	0	0	+	++	+	+	+	+	?
<b>Sustainability Appraisal in 2016:</b> 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).

<b>Site: Fieldview House, Barnwood/Abby</b> <b>Size &amp; Approx. Capacity: 0.36ha, 12 dwellings</b> <b>Site Ref: 33</b>																	
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	
SA Summary	+	+	+	0	+	+	+	0	0	0	+	++	--	+	+	+	?
<b>Sustainability Appraisal in 2016:</b> 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).

<b>Site: Land off Horton Road (NHS)</b> <b>Size &amp; Approx. Capacity: 0.72ha, 21 dwellings</b> <b>Site Ref: 34</b>																	
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	
SA Summary	+	+	+	0	+	-	-	0?	0	0	++	+	+	+	+	+	?
<b>Sustainability Appraisal in 2016:</b>  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).

<b>Site: Hallmark Hotel, Matson</b> <b>Size &amp; Approx. Capacity:</b> 0.43ha, 13 dwellings <b>Site Ref:</b> 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	
<b>SA Summary</b>	+	+	+	0	-	++	+	0?	0	0	+	++	++	+	+	+	?
<b>Sustainability Appraisal in 2016:</b>																	
<p>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.</p> <p>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</p>																	

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).

<b>Site: Land adjacent to St Aldates</b> <b>Size &amp; Approx. Capacity: 0.5ha, 20 dwellings</b> <b>Site Ref: 37</b>																	
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	
SA Summary	+	+	+	0	+	-	-	0?	0	0	+	++	++	+	+	+	?+
<b>Sustainability appraisal in 2016:</b>  <p>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.</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, 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.</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 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 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.</p> <p>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</p>																	

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).

<b>Site: Land East of Hempsted Lane</b> <b>Size &amp; Approx. Capacity: 3.38ha, 50 dwellings</b> <b>Site Ref: 39</b>																	
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
SA Summary	0	+	+	0	+	-	-	0	0	0	-	+	-	+	+	+	?

**Sustainability Appraisal in 2016:**

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).

<b>Site:</b> MOD Site, Hempsted <b>Size &amp; Approx. Capacity:</b> 4.42ha, 85 dwellings <b>Site Ref:</b> 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
<b>SA Summary</b>	0	+	- ?	0 +	-	-	0	-	0	++	+	++	+	+	+	?
<b>Sustainability Appraisal in 2016:</b>  <p>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.</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 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.</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 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</p>																



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).

<b>Site: Former Contract Chemicals</b>																	
<b>Size &amp; Approx. Capacity:</b> 9.19ha, 340 dwellings																	
<b>Site Ref:</b> 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
<b>SA Summary</b>	-	+	0	-	+	+	+	0	0	0	+	++	+	++	+	+	?
<b>Sustainability Appraisal in 2016:</b>																	
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).

<b>Site: Land adjacent to Wall's Factory</b> <b>Size &amp; Approx. Capacity: 6.4ha, 2.79ha employment</b> <b>Site Ref: 44</b>																	
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	
<b>SA Summary</b>	0	+	0	-	+	-	-	0	-	++	+	+	--	0	+	+	?
<p><b>Sustainability Appraisal in 2016:</b></p> <p>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.</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 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.</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 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.</p> <p>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</p>																	

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).

<b>Site: Land adjacent to Dry Dock</b> <b>Size &amp; Approx. Capacity:</b> 1.35ha, 1.35ha employment <b>Site Ref:</b> 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	
<b>SA Summary</b>	0?	0?	--	0	+	++	+	- ?	0	+	++	+	++	0	+	+	?
<b>Sustainability Appraisal in 2016:</b> 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).

<b>Site: Former Colwell Youth &amp; Community Centre</b> <b>Size &amp; Approx. Capacity:</b> 0.18ha, 20 dwellings <b>Site Ref:</b> 46; SALA ref FS08 (progressed as <b>SA13 Former Colwell Youth &amp; Community Centre in 2019</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2019	+?	+	+	0	+	+	+	0	0	0	+	+	+	+	+	+	-?
<b>Sustainability Appraisal in 2019:</b>  The site identified to deliver 20 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; it is currently a small urban site used as a community facility and provision of 20 dwellings could include biodiversity enhancements through provision of GI with the potential for minor positive effects but uncertain at this stage.  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 100% in FZ1 with no risk of flooding <sup>38</sup> indicating positive effects.  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 Metz Way, national cycle routes and Public Rights of Way with the potential for a minor long-term positive effect against SA Objective 6b.																	

<sup>38</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

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 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.

The site is currently in use as an arts centre and there is the potential for negative effects on cultural heritage (SA Objective 25) if the building is converted to flats – unless mitigation is available through provision of such cultural facilities elsewhere.

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network



<b>Site: Land at Blackbridge</b> <b>Size &amp; Approx. Capacity:</b> 0.8ha, 30 dwellings <b>Site Ref:</b> 47; SALA ref 03NEW17 (progressed as <b>SA14 Land off New Dawn View in 2019</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA 2019	+	+	+	0	+	+	+	0	0	0	+	+	+	+	+	+	?
<b>Sustainability Appraisal in 2019:</b>  The site identified to deliver 30 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; it is currently a small urban site used as a community facility and provision of 30 dwellings could include biodiversity enhancements through provision of GI with the potential for minor positive effects but uncertain at this stage. There are vacant playing fields to the west (and see also SA06) and allotments to the northeast, as well as a track on the old railway line adjacent to the south and west, so potential for linking with the wider GI network.  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 100% in FZ1 with no risk of flooding <sup>39</sup> indicating positive effects.  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 in Tuffley and Public Rights of Way with the potential for a minor long-term positive effect against SA Objective 6b.																	

<sup>39</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

The site is not known to contain best and most versatile agricultural land; currently vacant playing fields so greenfield land with 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 greenfield 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 adjacent to the railway line to the south and there may be issues associated with noise and vibration 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 near to services and facilities including 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; with a path and track linking to streets to the north and south, potential for a minor positive effect against SA Objective 17. The site is located on existing open green space of vacant playing fields and loss of this amenity has the potential for a minor long-term negative effect against SA Objectives 19-20 with some uncertainty of significance and mitigation possibilities are unknown; the site is within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Potential effects on cultural heritage (SA Objective 25) are unknown since evidence is not available at this stage.

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network

<b>Site: Blackbridge Sports Hub</b> <b>Size &amp; Approx. Capacity:</b> N/A Sports Hub <b>Site Ref:</b> 48; SALA ref 01NEW17 (progressed as SA12 Blackbridge Sports Hub in 2017; retained for progression as <b>SA06 Blackbridge Sports Hub in 2019</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA Summary	+	+	+	0	+	-	+	0	0	+?	+	+	++	0	+	+	++
<b>Sustainability Appraisal in 2019:</b>  <p>The site is a playing field with an actively used running track; it has been identified in the adopted Gloucester Playing Pitch Strategy as being a significant opportunity. The site is not identified to deliver housing or employment with neutral effects for SA objectives 12-13 &amp; 18. The delivery of a sports hub could also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16, especially for accessibility for residents in the south of the city.</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, and development will not lead to fragmentation of ecological corridors; it is currently a greenfield playing field site so could include biodiversity enhancements with the potential for minor positive effects but uncertain at this stage. so potential for linking with the wider GI network.</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 100% in FZ1 with no risk of flooding<sup>40</sup> indicating positive effects.</p> <p>Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects with likely neutral effects 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 in Tuffley and street walking access with the potential for a minor long-term positive effect against SA Objective 6b.</p>																	

<sup>40</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

The site is not known to contain best and most versatile agricultural land; currently vacant playing fields so greenfield land with 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 greenfield 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 greenfield and unlikely to be any issues for contamination or pollution – neutral effects for SA Objective No 11.

It is assumed that the development of a Sports Hub would be associated with some additional local employment such that some positive effects would be achieved but uncertainty of significance at this stage as information about details and jobs not known.

The site is located near to services and facilities including 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; development of a Sports Hub is likely to have major positive effects against SA Objective 17 for health, especially for residents in the south of the City. The site is located on existing open green space playing fields and the development of this amenity as a Sports Hub would increase access with the potential for a minor long-term positive effect against SA Objectives 19-20. The site is within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24.

Potential effects on cultural heritage (SA Objective 25) are likely to be major positive since sports provide people with opportunities for social interaction through which skills can be developed; culture and sports are both human rights.

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network

<b>Site: Land East of Sneedhams Road</b> <b>Size &amp; Approx. Capacity:</b> 0.86 ha; 30 dwellings <b>Site Ref:</b> 49; SALA ref 07NEW17 (progressed as <b>SA15 Land south of Winnycroft Allocation in 2019</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA Summary	+	+	+	0	+	-	+	0	0	0	+	+	++	+	+	+	++
<b>Sustainability Appraisal in 2019:</b>  The site is identified to deliver 28 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; it is currently in use as agricultural land so could include biodiversity enhancements with the potential for minor positive effects but uncertain at this stage. so potential for linking with the wider GI network.  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. There is a drain alongside Winnycroft Lane and extending along part of the western boundary to the site. There appears to be no links to watercourses and the wider R Severn surfacewater catchment area; the site is located 100% in FZ1 with no risk of flooding <sup>41</sup> indicating positive effects.  Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects with likely neutral effects 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 at the																	

<sup>41</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

southern edge of the City with limited access to bus services, although adjacent to Winnycroft Lane and close to pedestrian street routes with a likely neutral effect against SA Objective 6b but some uncertainty at this stage.

The site is graded agricultural land classification grade 3b<sup>42</sup> and therefore is not best and most versatile agricultural land as defined in the NPPF and therefore, minor negative effects for Sa Objective No 7.

At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is greenfield 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. However, the site is within the National Historic Landscape Characterisation for open strip fields, so some uncertainty of effects at this stage until further project level studies completed.

The site is greenfield and unlikely to be any issues for contamination or pollution – neutral effects for SA Objective No 11.

The site is not located near to services and facilities including a Local Centre with the potential for a minor negative effect against SA Objective 14. The site is not located within 800m of existing medical facilities with the potential for minor negative effects against SA Objective 17 for health. However, the site is at the edge of the urban area with nearby footpaths that could encourage walking in the countryside so some uncertainty at this stage of overall significance.

The site is located on existing agricultural land with the potential for minor positive effects against SA Objectives 19-20 and nearby access to green and open space. The site is not within 800m of existing educational facilities with the potential for a minor negative effect against SA Objective 24.

Potential effects on cultural heritage (SA Objective 25) are unknown at this stage.

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network

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<sup>42</sup> <https://magic.defra.gov.uk/MagicMap.aspx> [accessed March 2019]

<b>Site: Land off Eastgate Street</b> <b>Size &amp; Approx. Capacity:</b> 0.13 ha, 15 dwellings <b>Site Ref:</b> 50; SALA 05NEW (progressed as <b>SA16 Land off Eastgate Street in 2019</b> ).																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
<b>SA Summary</b>	0	+	+	0	+	++	+	- ?	0	0	++	++	++	+	- ?	+	+
<b>Sustainability Appraisal (2019):</b>  <p>The site is identified to deliver 15 new dwellings with the potential for minor long-term positive effects 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 004F), new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16. The site is currently used as single storey businesses and it is assumed that these will be retained with overall neutral effects on employment and SA Objectives No 12-13</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, and development will not lead to fragmentation of ecological corridors. Given the nature of the site as brownfield land, currently used as single storey businesses, and with intention to deliver flats above the shops<sup>43</sup>, it is considered that there are limited opportunities to record and enhance biodiversity on site, and neutral effects indicated 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 located 100% in FZ1 with no risk of flooding<sup>44</sup> indicating positive effects.</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</p>																	

<sup>43</sup> Strategic Assessment of Land Availability SALA updated 2018 <https://www.gloucester.gov.uk/planning-development/planning-policy/strategic-assessment-of-land-availability-sala/>

<sup>44</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

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 railway station, bus services, national cycle route and Public Rights of Way with the potential for a major long-term positive effect against SA Objective 6b.

The site does not contain any best and most versatile agricultural land, is totally previously developed land and therefore, with the 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 currently single storey businesses, 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 through redevelopment and enhancement to the existing townscape.

The site is in a sensitive heritage setting, located within the Eastgate and St Michaels Conservation Areas; there are several Listed Buildings to the west of the site<sup>45</sup>; the site also lies within an Area of Principal Archaeological Interest with the route of the Roman road known as the Portway extending through the northern part of the site. It is assumed that development at the site would 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.

At this stage, to reflect the presence of important archaeology 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 metres 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); however, the proximity to the city centre with cultural facilities indicates the potential for a minor positive effect but with some uncertainty.

**SA Recommendations:**

- Historic environment and townscape studies to ensure that the settings of nearby Listed Buildings are protected and enhanced where possible; design principles should promote Conservation Area requirements
- Archaeological studies and heritage impact assessment required to investigate significant Roman interest in the area

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<sup>45</sup> <https://magic.defra.gov.uk/MagicMap.aspx> [accessed March 2019]



<b>Site: Southern Railway Triangle</b> <b>Size &amp; Approx. Capacity:</b> 4.22 ha, 0 dwellings <b>Site Ref:</b> 51; SALA ref HA20B (progressed as <b>SA17 Southern Railway Triangle in 2019</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA Summary	++?	+	+	0	+	+	+	0	0	++?	+	+	+	0	+	+	?
<b>Sustainability Appraisal in 2019:</b>  In 2017, the site was reserved for future Strategic Rail Freight use, however, the SALA noted that if such use is not forthcoming in the next 5 years, it will then be available for development in the 6-10 year category. The site is not suitable for residential use and therefore, neutral effects for SA objective 18. Provision of additional local employment could also contribute to reducing inequalities with the potential for a minor long-term positive effect against SA Objective 16, but uncertainty at this stage until further information is available. The site currently provides employment for railway uses; it is assumed that any new employment use might be encouraged to promote the overall aspirations for the GLP with additional jobs and potential for a range of positive effects – but uncertainty at this stage.  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; it is currently an operational railway site. Such brownfield sites are often rich in biodiversity and with the size of the site, it is considered that there may be opportunities for biodiversity enhancements through provision of GI, including links to the wider GI network, with the potential for major positive effects but uncertain at this stage.  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 100% in FZ1 with no risk of flooding <sup>46</sup> indicating positive effects.  Transport modelling is unavailable at this stage, although it is considered unlikely to lead to any significant negative effects and it is considered that there is 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																	

<sup>46</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

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 Metz 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 brownfield currently used for railway purposes, development therefore has the potential for a major long-term positive effect against SA Objective 7 through reuse of land. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, 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. However, there may be significant archaeological potential, so some uncertainty of significance at this stage until further project level studies.

The site is adjacent to the railway line at the western edge and there is the potential for noise, vibration and air pollution from the railway with 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 not located within a Local Centre boundary but is located well within existing services and facilities 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.

The effects on cultural heritage are unknown (SA Objective 25).

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network
- Archaeological studies required to investigate potential significant assets
- Detailed design and layout should include consideration of appropriate planting buffers to help mitigate for any noise/vibration and air pollution from the railway line – and again integrated with the wider GI network
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<b>Site: Jordans Brook House</b> <b>Size &amp; Approx. Capacity:</b> 0.85 ha, 20 dwellings <b>Site Ref:</b> 52; SALA ref 02NEW18 (progressed as <b>SA18 Jordans Brook House in 2019</b> )																		
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		
SA Summary	+	+	+	0	+	+	+	-	0?	0	0	+	+	++?	+	+	+	?
<b>Sustainability Appraisal in 2019:</b> 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 <sup>47</sup> is located within 200m to the west of the site; the arboretum has many mature trees and unimproved grassland, providing habitat for birds, insects and small mammals <sup>48</sup> . There are large trees on the site, particularly on the North Upton Lane boundary to the east. It is considered that there may be opportunities for biodiversity enhancements through provision of GI, including links to the wider GI network, with the potential for minor positive effects that will be long-term.  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 100% in FZ1 with no risk of flooding <sup>49</sup> indicating positive effects.  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, including a footpath linking with the Barnwood Park, so potential for a minor long-term positive effect against SA Objective 6b.																		

<sup>47</sup> <https://magic.defra.gov.uk/MagicMap.aspx>

<sup>48</sup> <https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1082965>

<sup>49</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

The site is currently in use as a residential care home; there is no best and most versatile agricultural land on the site. As this is currently in residential use, redevelopment would not affect the soil quality and therefore, minor positive effects indicated for SA Objective No 7.

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 redevelopment of an existing residential area.

The site is located within an Area of Principal Archaeological Importance; a Roman cemetery is recorded to the north whilst prehistoric and Roman settlement activity is noted to the west; the site was also the location of a WWII military camp. There are no Scheduled Monuments or Listed Buildings within or nearby the site. Given policy mitigation provided through the JCS and Draft GCP it is assumed that development at the site would be sensitively and responsively designed and including appropriate archaeological investigation prior to development. Potential for a residual neutral effect against SA Objective 9, with some 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 within 800m to existing walking routes, and access to Barnwood Arboretum, located within 800m of existing medical facilities with the potential for a major 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).

**SA Recommendations:**

- Include requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network
- Archaeological studies required to investigate potential significant assets
-

<b>Site: Glevum Works</b> <b>Size &amp; Approx. Capacity:</b> 0.54 ha; c 10 dwellings <b>Site Ref:</b> 53 SALA ref FS09 Rear of Smith & Choyce, Upton Street (not progressed as no longer available)																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA Summary	++?	+	+	0	+	++	+	0	0	-?	+	+	+	+	+	+	?
<b>Sustainability Appraisal in 2019:</b>  <p>The site is identified to deliver around 10 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 is a trading estate and currently used for employment purposes including removals/storage; it is uncertain at this stage whether all the existing employment would be lost but likely for some negative effects with uncertainty of significance until further information including possibilities for mitigation such as provision of alternative and/or enhanced employment space.</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, and development will not lead to fragmentation of ecological corridors. It is currently an urban employment/trading site and provision of around 10 dwellings could include biodiversity enhancements through provision of GI, especially with the green space to the west at St James' Park and there may be opportunities for GI linkages - potential for major positive effects but uncertain at this stage.</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 100% in FZ1 with no risk of flooding<sup>50</sup> indicating positive effects.</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</p>																	

<sup>50</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services, 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; the site is brownfield, development therefore will have a major long-term positive effect against SA Objective 7 through redevelopment of previously developed land. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is currently in employment use 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 through redevelopment. The site does not contain and is not located in close proximity to any designated heritage assets; to the south of the site, there is one Listed Building about 130m and another about 250m distance<sup>51</sup> – development is unlikely to affect their settings. Development is unlikely to affect any heritage setting with the potential for a neutral effect against SA Objective 9.

The site is located nearby to shops, services and facilities 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).

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network

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<sup>51</sup> <https://magic.defra.gov.uk/MagicMap.aspx>

<b>Site: White City Replacement Community Facility</b> <b>Size &amp; Approx. Capacity:</b> 0.42 ha, community use <b>Site Ref:</b> 54; SALA ref (progressed as <b>SA20 White City Replacement Community Facility in 2019</b> )																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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	
SA Summary	+	+	+	0	+	++	+	0	0	0	+	+	+	0	+	+	++
<b>Sustainability Appraisal in 2019:</b>  The proposal is to replace the existing community facilities and therefore, neutral effects for housing and employment against SA Objective 18 and 12-13. The delivery of enhanced community facilities can 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. It is just within the outer boundary of the impact zone for the Robin's wood Hill quarry SSSI to the south; however, the replacement of the existing community centre is not considered to have any effects on the SSSI. The site is not known to contain any priority habitats or species, and development will not lead to fragmentation of ecological corridors; redevelopment could include biodiversity enhancements through provision of GI with the potential for minor positive effects but uncertain at this stage. There are playing fields and allotments nearby, so potential for linking with the wider GI network.  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 100% in FZ1 with no risk of flooding <sup>52</sup> indicating positive effects.  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																	

<sup>52</sup> <https://flood-map-for-planning.service.gov.uk/> [accessed March 2019]

does not decrease and ultimately continues to improve in Gloucester. The site is located within 800m of bus services 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; currently used as a community centre with the potential for major long-term positive effects against SA Objective 7 through reuse of developed land. At this stage, the Landscape/Townscape sensitivity of the site is unknown, however, as the site is 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 adjacent to the railway line to the south and there may be issues associated with noise and vibration for minor negative effects on the amenity of users 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 redevelopment will not lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 11.

The site is located near to services and facilities with the potential for a minor positive effect against SA Objective 14. The site is located within 800m of existing medical facilities potential for a minor positive effect against SA Objective 17. The site is located within 800m of Public Open Space with minor positive effects against SA Objectives 19-20. The site is within 800m of existing educational facilities with the potential for a minor long-term positive effect against SA Objective 24; redevelopment and maintaining provision of enhanced community facilities will have positive effects for both health and education.

Potential effects on cultural heritage (SA Objective 25) are likely to be major positive.

**SA Recommendations:**

- Consider requirement for ecological studies and any opportunities to provide biodiversity gain and links to the wider GI network
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<b>Site: West Quay</b> <b>Size &amp; Approx. Capacity:</b> 0.7 ha; 20 dwellings <b>Site Ref:</b> 55; SALA (progressed as <b>SA21 Part of West Quay, the Docks in 2019</b> for 20 dwellings)																
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic	Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & 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
<b>SA Summary</b>	0?	0	0?	0 +	++	+	0?	0	0	++	+	++	+	+	+	+
<b>Sustainability Appraisal in 2019:</b>  The site is being considered for 20 dwellings with the potential for minor long-term positive effects 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.  Alney Island Local Nature Reserve (LNR) is located about 150m <sup>53</sup> 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 affect ecological habitats in and around the LNR.  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. It is currently an urban site and provision of 20 dwellings could include biodiversity enhancements through provision of GI, especially with the blue spaces nearby at the docks and the River Severn and there may be opportunities for GI linkages - potential for positive effects but uncertainty at this stage until further studies undertaken.  The HRA identified that this site is within 200m of the s River Severn/Gloucester & Sharpness Canal that is connected to the River Severn and its wetlands; also, near to the River Severn and the Alney Island Local Nature Reserve (LNR) – that may be important functionally linked land for certain bird species such as the curlew and for which the Severn Estuary SPA/SAC/Ramsar are designated.  Vehicle access to the site would be along the Severn Road and Llanthony Road with likely increased traffic along these roads such that it is considered 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																

<sup>53</sup> <https://magic.defra.gov.uk/MagicMap.aspx> [accessed March 2019]

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 within an area of flood risk in FRZ2<sup>54</sup>. 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, but taking into account the capacity, it is considered that there is 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, 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 previously developed land, and with 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 effect against SA Objective 8 through redevelopment enhancements.

The site is located within an area of Principal Archaeological Interest, and within the Docks Conservation Area. There are two Listed Buildings within the site and the Dry Dock adjacent to the northern boundary of the site is listed. The Scheduled Monument Llanthony Secunda Priory is located some 170m to the south of the site. It is assumed that development will be sensitively and responsively designed to enhance the Conservation Area designation, designated heritage assets and their settings, 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.

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<sup>54</sup> <https://flood-map-for-planning.service.gov.uk/confirm-location?eastings=383697&northings=218521&placeOrPostcode=gloucester> [accessed March 2019]

The site is located within 800 metres 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 assess the effects of development at the site option on cultural heritage (SA Objective 25); however, the central location within the City Centre and historic docks area suggests that residents might use nearby cultural facilities with potential positive effects, some uncertainty at this stage.

**SA Recommendations:**

- Include requirement for ecological studies to identify opportunities for biodiversity gain on this site and to promote aims of the JCS GI Strategy, including possibilities with both green and blue spaces.
- Consider whether embedded policy mitigation is sufficient or whether any requirement for project level HRA
- Consider site specific requirement to protect water quality
- SUDS can be used to attenuate surfacewater and opportunities for integrating with biodiversity gain could be investigated
- Historic environment and townscape studies to ensure that the Scheduled Monuments, Listed Buildings and their settings are protected and enhanced where possible; and in line with design requirements for the Conservation Area
- Archaeological studies required to investigate significant interest in area

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**Gloucester City Plan 2011-2031  
Pre-Submission**

**Sustainability (Integrated) Appraisal Report  
EQUALITY & DIVERSITY IMPACT ASSESSMENT  
SCREENING REPORT**

**July 2019**

*enfusion*



**Gloucester City Plan 2011-2031  
Pre-Submission**

**EQUALITY & DIVERSITY IMPACT ASSESSMENT  
SCREENING REPORT**

**Sustainability (Integrated) Appraisal Report  
(Appendix V)**

<i>date:</i>	October 2016 Draft v02 July 2019 v03 updated	
<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 GCP sets out the spatial Vision and Objectives, with Policies and 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 2011-2031).

### Background

- 1.2 The GCP has been prepared to comply with national planning policy guidance using a range of evidence and taking into account responses made to consultations. 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 that seeks to improve the work of the Council and ensure that it meets with the requirements of the Equality Act 2010.
- 1.5 It is important to note that assessment of equality, diversity, and health/well-being (an important aspect of equality) has been detailed throughout the Sustainability (Integrated) Appraisal (SA) process. All aspects of the emerging GCP have been appraised against a SA framework including several SA objectives that directly and indirectly address equality, health and diversity, including: 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, Nos.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 GCP and are presented as Appendix V to the SA Report.

## Consultation

- 1.6 The initial EqlA Screening Report was included for consideration alongside the Draft Sustainability (Integrated) Appraisal (SA) Report and the Draft Gloucester City Plan for Regulation 18 public consultation early 2017. No comments were received on the draft EqlA. This EqlA Report comprises part of the SA Report accompanying the Draft GCP Pre-Submission on Regulation 19 consultation. Any comments received on this EqlA report will be submitted with the GCP and supporting evidence to the Secretary of State for independent examination by a planning inspector.

## Purpose and Structure of Report

- 1.7 The purpose of this Screening Report is to determine whether the 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 extant 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 Government<sup>1</sup> and the Gloucester City Council's People Impact Assessment Tool<sup>2</sup>, as applied across Gloucester, Cheltenham and Tewkesbury, and other guidance provided by the Department of Health.
- 2.5 An EqIA 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 it provides services and employment, and that where possible the Council does all it can to advance equality of opportunity between

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<sup>1</sup> 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/>

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

persons who share a relevant protected characteristic, and persons who do not.

- 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.

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

## 3.0 Equality and Diversity Impact Assessment Stage 1: Screening

### Introduction

- 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 emerging 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 & 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, the GCP 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 Report<sup>3</sup>, 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 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 Principles to help deliver the Vision. The proposed Vision and the Principles in the Draft GCP are as follows:

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

**GCP Vision:**

*“Between 2011 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.”*

**GCP Key Principles:**

- 1. 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. Ensure that new development is supported by the necessary infrastructure;*
- 3. Regenerate the city centre and other areas of the city in a way that responds to and meets the needs of the 21<sup>st</sup> Century and builds upon strengths such as heritage and the waterside location;*
- 4. Build on existing strength to create a distinctive, diverse and innovative cultural, arts, tourism and sporting offer;*
- 5. Encourage a vibrant and safe evening and night-time that appeals to all age groups and interests and encourages more overnight visitors;*

6. *Provide a balanced mix of new homes that provide for the needs and aspirations of the existing and future community;*
  7. *Encourage and facilitate inward and home-grown investment, attract innovative growth sectors, create high and stable levels of economic growth and productivity, and increase jobs and skills development opportunities;*
  8. *Improve educational attainment, skills and learning opportunities;*
  9. *Protect and enhance the city's leisure, recreation and environmental assets, including the historic environment, public open spaces, woods and trees, allotments, areas of nature conservation, sensitive landscapes, playing fields and sports facilities;*
  10. *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;*
  11. *Ensure that development minimises its impact on climate change through sustainable construction and design, encourages the use of sustainable forms of transport and integrates with and makes the most of existing infrastructure;*
  12. *Improve the health and wellbeing of communities through good design that promotes and prioritises active travel and active lifestyles, by providing access to good quality open spaces, playing fields, multi-functional green infrastructure and community facilities;*
  13. *Tackle poverty and deprivation in the worst affected areas of the city.*
- 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 sets out that at least 14,359 new dwellings will be required to meet Gloucester's needs over the plan period 2011 to 2031. Gloucester is unable to fully meet this need with an urban capacity for 7,685 new dwellings. The GCT JCS seeks to deliver the remainder of Gloucester's identified needs through strategic allocations/urban extensions. As of April 2019, 3,993 homes have already been delivered since 2011 and there are 2,339 commitments. 972 dwellings are proposed through the site allocations SA01- SA22 in GCP with a number of the bigger sites being central brownfield sites in need of regeneration. 620 new homes will be delivered through the Winneycroft Strategic Allocation south of Matson estate in Gloucester and 4,520 through the Strategic Allocations in Tewkesbury Borough allocated to meet Gloucester's housing need. A further 375 dwellings within these Strategic Allocation are projected to be delivered after 2031.
- 3.7 The Draft GCP includes Policies that set out the local requirements that development in the GCP area will have to meet. The Policies and Site allocations are as follows:

### **A: Housing**

- Policy A1: Effective use of land and buildings
- Policy A2: Affordable housing
- Policy A3: Regeneration of neighbourhoods and housing estates
- Policy A4: Student accommodation
- Policy A5: Housing choice for older people and supported and special needs housing
- Policy A6: Accessible and adaptable homes
- Policy A7: Self build and custom build homes
- Policy A8: Static caravan sites
- Policy A9: Extensions to existing dwellings
- Policy A10: Annexes to existing dwellings

### **B: Employment Development, Culture and Tourism**

- Policy B1: Employment & Skills Plans
- Policy B2: Safeguarding Employment Sites
- Policy B3: New Employment development & Intensification of existing employment uses
- Policy B4: Development within and adjacent to Gloucester Docks and canal
- Policy B5: Culture and Tourism
- Policy B6: Protection of public houses

### **C: Healthy Communities**

- Policy C1: Active design and accessibility
- Policy C2: Provision of Allotments
- Policy C3: Provision of open space
- Policy C4: Hot food takeaways
- Policy C5: Air quality
- Policy C6: Cordon sanitaire
- Policy C7: Fall prevention from taller buildings
- Policy C8: Changing places toilets

### **D: Historic Environment**

- Policy D1: Historic environment
- Policy D2: Recording and advancing understanding of heritage assets
- Policy D3: Buildings of local importance
- Policy D4: Shopfronts, shutters and signs
- Policy D5: Views of the Cathedral & Historic Places of Worship

### **E: Natural Environment**

- Policy E1: Landscape character and sensitivity
- Policy E2: Biodiversity & geodiversity
- Policy E3: Nature Recovery Area
- Policy E4: Trees, woodlands and hedgerows
- Policy E5: Green Infrastructure: building with nature
- Policy E6: Flooding, sustainable drainage & wastewater
- Policy E7: Renewable energy potential of River and Canal
- Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation

## **F: Design**

- Policy F1: Materials and finishes
- Policy F2: Landscape and planting
- Policy F3: Community safety
- Policy F4: Gulls
- Policy F5: Open plan estates
- Policy F6: Nationally prescribed space standards

## **G: Sustainable Living, Transport & Infrastructure**

- Policy G1: Sustainable transport
- Policy G2: Charging infrastructure for electric vehicles
- Policy G3: Cycling
- Policy G4: Walking
- Policy G5: Broadband connectivity
- Policy G6: Telecommunications infrastructure
- Policy G7: Water efficiency
- Policy G8 Review mechanism

## **Site Allocations SA01 - SA22**

### **Who implements or delivers the policy, service or function?**

- 3.8 Gloucester City Council is responsible for implementing the GCP. The Draft GCP is 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 key plans, programmes and policies that have influenced the GCT JCS and the Draft GCP in relation to equality. They include:

### **National**

- National Planning Policy Framework (NPPF) (2012, revised 2018)
- 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

### **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 have 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. The overarching strategic plan – the GCT JCS - includes an objective that 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 GCP Vision, Key Principles, and Policies were 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, and details are presented 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.

### **Key Principles**

- 3.18 Generally, the Principles will have a positive effect on all protected characteristics. In particular, 'Provide a balanced mix of new homes that provide for the needs and aspirations of the existing & future community', 'Improve educational attainment, skills and learning opportunities', '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', 'Tackle poverty and deprivation in the worst affected areas of the City', '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 'Improve health and wellbeing through good design that promotes opportunities for all residents to lead active lifestyles, by providing access to good quality open spaces, playing fields and community facilities' 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.
- 3.19 None of the Principles are biased towards one particular protected characteristic, although Principle 5 encourages a vibrant, safe evening economy that appeals to all age groups thus confirming strongly inclusive and positive effects for the protected group on age.

### **Gloucester City Plan Policies**

- 3.20 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.
- 3.21 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.
- 3.22 The historic and natural 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.
- 3.23 The assessment found that the all of the components of the plan will lead to likely positive effects on the protected characteristics with no negative effects being identified.

### **Monitoring**

- 3.24 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.
- 3.25 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 2011 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, Key Principles, 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 EqIA will not be required.
- 4.6 These findings will be subject to consultation comments from wider stakeholders alongside the Draft Gloucester City Plan and as part of the Sustainability (Integrated) Appraisal. Any comments received will be considered during the next stage of the GCP – submission and independent examination.

## EqIA Appendix I: Gloucester City Plan Equality and Diversity Impact Assessment – Plans & Programmes

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
<b>Strong and Prosperous Communities White Paper 2006</b>	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.
<b>Our Shared Future, 2007 (Commission on Integration and Cohesion)</b>	Our Shared Future sets out our practical proposals for building integration and cohesion at a local level.	<ul style="list-style-type: none"> <li>• Sense of shared futures</li> <li>• Emphasis on a new model of rights and responsibilities</li> <li>• New emphasis on mutual respect and civility</li> <li>• Deliver a visible social justice</li> </ul>
<b>Healthy lives, healthy people: our strategy for public health in England (2010)</b>	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.
<b>National Planning Policy Framework (NPPF) (2012, updated 2018)</b>	The national planning policy framework aims to reform the planning system to 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	Local Plans should set out strategic priorities to deliver: <ul style="list-style-type: none"> <li>■ To deliver a mix of housing based on current and future demographic 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);</li> <li>■ Consider the needs of people with disabilities by all modes of transport.</li> </ul>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	development. It provides a framework within which local people and authorities can produce local and neighbourhood plans.	
<b>Planning for Travellers 2015</b>	The document sets out the proposed new, single Planning Policy for traveller sites.	<p>The new policy aims to:</p> <ul style="list-style-type: none"> <li>▪ enable local planning authorities to make their own assessment to set their own pitch/plot targets</li> <li>▪ encourage local planning authorities to plan for sites over a reasonable timescale</li> <li>▪ protect Green Belt from development</li> <li>▪ reduce tensions between settled and traveller communities in the planning system</li> <li>▪ remove repetition of national planning policy that is set out elsewhere</li> <li>▪ ensure that local planning authorities, working together, have fair and effective strategies to meet need through the identification of land for sites</li> <li>▪ promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites</li> <li>▪ reduce the number of unauthorised developments and encampments and make enforcement more effective if local planning authorities have had regard to this policy</li> <li>▪ 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</li> <li>▪ enable provision of suitable accommodation from which travellers can access education, health, and welfare and employment infrastructure.</li> </ul>
<b>Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society 2008</b>	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	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

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	forecasted unsustainable pressures on homes, health and social care services.	coherent, joined-up, plan – that is why we need a National Strategy for Housing in an Ageing Society.
<b>Gloucester’s Housing &amp; Homelessness Strategy 2015-2020</b>	Strategy sets out plans for ensuring new homes are delivered and improving existing homes and services within the neighbourhoods of the City.	Objective 1- Increase the availability & quality of homes Objective 2- Have the right type of homes available for City residents Objective 3- Prevent homelessness Objective 4- Foster good community health & wellbeing
<b>Gloucester’s Cultural Vision &amp; Strategy 2016-2026</b>	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
<b>Leadership Gloucestershire</b>  TOR updated February 2018	Leadership Gloucestershire (LG) brings together public sector organisations 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.	<ul style="list-style-type: none"> <li>■ Gloucestershire Health &amp; Wellbeing Board - To oversee the effective functioning of the Gloucestershire Health and Wellbeing Board</li> <li>■ Driving economic Growth - To work with the Gloucestershire Local Enterprise Partnership (LEP) to ensure they lead and champion the economic growth agenda.</li> <li>■ 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.</li> <li>■ Planning and Infrastructure - The adoption of a “Gloucestershire family” approach to planning and infrastructure development.</li> <li>■ Assets - The development of a “One Gloucestershire” approach to assets/estates.</li> <li>■ Shared Services - To oversee the public sector approach to shared services.</li> <li>■ Troubled Families/Community Budgets - To oversee the development of the Troubled Families/Community Budget initiatives.</li> </ul>



Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
		<ul style="list-style-type: none"> <li>■ Promoting Gloucestershire - To promote Gloucestershire and the agreed priorities.</li> </ul>
<p><b>Gloucester City Vision 2012 - 2022</b></p>	<p>The City Vision lays out 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.</p>	<p>Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy.</p> <p>Aims:</p> <ul style="list-style-type: none"> <li>● A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors.</li> <li>● A vibrant evening economy.</li> <li>● A City which improves through regeneration and development.</li> <li>● A City where people feel safe and happy in their community.</li> <li>● A healthy City with opportunities available to all.</li> </ul>
<p><b>Gloucestershire Health and wellbeing Strategy 2012 – 2032 – Fit for The Future</b></p>	<p>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.</p>	<p>Uses the life-course approach:</p> <ul style="list-style-type: none"> <li>■ Starting well – with a focus on pregnancy and early years to give every child the best start in life</li> <li>■ Developing Well – a focus on children and young people maximising their capabilities and control over their own lives</li> <li>■ 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</li> <li>■ Ageing Well – promoting independence, physical and mental health and wellbeing post-retirement.</li> </ul> <p>Under each of the above headings it sets aspirations to achieve in the Gloucestershire area.</p>
<p><b>YOUR HEALTH, YOUR CARE Our five-year vision for Health and Social Care</b></p>	<p>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</p>	<p>The vision for Gloucestershire Health Community is to have:</p> <ul style="list-style-type: none"> <li>■ Joined up care for the people of Gloucestershire</li> <li>■ People empowered to take more control over their own care</li> <li>■ Mainstream services that are accessible by all vulnerable people, wherever they may live</li> </ul>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	to improve the quality of life for everyone in Gloucestershire.	<ul style="list-style-type: none"> <li>■ Enhanced outcomes for the population</li> <li>■ Improved use of resources</li> </ul>
<b>Gloucestershire Children and Young People's Partnership Plan 2015-2018</b>	'To ensure our children and young people thrive and reach their full potential; providing appropriate support for those families who need it most'	<p>Our vulnerable children, young people and families have an entitlement to Early Help; Targeted Interventions and for some, Intensive Intervention to:</p> <ul style="list-style-type: none"> <li>■ Enjoy the best start in life</li> <li>■ Maximize their capabilities and have control over their own lives</li> <li>■ Be safe from injury, exploitation and harm</li> <li>■ Work well together to provide right and timely effective intervention for vulnerable children and families as early as possible</li> </ul>
<b>Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Adopted December 2017</b>	The document outlines the strategic 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

## Appendix II: Equality and Diversity Impact Assessment (EqIA)

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### 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 & Key Principles

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
<b>Vision</b>	+	+	+	+	+	+	+	+	+
<p>The vision should benefit all groups as it seeks to provide a place where a good quality of life is open to all - where people feel safe &amp; happy in their community and are proud to live &amp; work. 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.</p>									

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
<b>GCP Key Principles</b>									
1 Efficient use of land & buildings	+	+	+	+	+	+	+	+	+
2 Necessary infrastructure support	+	+	+	+	+	+	+	+	+

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
3 Regenerate Centre for 21 <sup>st</sup> Century	+	+	+	+	+	+	+	+	+
4 Build on strengths	+	+	+	+	+	+	+	+	+
5 Vibrant & safe evening economy	+	+	+	+	+	+	+	+	+
6 Balanced mix of homes	+	+	+	+	+	+	+	+	+
7 Encourage investment	+	+	+	+	+	+	+	+	+
8 Improve education & skills	+	+	+	+	+	+	+	+	+
9 Protect leisure & env assets	+	+	+	+	+	+	+	+	+
10 High quality design	+	+	+	+	+	+	+	+	+
11 Minimise impacts climate change	+	+	+	+	+	+	+	+	+
12 Improve health & wellbeing	+	+	+	+	+	+	+	+	+
13 Tackle poverty & deprivation	+	+	+	+	+	+	+	+	+
<p>Generally, the Key Principles will have a positive effect on all protected characteristics. In particular, 'Provide a balanced mix of new homes that provide for the needs and aspirations of the existing &amp; future community', 'Improve educational attainment, skills and learning opportunities', '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', 'Tackle poverty and deprivation in the worst affected areas of the City', '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 'Improve health and wellbeing through good design that promotes opportunities for all residents to lead active lifestyles, by providing</p>									

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
<p>access to good quality open spaces, playing fields and community facilities' 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.</p> <p>None of the Principles are biased towards one particular protected characteristic, although Principle 5 encourages a vibrant, safe evening economy that appeals to all age groups thus confirming strongly inclusive and positive effects for the protected group on age.</p>									

## Policies

GCP Sections Policies	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
<b>A: Housing (A1-A10) &amp; Site Allocations SA01-SA22</b>	+	+	+	+	+	+	+	+	+
<p>The housing policies should benefit all groups overall as they seek to increase the availability and quality of housing in the City; particular positive effects for Policy A4 Student Accommodation &amp; Policy A5 Specialist Housing - choice for older, frail &amp; disabled people with regard to protected characteristics for age and disability. Also, Policy A6 on accessible &amp; adaptable housing.</p>									
<b>B: Employment Development, Culture &amp; Tourism (B1-B6)</b>	+	+	+	+	+	+	+	+	+
<p>Overall these policies have benefits for all groups and protected characteristics as employment is known to have positive effects on health and well-being; further positive benefits for all groups through increasing accessibility in the City.</p>									
<b>C: Healthy Communities (C1-C8)</b>	+	+	+	+	+	+	+	+	+
<p>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. The 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.</p>									

GCP Sections Policies	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
<b>EqIA Protected Characteristics</b>									
<b>D: Historic Environment (D1-D5)</b>	+	+	+	+	+	+	+	+	+
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.									
<b>E: Natural Environment (E1-E8)</b>	+	+	+	+	+	+	+	+	+
These Policies are likely to lead to positive effects on the protected characteristics as they aim to protect the environment in which the protected groups live. This can have benefits in terms of health and well-being for all groups. They also aim to enhance the environment in which the protected groups live and support healthy functioning ecosystems on which people depend.									
<b>F: Design (F1-F6)</b>	+	+	+	+	+	+	+	+	+
The 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.									
<b>G: Sustainable Living, Transport &amp; Infrastructure (G1-G8)</b>	+	+	+	+	+	+	+	+	+
Overall these policies should have positive benefits for all groups through increasing accessibility and movement in City.									



## Appendix Vi: IA (SA, EqIA, and HRA) Consultation Representations

### Regulation 18 Consultation Representations to Integrated Appraisal (IA) Report (October 2016)

Please note that many of these comments are now superseded as the examination into the GCT JCS has been completed, the JCS found sound, and adopted (December 2017).

Consultee Section of IA Report	Consultee Comments	Responses & Actions Taken
<b>Natural England (NE)</b>		
<p>HRA Screening: Cotswold Beechwoods SAC</p>	<p>The Gloucester City Plan area is 2.4km from the Cotswold Beechwoods Special Area of Conservation (SAC) and it allocates sites for the development of 14,350 dwellings. There is growing awareness of the potential for growth across Stroud District, Tewkesbury Borough, Gloucester City and the Cotswolds Borough to result in additional recreational pressures on the Cotswold Beechwoods SAC. Natural England is at the start of a process to better understand the nature and scale of these potential impacts, and what action, if any, is required. Due to the nature of this issue, we will be working closely with the relevant Local Authorities mentioned above.</p> <p>The Habitat Regulations Assessment Screening (HRA) screens out likely significant effects on the Cotswold Beechwoods SAC as a result of increased recreational pressures. The reasons for screening impacts out are the local scale of the proposed development sites and the mitigation provided by policies, particularly policies D5: Open Space and F5: Green Infrastructure, which aim to protect and enhance assets. Natural England does not currently agree with this conclusion.</p> <p>As of yet there is no established 'zone of influence' for recreational pressures on the Cotswold Beechwoods SAC or an evidence based understanding of what scale of development would trigger impacts. However, as the plan area is only 2.4km from the SAC and allocates 14,350 dwellings, we do not agree with ruling out impacts based on their local scale and nature.</p> <p>The delivery of local and strategic green infrastructure (GI) that provides for local recreational needs offers a potential route for mitigation, and avoiding impacts on the</p>	<p>Comments noted with thanks.</p> <p>The JCS authorities and NE have continued to discuss this matter through the concluding period of the GCT JCS examination in 2017, and subsequently through 2018 into 2019.</p> <p>The HRA Report accompanying the Pre-Submission GCP has been updated to take account of the modifications and adoption of the JCS (December 2017) and revised to take account of recent case law including the Sweetman CJEU (April 2018) that has changed the way in which HRAs are undertaken in the UK.</p>

<b>Consultee Section of IA Report</b>	<b>Consultee Comments</b>	<b>Responses &amp; Actions Taken</b>
	<p>SAC. However, as it stands there is no reference to the Cotswold Beechwoods SAC or the recreational pressures it could experience in the Gloucester City Plan. We recommend revisiting policy F5: Green Infrastructure and the supporting text to highlight this critical role. If there are individual development allocations that have the potential to deliver specific GI priorities, then these should be referred to in the policies for that development. For example, the Joint Core Strategy Green Infrastructure Strategy (June 14) highlights the potential for connections to the river, the Severn and Washlands Nature Improvement Area, the Leadon Valley Project and Robinswood Hill. The plan should also make it clear that development proposals may be subject to Habitat Regulations Assessment Screening. Your HRA Screening also refers to the Joint Core Strategy (JCS) for Cheltenham, Gloucester and Tewkesbury. The JCS policies set out a route for possible mitigation, through green infrastructure and developer contributions towards site management. However, the delivery of these measures has not been progressed and therefore the mitigation has not been secured. We therefore do not consider that the JCS policies provide mitigation. Mitigation needs to be secured either on a case by case basis through individual plans and projects or, ideally, through a strategic project to deliver a landscape scale solution. This necessitates further work to establish the nature and scale of impacts and an appropriate mitigation plan. As part of the examination for the JCS, Natural England has discussed this with the local authorities and they have committed to working together, and with other local authorities, to address this issues (see the agreed statement of common ground with Natural England). We recommend that the Local Authorities now start this process.</p>	
<p>HRA Screening: Severn Estuary SAC, SPA, Ramsar</p>	<p>There is a growing awareness of the potential for recreational pressures to impact on the Severn Estuary Special Area of Conservation (SAC) / Special Protection Area (SPA) / Ramsar site, particularly on the bird populations for which the SPA and Ramsar site are designated. Whilst the site's designated boundaries are some distance away (8.1km), the Gloucester City Plan area abuts the River Severn. Your Habitat Regulations Assessment Screening (HRA) screens out likely significant effects on the Severn Estuary as a result of increased recreational pressures. The reasons for screening impacts out are the distance to the site and the mitigation provided by policies. Natural England does not currently agree</p>	<p>Noted with thanks and as above with regard to the updating and revision of the HRA report to address comments, progress with the GCT JCS, and to take account of recent CJEU's.</p>

Consultee Section of IA Report	Consultee Comments	Responses & Actions Taken
	<p>with this conclusion. SPA / Ramsar birds continue using the estuary and river beyond the designation. The river is functionally linked to the designated site and the life and productivity of the SPA birds. It is the corridor that they use for migrations and to reach functionally linked land, e.g. Ashleworth Ham. Alney Island, which lies immediately to the west of the Gloucester City Plan area, is thought to be a key wetland and stepping stone along the river. Therefore recreational impacts on the river and on supporting sites such as Alney Island, which are much closer to the Plan area, have the potential to have adverse effects on the European site.</p> <p>As of yet there is no established 'zone of influence' for recreational pressures on the Severn Estuary SAC/SPA/Ramsar site in Gloucester City or an evidence based understanding of what scale of development would trigger impacts. For your information, Stroud District Council recently commissioned visitor surveys in order to better understand recreational pressures on the Severn Estuary. As a result, they have established a 7.7km buffer within which there may be adverse effects on integrity, without appropriate mitigation. This survey is specific to Stroud, and therefore its findings can't be readily applied elsewhere. However, it does underline that recreational impacts on the estuary seem to come from a wide area. Gloucester City Council should consider the need to undertake a similar recreational impacts study, in order to inform decisions on the HRA of plans and projects and ensure there are no adverse impacts on this European site.</p>	
<b>Environment Agency</b>		
SA	<p>We have no specific comments on the SA at this stage. Generally, we would advise that the SA should reflect the issues highlighted in the Plan. If there are particular omissions in the Plan, this should be highlighted within the SA. So for example the lack of Level 2 SFRA at this stage would be an aspect that should be highlighted within the SA as affecting the sustainability of the Plan due to the lack of evidence base. Given we understand that work is on-going on this we have not commented in detail on the SA, but we would do in future to support an objection to the Plan if there were to be similar omissions at the next formal stage.</p>	Understood and noted with thanks.
HRA	We have no specific comments on the HRA at this stage. We have not made a detailed	Understood and noted with

Consultee Section of IA Report	Consultee Comments	Responses & Actions Taken
	review as we would anticipate NE would lead on comments on the HRA. We would at this stage highlight that we referred to the HRA in our comments on foul drainage infrastructure/IDP as part of the JCS process. We may make similar comments on HRA on this aspect in the future if insufficient evidence base exists to identify that there will be appropriate delivery of foul drainage infrastructure in a timely manner to deliver sustainable development.	thanks.
<b>Historic England</b>		
	No comments on the SA or HRA at this stage.	
<b>Gloucestershire County Council</b>		
	No comments on the SA or HRA at this stage.	
<b>Gloucestershire County Council</b>		
HRA para 3.15 & Appendix IV	Habitats Regulations Assessment (HRA)– it could be questioned whether increased development in Gloucester could actually result in significant increases in recreational disturbance on the Cotswold Beechwoods but particularly the Severn Estuary which has features which are more susceptible to such an effect. Reference in the next version of the HRA to the findings of the recent Stroud District Study would be useful as the draft City Plan progresses with more firmed up site allocations and the HRA is updated. The Severn Estuary Visitor Study can be found at <a href="https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/evidence-base/environmental-evidence">https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/evidence-base/environmental-evidence</a> .	Noted with thanks
<b>Persimmon Homes Severn Valley</b>		
SA Table 2.1 SA Framework	The Sustainability Appraisal sets out in Table 2.1 a SA Framework, but this is not used to develop a framework to appraise each policy individually or each allocation in detail. Instead Section 5, the Integrated Appraisal of the Plan provides only a prose description of the impacts on policies, site allocations, cumulative effects and interrelationships.	The SA Framework was developed in detail from the strategic level SA Framework used to assess the emerging draft elements of the JCS. Thus it demonstrates continuity and conformity but also details

Consultee Section of IA Report	Consultee Comments	Responses & Actions Taken
		thresholds of significance for each SA objective that are relevant to a Local Plan and local site options/allocations. Further details of the assessment will be reported in the next stage of IA – Pre-Submission & Regulation 19 consultation.
<b>User deleted GDPR</b>		
GCP Sustainability Appraisal	Making better use of the waterways and river corridors, including improving flood mitigation and biodiversity resources. Herefordshire & Gloucestershire Canal Trust would have preferred that the scheme was mentioned in the GCT so that it can gauge both public opinion and inform others of the plans.	Noted.
<b>Robert Hitchins Limited – Pegasus Planning Group</b>		
SA Site options	Land at Mill Place and Land off Rudloe Road have not been subject to Sustainability Appraisal by the DGCP. It is submitted that for the next round of DGCP public consultation that both the submitted sites, Land at Mill Place and Land off Rudloe Drive, should be the subject of SA and should be included as sites that have the potential to deliver against the City's housing requirement in the plan period 2011-2031.	All site options that are considered to be reasonable alternatives (suitable & deliverable) through the sites assessment process will be subject to SA.
<b>User deleted GDPR</b>		
SA PP Review	There is lack of clarity over what document the policy is seeking to implement, either the Gloucestershire County Council Green Infrastructure Plan or the JCS Green Infrastructure Strategy. Also we note that neither document is identified in the Sustainability Appraisal list of key plans and programmes.	The PP review has been updated for the Pre-Submission SA work.