



**GLOUCESTER CITY PLAN  
2011-2031**

**SUSTAINABILITY (INTEGRATED)  
APPRAISAL**

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

**NON-TECHNICAL SUMMARY**

**July 2019**

enfusion



## 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, EqlA 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, EqlA 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.