

**GLOUCESTER LOCAL DEVELOPMENT
FRAMEWORK**

**SUSTAINABILITY APPRAISAL OF THE
REVISED DRAFT PLANNING BRIEF:**

‘GREATER BLACKFRIARS’

SEPTEMBER 2007

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1. INTRODUCTION

- 1.1 As part of the emerging Local Development Framework for Gloucester, we have prepared a revised draft Planning Brief for the Greater Blackfriars Area. The extent of this area is shown on the plan attached at Appendix 1.
- 1.2 The purpose of the brief is to guide the future redevelopment of the Greater Blackfriars area by setting out in detail, preferred land uses, any potential constraints to development and the key principles that any development proposal will need to take account of. Further detail on the content of the brief is set out in Section 4.0
- 1.3 This document is a 'Sustainability Appraisal' of the revised draft Greater Blackfriars Planning Brief, which looks at how well it performs in social, economic and environmental terms and considers how the changes made to the original draft brief have made it more, or less sustainable. In other words, to identify the extent to which it meets social, economic and environmental objectives.
- 1.4 The appraisal helps us to identify what level of impact the revised planning brief is likely to have, whether its impacts will be significant, temporary or permanent and whether it is likely to have any impact beyond the boundaries of Gloucester.
- 1.5 The appraisal helps us to identify how the brief might be improved to make it more effective in sustainability terms. It also helps us to identify and address any potential conflicts between different sustainability objectives, for example the need to provide safe, affordable housing, which may conflict with the need to reduce the consumption of raw materials.
- 1.6 This document is divided into a number of sections for ease of reference. Section 3 outlines in more detail the nature of the sustainability appraisal process which has been carried out, Section 4 outlines the content and purpose of the brief in more detail, Section 5 describes relevant baseline data and Section 6 describes the main findings of the appraisal process.

- 1.7 Section 7 considers the 'do-nothing' or business as usual scenario, in other words, what would be the effect of not having the brief in place and Section 8 flags up any comments and suggested improvements that could be made to the draft brief to improve its performance in sustainability terms.
- 1.8 Attached to the appraisal at Appendix 2 is a completed 'Sustainability Appraisal Matrix' setting out in detail the predicted impact of the brief when set against a series of sustainability sub-objectives (the use of this matrix is explained in more detail in Section 3 below).
- 1.9 The sustainability appraisal has been carried out to assist people in making comments on the draft brief itself. The deadline for comments on this document is the same as the deadline for submitting comments on the revised draft SPD i.e. **12th November 2007**.
- 1.10 Comments should be sent to:
- Planning Policy Team
Gloucester City Council
Herbert Warehouse
The Docks
Gloucester
GL1 2EQ
- 1.11 Comments can also be submitted electronically using the following email address: pdcc@gloucester.gov.uk or by logging onto the Council's website at www.gloucester.gov.uk
- 1.12 If you have any questions about this document or the revised draft Planning Brief to which it relates please call 01452 396854 for assistance.

2. BACKGROUND

- 2.1 The Council is in the process of preparing a Local Development Framework for Gloucester (LDF). This will replace the existing Local Plan. The LDF will consist of four main development plan documents including:
- Core Strategy
 - Development Control Policies
 - Central Area Action Plan; and
 - Site Allocations/Designations (Non-Central Area)
- 2.2 These documents will be accompanied by a Proposals Map showing graphically each policy and proposal.
- 2.3 Supporting these main Development Plan Documents will be seven site-specific Planning Briefs, which will be Supplementary Planning Documents or SPDs. These include:
- The Railway Corridor
 - Kings Square/Bus Station
 - Greater Greyfriars
 - Greater Blackfriars
 - Westgate Island and Quay
 - Land at Clearwater Drive; and
 - Land East of Waterwells
- 2.4 The purpose of these documents is to support and provide additional information on a number of draft land use allocations set out in the Central Area Action Plan and Site Allocations and Designations (Non-Central Area) documents referred to above.
- 2.5 Supplementary Planning Documents do not have the same status as Development Plan Documents but they are nonetheless very important considerations when planning applications are being decided.
- 2.6 This is the sustainability appraisal of the Greater Blackfriars Planning Brief. It builds on a previous sustainability appraisal carried out in August 2006.
- 2.7 Further appraisals of the other planning briefs listed above are available to view and comment on separately.

3. THE SUSTAINABILITY APPRAISAL PROCESS

What is 'Sustainability'?

- 3.1 There is no single definition of sustainability. A commonly used definition, which has been around since 1987 is:

'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs'.

- 3.2 More recently, it has been accepted that sustainable development isn't just about protecting the environment, but that it also includes social and economic objectives.

- 3.3 In particular, the Government acknowledges sustainable development as having four main aims:

- Social progress which recognises the needs of everyone
- Effective protection of the environment
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment

So how will we appraise the 'sustainability' of our SPDs?

- 3.4 On July 28th 2005, the Council approved a Sustainability Appraisal 'Scoping Report' which sets out the broad approach that the Council will take in subjecting each of the documents produced under the Local Development Framework, to a Sustainability Appraisal. The Scoping Report, plus a non-technical summary, is available to download online at www.gloucester.gov.uk
- 3.5 Hard copies may also be viewed and/or purchased from the City Council Offices.
- 3.6 The Scoping Report was subject to consultation with the Environment Agency, the Countryside Agency, English Nature, English Heritage and a number of other relevant organisations. It identifies the main national, regional and local policy influences on Gloucester as well as the current baseline state of the City in environmental, social and economic terms. From this assessment, the scoping report draws out the key issues facing Gloucester and translates these into a number of sustainable objectives.

3.7 Key sustainability issues identified for Gloucester include:

Economic Issues

- The highest unemployment rate in the County
- Pronounced unemployment among black and minority ethnic communities
- Lower than County average household income
- Growth in the service sector and a decline in manufacturing
- High levels of in-commuting
- Limited early hours/evening economy
- Overall shortage of employment land
- Older, less attractive employment areas
- Lack of overnight tourist visitors
- Poor retail provision compared to the size of Gloucester's shopper population

Social Issues

- An acute housing 'need'
- Poorer than average health of residents
- 'Pockets' of acute deprivation in some parts of the City
- Growth in the number of households in particular single person households
- Gloucester has the second highest crime rate in the South West
- Educational achievement is the lowest in the County
- Poor literacy and numeracy skills
- A significant percentage of homes classified as 'unfit'
- Homelessness
- Gloucester has the highest teenage pregnancy rate in the South West

Environmental Issues

- Many of the un-built parts of the City are of significant landscape and/or nature conservation importance
- A large proportion of the City falls within the River Severn floodplain
- Gloucester has an important built and cultural heritage
- Certain areas of the City suffer from traffic congestion
- Previously developed land may be subject to contamination
- The City has a shortfall of public open space compared to the national recommended standard
- Lower than average rates of recycling

3.8 Based on these identified key issues, we have identified nine 'headline' sustainable objectives, which we will expect all LDF policies and proposals to be consistent with as far as possible. Where there are potential conflicts, these will be highlighted through the appraisal process.

- 3.9 Our nine headline objectives are also based on the objectives of the Regional Sustainable Development Framework for the South West (2001) or RSDF for short.
- 3.10 They include:
1. Protecting the City's most vulnerable assets
 2. Delivering sustainable economic growth
 3. Minimising consumption of natural resources and the production of waste
 4. Ensuring everyone has access to the essential services they require and that local needs are met
 5. Improving standards of health and education
 6. Making Gloucester a great place to live and work
 7. Reducing the need to travel
 8. Improving environmental quality (air, water, land)
 9. Reducing contributions to climate change
- 3.11 Under each of these headline objectives we have identified a number of sub-objectives, which are more detailed questions that will be asked of potential policies and proposals during the sustainability appraisal process.
- 3.12 For example, under headline objective 1, which is to protect the City's most vulnerable assets, a policy or proposal would be assessed in terms of whether it would minimise the risk of flooding, help to conserve and/or enhance natural habitats, conserve and/or enhance species biodiversity, maintain and/or enhance cultural and historic assets and so on.
- 3.13 Under headline objective 5, which is to improve standards of health and education, a policy or proposal would be assessed in terms of how well it would contribute towards improve health and enhancing people's ability to engage in healthy activities as well as whether it would improve access to health care facilities or improve access to opportunities for learning, training, skills and knowledge.

- 3.14 Clearly some objectives will be more relevant to certain policies and proposals than others. Thus for example a policy relating to the provision of affordable housing is unlikely to have much a direct impact in terms of nature conservation (unless it relates to a particular site with nature conservation value). Such a policy would however be directly related to the sustainable objective of ensuring that everyone has access to safe and affordable housing.
- 3.15 It is also important to remember that there may be less obvious linkages between policies and sustainability objectives. A good example is the link between design and reducing crime levels, which is not immediately obvious, however evidence suggests that it is possible through the use of good design to reduce the opportunity to commit crime e.g. by providing overlooking, good lighting and reducing the number of 'escape routes' available.
- 3.16 We have identified these less obvious linkages wherever possible.
- 3.17 The headline objectives and sub-objectives set out in the Scoping Report have been incorporated into a 'Sustainability Matrix' which is essentially a table of criteria that has been applied to each Planning Brief in order to determine how well it performs in sustainability terms.
- 3.18 The completed sustainability matrix is set out at Appendix 2 of this document. The matrix looks at the likelihood of any impact, the likely timescale, whether the effect will be temporary or permanent, significant and/or cumulative and whether the impact will be localised, citywide or even cross-boundary. The impact of each option has been scored on the following basis:
- | | |
|----|-----------------------------|
| ++ | Significant positive effect |
| + | Moderate positive effect |
| 0 | Neutral effect |
| -- | Significant negative effect |
| - | Moderate negative effect |
| ? | Uncertain effect |
- 3.19 Commentary on the main findings of the appraisal is set out in Sections 6, 7 and 8 below.

4. THE PLANNING BRIEF

- 4.1 The purpose of the Planning Brief is to guide the future development of the Greater Blackfriars area. It sets out the requirements of the City Council and other service providers in relation to the redevelopment of the site – either in part or as a whole.
- 4.2 The Greater Blackfriars area is allocated in the ‘Central Area Action Plan’ (preferred options) Development Plan Document under Policy CA19.
- 4.3 In particular, the area is allocated for mixed-use development including office development, retail, 4* hotel with conference facilities, leisure and cultural uses including a theatre, A3 uses (restaurants and cafes) A4 uses (drinking establishments) and parking.
- 4.4 Indicative capacities are as follows:
- 300 dwellings
 - Small-scale retail – 4,000 sq. m
 - A3 and A4 (Bars and Restaurants) – 4,800 sq. m
 - Offices – 18,000 sq. m
 - Hotel – 5,500 sq. m
 - Theatre – 8,500 sq. m
- 4.5 The revised Planning Brief stipulates a number of obligations for the redevelopment of the site, including enhancements to the setting of the Priory through the provision of a public open space around Blackfriars, improved pedestrian linkages to the Quay, Greyfriars and the Docks, downgrading of the function of the Quay as a route for vehicular traffic and contributions towards the creation of a riverside walk. A new requirement has been added concerning the submission of an archaeological assessment as part of any planning application.

5. RELEVANT BASELINE INFORMATION

Site-Specific Baseline Information

- 5.1 The site exhibits a number of land uses, perhaps the most prevalent in area terms being surface car parking. In addition there is the prison and associated accommodation, Shire Hall, the Police Station, Crown and Magistrates Courts, the Blackfriars Friary and grounds, hotels, retail and commercial offices as well as a place of worship.
- 5.2 The brief area contains a number of listed buildings, particularly along the frontages of Southgate Street and Westgate Street, but also including Ladybellegate House, Shire Hall and Blackfriars Friary, Bearland House, Bearland Lodge and the Crown Courts.
- 5.3 The site falls within two Conservation Areas; Conservation Area 5 – The City Centre and Conservation Area 6 – The Barbican.
- 5.4 The whole area lies within an Area of Principal Archaeological Interest. There are a number of Scheduled Monuments, namely Blackfriars, four individual elements of the Glevum Roman Coloniae, Mercers Hall and Robert Raikes House.

Central Area Baseline Information

- 5.5 The Planning Brief is located within the Central Area. The Central Area Action Plan DPD includes a detailed baseline appraisal of the Central Area. Some of the main findings are summarised below.

Population

- The Central Area has a resident population of approximately 5,000. This represents 4.5% of the City total.
- The average population density for Gloucester is 27 people per hectare. Within the Central Area this falls to about 14.5 people per hectare. This compares to an average of 35 people per hectare in Bristol and 25 people per hectare in Cheltenham.

Ethnicity

- The Central Area is characterised by a diverse population. The percentage of the non-white population in Westgate Ward is 10.3% compared to 7.5% for the City as a whole.

Housing

- Rates of home ownership in the Central Area are lower than average. Just 39.3% of households in Westgate Ward are owner-occupied compared to 74.7% for Gloucester as a whole, 74.3% for Gloucestershire and 73.1% for the South West.
- Conversely, the percentage of rented households in the Central Area is significantly higher than average. 60.7% of households are rented compared to 25.3% for Gloucester as a whole, 25.7% for Gloucestershire and 26.9% for the South West.
- In terms of the types of housing within the Central Area, a much greater percentage of people in the Central Area live in a flat, maisonette or apartment - 65.5% compared to 15% for Gloucester as a whole.
- Nearly a quarter of households in Westgate Ward (21.6%) are classified as being overcrowded (i.e. not enough bedrooms for the number and age of people living there). This compares to 6% for Gloucester as a whole and 4.5% for Gloucestershire and 5% for the southwest.
- There are a large number of single person households in the Central Area. In Westgate Ward, 59% of all households are occupied by single persons, compared to 30.2% for Gloucester as a whole. This helps to bring the average household size in Westgate down to 1.72 compared to 2.37 for Gloucester as a whole.

Car Ownership

- Rates of car ownership in the Central Area are much lower than the City, County and Regional averages. In Westgate Ward, 49.1% of households do not have a car/van compared to 24.2% for Gloucester and 18.7% for Gloucestershire.

Employment & Economic Activity

- The rate of economic activity in the Central Area is lower than average. The rate for Westgate Ward is 64.3% compared to 71.03% for Gloucester and 70.26% for Gloucestershire as a whole.
- The unemployment rate in Westgate is much higher at 11% compared to 4.78% for Gloucester and 3.66% for Gloucestershire. The rate of long-term unemployed is also higher.

Health

- The Central Area has a higher than average percentage of people who describe themselves as having a limiting long-term illness - 23.7% for Westgate Ward compared to 16.9% for Gloucester and 16.1% for Gloucestershire.
- Those who consider their health to be 'not good' is higher at 13.9% for Westgate compared to 8.6% for Gloucester and 7.6% for Gloucestershire.

Deprivation & Poverty

- There are 8,414 wards in England and 146 wards in Gloucestershire. Westgate ward is the second most deprived ward in Gloucestershire and is ranked nationally at 718.
- In terms of poverty, Westgate Ward ranks second in the County in terms of fuel poverty. A household is in fuel poverty if it cannot afford to keep its home warm. 32% of households in Westgate Ward are classified as being in fuel poverty.

Crime

- Rates of crime in Westgate are higher than the City and County averages. For domestic burglaries, the rate in 2003-2004 for Westgate was nearly double the City average and nearly three times the County average. Thefts of motor vehicles were also much higher than the City and County averages. (source: MAIDeN project).
- Particularly pronounced however were thefts from vehicles and violent crimes both of which were significantly higher than the City and County averages during 2003/4 (source: MAIDeN project).

Education

- In terms of education and qualifications, Westgate ward is generally comparable to the rest of Gloucester but rates of achievement are lower than the County average (source: MAIDeN project).
- In 2004 however, the percentage of children achieving low scores for key stage 1, 2 and 3 tests was higher than both the City and County averages (source: MAIDeN project).

6. OVERALL FINDINGS

- 6.1 The revised planning brief performs very well in sustainability terms when assessed using the Sustainability Appraisal Matrix.
- 6.2 Although the scale of the proposal means that there will be an inevitable increase in the consumption of raw materials, generation of waste and consumption of water, these are to a large extent, considered to be inevitable consequences of development.
- 6.3 Importantly, the revised brief requires new development to take into account the issue of waste generation through the submission of a waste minimisation statement. This will help to reduce the level of impact. Requiring development to achieve the Level 3 Code for Sustainable Homes rating will help to reduce the environmental impact of development.
- 6.4 Parts of the planning brief area are located within the floodplain. The brief requires however a flood risk assessment and any mitigation as is necessary. The revised brief has been amended to stipulate a requirement for a contribution to be made towards flood risk mitigation and encourages any development to consider the incorporation of improvements to the flood barrier along the Quay. This should help to reduce the potential impact of flooding.
- 6.5 The central location of the site right in the heart of the City Centre means that it is accessible to a range of shops and services, will encourage non-car modes of transport such as walking and cycling and will help to enhance the vitality of the City Centre.
- 6.6 The re-use of the Priory and other historic buildings in the area provides the opportunity to maintain and enhance the area's historic and cultural assets. Additional reference in the revised planning brief has been made to the historic environment.
- 6.7 The brief will also provide new, modern cultural facilities, which will help increase participation in cultural activities and potentially contribute towards greater involvement in community activities. The revised brief now makes reference to a creative industries study carried out on behalf of the GHURC recently.
- 6.8 Importantly, the redevelopment of the area as envisaged in the planning brief will create a significant number of new job opportunities. The Gloucester Heritage Urban Regeneration Company (GHURC) estimate that around 1500 new jobs will be created.
- 6.9 Large-scale redevelopment of the nature proposed will help to stimulate investment and will also provide opportunities for small as well as large businesses.

- 6.10 Much of the Greater Blackfriars area is inefficiently or under-used. The planning brief will ensure that new buildings make much more effective use of the space available. In particular, the revised brief now allows for the possibility of development along the northern edge of the proposed square (north of the priory) subject to maintaining appropriate visual links. This would represent even more efficient use of land in this area.
- 6.11 The location of the site means that is highly accessible to education and health care facilities.
- 6.12 The provision of 300 new dwellings will not only help contribute to the vitality and viability of the area but will also include a proportion of affordable dwellings. Additional dwellings will also help reduce the opportunity for crime by providing additional surveillance throughout the day.
- 6.13 Parts of the brief area are contaminated. The redevelopment of the area provides the opportunity to remediate any contamination, which will have a positive impact in terms of improving soil/land quality.
- 6.14 A number of the changes made to the revised brief will have a positive impact. For example, additional reference is now made to nature conservation and the need for measures to be introduced to improve sustainability including bat boxes etc. Also in terms of the impact of climate change, additional reference is made to the need to take into account adaptation to climate change through the design and layout of new development. This should help to reduce vulnerability to climate change by ensuring that new development is able to adapt.
- 6.15 An additional requirement has been inserted relating to the submission of an archaeological assessment. This will help to ensure that any new development has full regard to the potential impact on the historic environment.

7. BUSINESS AS USUAL/DO NOTHING SCENARIO

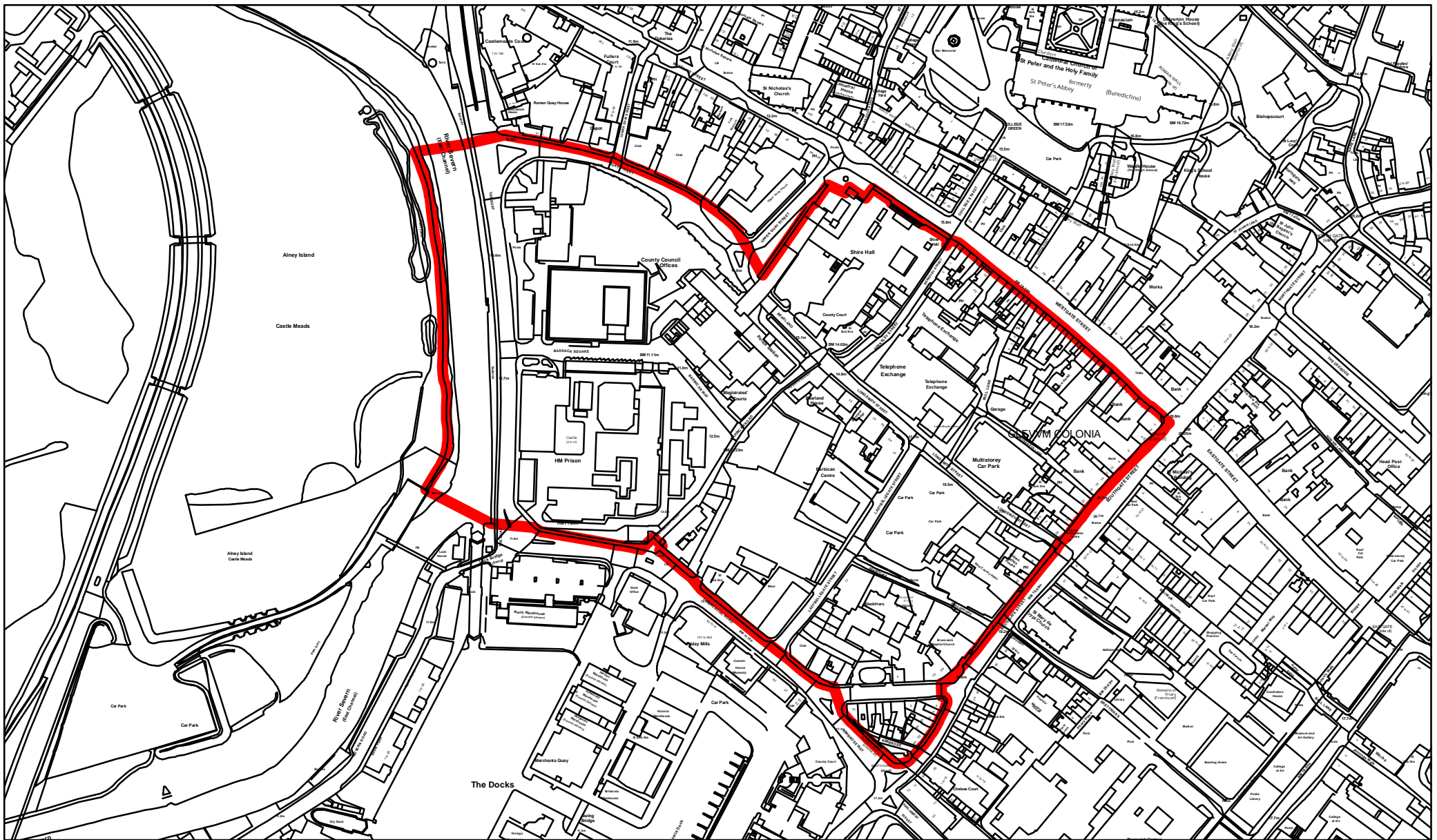
- 7.1 The redevelopment of the Blackfriars area has been a long-standing objective of the City Council but so far, a comprehensive redevelopment proposal has yet to be implemented.
- 7.2 The Blackfriars area is now one of the GHURC's priority sites. This will help to stimulate developer interest and ensure a scheme comes forward.
- 7.3 The planning brief has an important role to play in guiding new development in the Greater Blackfriars area. Without it or without Policy CA19 of the Central Area Action Plan in place, it is possible that a less beneficial scheme will come forward, or even that no scheme comes forward at all.
- 7.4 If the area were to remain in its current state this would not be the most sustainable outcome. The brief area offers significant potential to achieve a number of tangible benefits such as job creation, new investment, better access to facilities, reduced car use and so on.
- 7.5 The brief and associated policy will help to ensure that these objectives are achieved.

8. COMMENTS AND SUGGESTED CHANGES

- 8.1 The sustainability appraisal has produced no suggested changes.

9. CONCLUSION AND NEXT STEPS

- 9.1 This appraisal has helped to identify areas in which the revised draft Planning Brief performs well in sustainability terms and areas in which it doesn't perform so well and where mitigation can reduce the impact of development e.g. through a waste minimisation statement.
- 9.2 All comments we receive on the revised draft brief and this further sustainability appraisal will be taken into account and will be incorporated as far as possible into a version of the brief that will be adopted as interim Council guidance in June 2008 pending adoption as formal SPD alongside the Central Area Action Plan at a later date.



Greater Blackfriars

Not to Scale



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Greater Blackfriars Revised Draft Planning Brief – Sustainability Matrix

SA Objectives	Impact ++ + 0 -- - ?	Likely Timing of Impact (Short, Med, Long Term)	Temporary or Permanent Impact?	Geographic Scale	Likelihood of Impact	Significance of Impact	Commentary (any cumulative, secondary, synergistic impacts?) & Recommendations for Improvement/Mitigation
1. To protect the City's most vulnerable assets							
1.a. Will it minimise the risk of flooding to people and property?	-	L/T	Permanent	Local Area	High/Moderate	High	Part of the Prison and Quay and Quayside Wing sites are located within Flood Zones 2 and 3. A Desk Study will be required to accompany any planning application in order to ascertain flood risk. Subsequent mitigation measures would be required and this is stipulated in the revised planning brief.
1.b. Will it conserve and enhance natural/semi-natural habitats?	?	-	-	-	-	-	Uncertain impact although the Planning Brief requires contributions towards the creation of a riverside walk, which may offer the opportunity for positive enhancement.

1.c. Will it conserve and enhance species diversity and in particular, avoid harm to protected species?	+	M/T	Permanent	Site-specific	Moderate	High	The revised Planning Brief requires that where possible, opportunities should be exploited to encourage wildlife, for example through the erection of swift, house-martin, and bat boxes.
1.d. Will it maintain and enhance sites designated for their nature conservation interest?	0	-	-	-	-	-	-

1.e. Will it maintain and enhance cultural and historical assets?	++	S/T	Permanent	Site Specific	High	High	<p>The Greater Blackfriars area includes a number of important cultural and historical assets that would be enhanced as part of any scheme. These include Blackfriars Priory, the original Shire Hall building, the Crown Court, the Prison, and views to the Cathedral.</p> <p>Any scheme would involve, where possible, the removal of large-scale twentieth century architecture, to be replaced with new development that respects and enhances the historic grain of the area.</p> <p>Historic routes through the site should be retained and utilised as pedestrian and cycle routes.</p> <p>The revised brief makes additional reference to the importance of the historic environment including a new site specific obligation for an archaeological assessment to be submitted as part of any application.</p>
1.f. Will it maintain and enhance woodland cover?	0	-	-	-	-	-	-

2. To Deliver Sustainable Economic Growth							
2.a. Will it create new and lasting full time jobs particularly for those most in need of employment?	++	M/T	Permanent	Citywide	High	High	<p>The allocation for the Greater Blackfriars area requires the provision of a number of employment-related uses, including offices, retail, hotel and conferencing facilities, leisure and cultural uses, restaurants bars and cafes.</p> <p>This will lead directly to the creation of a large number of new employment opportunities. The GHURC estimate that 1500 jobs will be created in the area.</p> <p>Moreover, Greater Blackfriars is located within Westgate ward – one of the most deprived in Gloucester. It is therefore probable that some of the jobs created will be utilised by those most in need of employment.</p> <p>The Skills Brokerage Initiative in the City being promoted by the Learning and Skills Council could ensure that newly created jobs were available for local people.</p>

<p>2.b. Will it encourage both indigenous and inward investment?</p>	<p>++</p>	<p>L/T</p>	<p>Permanent</p>	<p>Trans-boundary</p>	<p>High</p>	<p>High</p>	<p>The redevelopment of the Greater Blackfriars area will strongly encourage both indigenous and inward investment by providing a comprehensive, high quality large-scale regeneration project in a key part of the City Centre.</p> <p>It is also likely that the successful completion of this scheme will boost investor confidence in the City and may therefore have knock-on effects on other areas of Gloucester.</p>
<p>2.c. Will it help to support and encourage the growth of small businesses?</p>	<p>+</p>	<p>M/T</p>	<p>Permanent</p>	<p>Citywide</p>	<p>High</p>	<p>High</p>	<p>The redevelopment of this area will provide a number of opportunities for small businesses for example small-scale specialist retail provision and retail/gallery/showroom space around Blackfriars Priory.</p>

<p>2.d. Will it help to improve the attraction of Gloucester as a tourist destination?</p>	<p>++</p>	<p>M/T</p>	<p>Permanent</p>	<p>Trans-boundary</p>	<p>High</p>	<p>High</p>	<p>The enhancement of the cultural and historic assets within this area through a comprehensive mixed-use scheme will help to improve the attraction of Gloucester as a tourist destination, improving what the City already has, and offering new attractions.</p> <p>Central to this is the provision of a new 4* hotel with conferencing facilities.</p> <p>The revised brief also makes reference to the provision of performance space.</p>
<p>3. To minimise consumption of natural resources and production of waste</p>							

<p>3.a. Will it encourage the most efficient use of land and buildings?</p>	<p>++</p>	<p>M/T</p>	<p>Permanent</p>	<p>Site-Specific</p>	<p>High</p>	<p>High</p>	<p>Significant parts of the Greater Blackfriars area are under-used or inefficiently used. Much of the area for example is laid out for surface level car parking which represents a highly inefficient use of land.</p> <p>The planning brief offers the opportunity to make much more effective use of the land within the brief area.</p> <p>The revised brief makes reference to a possible development block on the northern edge of the proposed square to the north of the priory. This would improve the efficient use of land yet further.</p>
<p>3.b. Will it encourage development on previously developed land?</p>	<p>++</p>	<p>M/T</p>	<p>Permanent</p>	<p>Site-Specific</p>	<p>High</p>	<p>High</p>	<p>The implementation of the planning brief will involve the re-use of a significant amount of previously developed land and buildings.</p>

3.c. Will it minimise the demand for raw materials and/or encourage the use of raw materials from sustainable sources?	-	M/T & L/T	Both	Trans-boundary	Moderate	Moderate	<p>A demand for raw materials will be created during the construction phase of this large project. The ongoing operation of the new uses will also involve the consumption of additional raw materials.</p> <p>The revised brief stipulates a requirement to achieve Level 3 of the Code for Sustainable Homes which should help to reduce the level of impact.</p>
3.d. Will it increase waste recovery and recycling?	+	L/T	Permanent	Site-Specific	High	Moderate	The revised planning brief makes reference to the need for a waste minimisation statement to accompany any new development.
3.e. Will it help to reduce the amount of waste that is generated?	+	L/T	Permanent	Site-Specific	High	Moderate	See comment above.
3.f. Will it positively encourage renewable forms of energy?	+	L/T	Permanent	Site Specific	High	High	A stipulation of the planning brief is the provision of on-site renewable energy generation to the value of 10% of the scheme's predicted energy requirements, in accordance with policy BNE.16 of the Council Development Control Policies Development Plan Document.

3.g. Will it reduce water consumption?	-	L/T	Permanent	Site-Specific	Moderate	Moderate	<p>A development of the size proposed will increase water consumption to an extent.</p> <p>The revised brief stipulates a requirement to achieve Level 3 of the Code for Sustainable Homes which should help to reduce the level of impact.</p>
4. To ensure everyone has access to the essential services they require and that local needs are met							
4.a Will it help everyone access essential basic services easily, safely and affordably?	++	M/T	Permanent	Central Area	High	High	<p>Being located within the Central Area of Gloucester this area has excellent access to a range of essential basic services, including the hospital, road networks, sustainable transport modes, and so on.</p> <p>It will also provide new facilities and services for existing residents and other Central Area occupants such as people who work in the area.</p>

<p>4.d. Will it provide additional leisure facilities, green spaces and improve access to existing facilities?</p>	<p>++</p>	<p>M/T</p>	<p>Permanent</p>	<p>Site-Specific</p>	<p>High</p>	<p>High</p>	<p>The Planning Brief seeks the provision of comparison goods retailing, bars and restaurants, a hotel, and theatre. It also seeks the enhancement of the Priory through the provision of public open space, the downgrading of the Quay as a route for vehicular traffic contributions from developers towards the creation of a riverside walk, and improved pedestrian linkages to the Quay, Greyfriars, and the Docks.</p> <p>The implementation of the brief will therefore provide additional leisure facilities, green spaces, and improve access to existing facilities.</p>
<p>4.e. Will it help to ensure that everyone has access to safe and affordable housing?</p>	<p>++</p>	<p>M/T</p>	<p>Permanent</p>	<p>Site-Specific</p>	<p>High</p>	<p>High</p>	<p>The planning brief envisages the provision of around 300 new dwellings. Based on 40% provision, this would provide in the region of 120 new affordable homes. The design requirements of the planning brief will help to ensure that new housing has regard to community safety through the design process.</p>

4.f. Will it reduce homelessness?	?	-	-	-	-	-	Potentially positive impact through an increase in the provision of new homes however homelessness is caused by a range of factors not just affordability of dwellings. Difficult to predict with any degree of certainty.
5. To improve standards of health and education							
5.a. Will it improve health and people's ability to engage in healthy activities?	+	M/T	Permanent	Central Area	Moderate	Moderate	<p>The Planning Brief seeks the provision of contributions towards the creation of a new riverside walk, and also improved pedestrian linkages to the Quay, Greyfriars and the Docks.</p> <p>There is potential therefore, that this scheme will improve peoples health and their ability to engage in healthy activities by improving walking routes within and adjacent to the City.</p>
5.b. Will it improve access to health care facilities?	+	M/T	Permanent	Site-specific	High	Moderate	The central location of the site means that it is accessible to a wide range of health care facilities.
5.d. Will it improve access to learning, training, skills and knowledge?	+	M/T	Permanent	Site-specific	High	Moderate	The central location of the site means that it is accessible to a wide range of schools as well as the Gloucestershire College.

5.e. Will it improve qualifications and skills of young people and adults?	+	L/T	Permanent	Citywide	Moderate	Moderate	A scheme of this size will require a financial contribution to be made towards the Learning, Skills and Employment Initiative. This will help provide opportunities to improve the skills and job prospects of young people and adults in the Central Area.
6. To make Gloucester a great place to live and work							
6.a. Will it help to reduce crime and the fear of crime?	+	L/T	Permanent	Site Specific	Moderate	High	<p>Any scheme must be designed in accordance with the Councils draft Supplementary Planning Document 'Designing Safer Places', and ODPM's document 'Safer Places: The Planning System and Crime Prevention'.</p> <p>A mixed-use scheme of this scale will also introduce additional activity into the area throughout the day and evening, which, through natural surveillance for example, can reduce the opportunity and incidence of crime.</p>

6.b. Will it encourage community engagement in community activities?	+	M/T	Permanent	Central Area	Moderate	Moderate	Potentially positive impact through the provision of new cultural facilities. Extent of impact will depend on the type of facilities provided. The revised brief makes additional reference to performance space.
6.c. Will it increase the ability of people to influence decisions?	0	-	-	-	-	-	-
6.d. Will it improve community cohesion?	0	-	-	-	-	-	-
6.e. Will it help to maintain and/or enhance the vitality and viability of a designated centre?	+	M/T	Permanent	City Centre	High	High	This implementation of this Planning Brief will enhance the vitality of viability of the City Centre. It will increase the range of attractions and amenities available to City residents, improve the quality of environment of this underused and unattractive area of the City, and improve accessibility to and from this area to others across the City.
6.f. Will it increase access to and participation in, cultural activities?	+	M/T	Permanent	Citywide	High	Moderate	The provision of a new theatre in this area will increase access to, and potentially participation in, cultural activities. The revised brief makes additional reference to performance space.

6.g. Will it reduce poverty and income inequality?	+	L/T	Permanent	Citywide	Moderate	High	The development of the Blackfriars area will create a significant number of new employment opportunities. The LSE initiative will help to ensure that local people benefit. It is possible therefore, that it could lead to a reduction in poverty and income inequality – particularly for Westgate Ward, in which it is located. This ward is one of the most deprived in Gloucester.
6.h. Will it reduce the number of unfit homes?	0	-	-	-	-	-	-
6.i. Will it improve the quality of where people live?	+	M/T	Permanent	Citywide	High	High	The redevelopment of this run-down, underused area of the City will improve the quality of life for residents of Gloucester.
7. To reduce the need to travel							
7.a. Will it reduce the need/desire to travel by car?	++	M/T	Permanent	Site Specific	High	High	The area is located within the Central Area of Gloucester and is therefore well located for access to sustainable modes of transport such as the bus, train, cycle routes and walking. The Brief also seeks improvements to pedestrian access through the site, and to other areas of the City such as the Quay, Greyfriars and the Docks.

7.b. Will it help ensure that alternatives to the car are available for essential journeys, especially to residents in areas of low car ownership?	++	M/T	Permanent	Site Specific	High	High	See comments above.
7.c. Will it help to achieve a reduction in road accident casualties?	0	-	-	-	-	-	-
7.d. Will it increase the proportion of freight carried by rail and water?	0	-	-	-	-	-	-
7.e. Will it help to reduce traffic congestion and improve road safety?	0	-	-	-	-	-	-
8. To improve environmental quality (air, water, land)							
8.a. Will it help to reduce any sources of pollution?	0	-	-	-	-	-	-
8.b. Will it help to reduce levels of noise?	0	-	-	-	-	-	-
8.c. Will it maintain and enhance water quality?	0	-	-	-	-	-	-
8.e. Will it maintain and enhance air quality?	0	-	-	-	-	-	-
8.f. Will it maintain and enhance land/soil quality?	++	MT/LT	Permanent	Site Specific	High	High	There is a strong possibility that contamination exists on the site. A ground investigation survey will therefore be required in advance of the submission of any planning application, and subsequent mitigation measures where required. The potential exists therefore to enhance the land/soil quality of the Blackfriars area.

8.g. Will it reduce the amount of derelict, degraded and underused land?	++	M/T	Permanent	Site Specific	High	High	Large amounts of this area are currently derelict and underused, and its redevelopment will therefore have a direct, positive effect in this regard.
9. To reduce contributions to climate change							
9.a. Will it reduce contributions to climate change?	-	LT	Permanent	Trans-boundary	High	Moderate	<p>The provision of a major mixed-use development scheme will have some negative impact during construction and ongoing through the lifetime of the development.</p> <p>The revised brief will help to ensure that this impact is minimized through proper waste management and sustainable construction.</p>
9.b. Will it reduce vulnerability to climate change?	+	LT	Permanent	Site Specific	High	Moderate	The revised planning brief requires any new development to take into account adaptability to climate change. This should help to reduce vulnerability through appropriate design and layout.