

**GLOUCESTER LOCAL DEVELOPMENT  
FRAMEWORK**

**SUSTAINABILITY APPRAISAL OF THE  
REVISED DRAFT  
SUPPLEMENTARY PLANNING  
DOCUMENT:**

**‘DESIGNING SAFER PLACES’**

**SEPTEMBER 2007**

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**APPENDIX 1 – SUSTAINABILITY APPRAISAL MATRIX**

## **1. Introduction**

- 1.1 As part of the emerging Local Development Framework for Gloucester, we have prepared a revised draft Supplementary Planning Document (SPD) dealing with the issue of community safety in new development entitled 'Designing Safer Places'.
- 1.2 The purpose of the revised SPD is to ensure that all new development, taking place in Gloucester has regard to the fundamental principles of community safety, which will help to reduce the opportunities for and occurrence of, crime.
- 1.3 This is an important issue for Gloucester because the crime rate for a number of different types of crime is above the County average.
- 1.4 The SPD is principally relevant to new development proposals but the tenets of good design set out in the document can also be applied to alterations or extensions to existing development.
- 1.5 This document is a 'Sustainability Appraisal' that has been carried out on the revised draft SPD in order to determine how well it performs in 'sustainability' terms and whether the changes made to the original draft have made the document more or less sustainable. In other words, to identify the extent to which it meets social, economic and environmental objectives.
- 1.6 The appraisal helps us to identify what level of impact the SPD 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.
- 1.7 The appraisal helps us to identify how the SPD 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.
- 1.8 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 describes relevant baseline data and background information and Section 5 describes the main findings of the appraisal process.
- 1.9 Section 6 considers the 'do-nothing' or business as usual scenario, in other words, what would be the effect of not having the SPD in place and Section 7 flags up any comments and suggested improvements that could be made to the revised draft SPD to improve its performance in sustainability terms.

- 1.10 Attached to the appraisal at Appendix 1 is a completed 'Sustainability Appraisal Matrix' setting out in detail the predicted impact of the revised draft SPD when set against a series of sustainability sub-objectives (the use of this matrix is explained in more detail in Section 2 below).
- 1.11 The sustainability appraisal has been carried out to assist people in making comments on the revised draft SPD itself. The deadline for comments on this document is the same as the deadline for submitting comments on the revised draft SPD i.e. **12<sup>th</sup> November 2007**.
- 1.12 Comments should be sent to:
- Planning Policy Team  
Gloucester City Council  
Herbert Warehouse  
The Docks  
Gloucester  
GL1 2EQ
- 1.13 Comments can also be submitted electronically using the following email address: [pdc@gloucester.gov.uk](mailto:pdc@gloucester.gov.uk) or by logging onto the Council's website at [www.gloucester.gov.uk](http://www.gloucester.gov.uk)
- 1.14 If you have any questions about this document or the revised draft SPD 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 where each policy and proposal applies.
- 2.3 Supporting these main Development Plan Documents will be a number of generic Supplementary Planning Documents or SPDs including:
- Affordable Housing
  - New Housing and Open Space
  - Designing Safer Places
  - Extending Your Home
  - Telecommunications
  - Development Affecting Sites of Historic Environment (Archaeological) Interest
  - Lifetime Homes
- 2.4 The purpose of these documents is to support and provide additional information in relation to the main Development Plan 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 Designing Safer Places revised draft SPD.
- 2.7 Appraisals of the other SPDs listed above (except affordable housing and open space – to be published at a later date) 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](http://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 the SPD in order to determine how well it performs in sustainability terms.
- 3.18 The completed sustainability matrix is set out at Appendix 1 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 5, 6 and 7 below.

#### **4. Relevant Baseline Information**

- 4.1 This section of the appraisal briefly sets out the relevant baseline information we have in order to put the appraisal process in context.
- 4.2 Since 1991, an average of 560 dwellings have been completed in the City per year. The majority of these dwellings will be located on schemes of 6 or more dwellings. Not all of these schemes will have been subject to the scrutiny of the advice contained in the SPD. It is fair to say therefore that not all dwellings in the City are being constructed to a standard that seeks to 'design out' crime and make the new living environment as safe and secure as possible.
- 4.3 A significant number of new homes will be built in Gloucester over the next twenty years and it is important that these are designed and built having regard to the issue of community safety and how to reduce the occurrence and perception or 'fear' of crime.
- 4.4 Gloucester has poor statistics in relation to both the occurrence and perception of crime although great efforts are being made through the Gloucester Crime and Disorder Reduction Partnership.
- 4.5 During 2004, the number of crimes committed by 10 – 17 year olds was 114.02 per 1,000 population. This is substantially higher than the figure for the County at just 69.08 per 1,000 population. In relation to vehicle crime, the figure for 2003/2004 for Gloucester shows 29.8 people affected per 1,000 population, which compares to a County average of just 14.8 people per 1,000 and a national average of 16.9 people per 1,000 population. (All data from the Gloucester Story 2005, Audit Commission Best Value Performance Indicators).
- 4.6 Domestic burglaries in Gloucester over the period 2003/2004 equated to 21.8 per 1,000 population, which compares to 16 per 1,000 for the County and 15.6 per 1,000 population nationally. The statistics for violent crime show 26.5 people per 1,000 affected in Gloucester over the 2003/2004 period, with just 14.6 per 1,000 in the County and 18.2 per 1,000 nationally. (All data from the Gloucester Story 2005, Audit Commission Best Value Performance Indicators).
- 4.7 In relation to the perception of crime, in 2004, 85.60% of people in Gloucester felt safe in daylight in their neighbourhood, compared with 90.30% of County residents.
- 4.8 The corresponding figure for night time shows that 32.7% of Gloucester residents feel safe in their neighbourhood compared to 44.2% of County residents, (Source: The Gloucester Story 2005, compiled by Gloucestershire County Council. Data from Gloucestershire Community Safety Partnership Perception of Crime Surveys 2001 – provided by MAIDeN 2003).

4.9 The statistics outlined above show that the occurrence of crime in Gloucester is higher than both the County and National averages and that the perception of crime is higher than the County average.

## 5.0 Overall Findings

- 5.1 The appraisal process has demonstrated that the revised draft SPD performs well in sustainability terms.
- 5.2 Particular objectives that would be met through the application of the guidance set out in the SPD include ensuring that everyone has access to safe and affordable housing (emphasis added); helping to reduce crime and the fear of crime and improving the quality of where people live.
- 5.3 The SPD seeks to ensure that new development, both the built form and the public realm, is well designed from the outset, that it makes best use of natural surveillance and incorporates features to ensure that opportunistic crime is reduced. The guidance in the SPD will therefore contribute towards the creation of safer environments, which should help to reduce the occurrence of crime.
- 5.4 Concerning the perception of crime, a well-designed environment will instinctively feel safer to move through, and the result should be an increased feeling of safety both during the day and at night.
- 5.5 It is uncertain whether the SPD will have an impact on existing crime levels or fear of crime as the SPD does not aim to affect or change existing residential developments, it only addresses new developments.
- 5.6 Obviously current statistics are based on the existing built fabric and form of the City. In order for statistics to be fundamentally altered then crime reduction techniques need to be implemented Citywide, the 'Designing out Crime' SPD is just part of the package of techniques and is aimed specifically at new build residential schemes.
- 5.7 Only a very small number of amendments have been made to the revised SPD concerning the provision of recycling facilities. This may have a small positive impact on waste minimisation and recycling and is reflected in the assessment set out in full in the matrix attached at Appendix 1.

## **6.0 Business as Usual or Do-Nothing Scenario**

- 6.1 Application of the 'do-nothing' or business as usual scenario does not perform well in sustainability terms.
- 6.2 Without the guidance in place, the Council will be in a weaker position from which to negotiate satisfactory design solutions that fully address the issue of community safety and the need to reduce opportunities for crime.
- 6.3 This is likely to lead to a continuation of the currently higher than average crime rates seen in the City although we do acknowledge that this is affected by a number of factors, not just the design of new development.

## **7.0 Comments and Suggested Changes**

- 7.1 No suggested changes to the revised draft SPD have emerged as a result of the Sustainability Appraisal process.

## **8. Conclusion & Next Steps**

- 8.1 This appraisal has helped to identify areas in which the revised draft 'Designing Safer Places' SPD performs well in sustainability terms.
- 8.2 All comments we receive on the revised draft SPD and this sustainability appraisal of it, will be taken into account and will be incorporated as far as possible into a final version of the document.
- 8.3 It is anticipated that the SPD will be adopted as Interim Guidance by the Council in June 2008 and will be formally adopted as SPD alongside the Core Strategy in due course.



**Designing Safer Places Revised Draft SPD – 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
<b>1. To protect the City's most vulnerable assets</b>							
1.a. Will it minimise the risk of flooding to people and property?	0	-	-	-	-	-	-
1.b. Will it conserve and enhance natural/semi-natural habitats?	0	-	-	-	-	-	-
1.c. Will it conserve and enhance species diversity and in particular, avoid harm to protected species?	0	-	-	-	-	-	-
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?	0	-	-	-	-	-	-
1.f. Will it maintain and enhance woodland cover?	0	-	-	-	-	-	-

<b>2. To Deliver Sustainable Economic Growth</b>							
2.a. Will it create new and lasting full time jobs particularly for those most in need of employment?	0	-	-	-	-	-	-
2.b. Will it encourage both indigenous and inward investment?	0	-	-	-	-	-	-
2.c. Will it help to support and encourage the growth of small businesses?	0	-	-	-	-	-	-
2.d. Will it help to improve the attraction of Gloucester as a tourist destination?	0	-	-	-	-	-	-
<b>3. To minimise consumption of natural resources and production of waste</b>							
3.a. Will it encourage the most efficient use of land and buildings?	0	-	-	-	-	-	-
3.b. Will it encourage development on previously developed land?	0	-	-	-	-	-	-
3.c. Will it minimise the demand for raw materials and/or encourage the use of raw materials from sustainable sources?	0	-	-	-	-	-	-
3.d. Will it increase waste recovery and recycling?	+	ST	Permanent	Citywide	Low	Low	The revised SPD makes reference to the issue of recycling provision.
3.e. Will it help to reduce the amount of waste that is generated?	0	-	-	-	-	-	-

3.f. Will it positively encourage renewable forms of energy?	0	-	-	-	-	-	-
3.g. Will it reduce water consumption?	0	-	-	-	-	-	-
<b>4. To ensure everyone has access to the essential services they require and that local needs are met</b>							
4.a Will it help everyone access essential basic services easily, safely and affordably?	0	-	-	-	-	-	-
4.d. Will it provide additional leisure facilities, green spaces and improve access to existing facilities?	0	-	-	-	-	-	-
4.e. Will it help to ensure that everyone has access to safe and affordable housing?	++	S/T	Permanent	Citywide	High	High	The SPD will not have any impact on the level of affordable housing in the City but it will ensure that the affordable housing that is built will be designed to a standard to ensure enhanced safety, both perceived and real.
4.f. Will it reduce homelessness?	0	-	-	-	-	-	-
<b>5. To improve standards of health and education</b>							
5.a. Will it improve health and people's ability to engage in healthy activities?	0	-	-	-	-	-	-
5.b. Will it improve access to health care facilities?	0	-	-	-	-	-	-
5.d. Will it improve access to learning, training, skills and knowledge?	0	-	-	-	-	-	-

5.e. Will it improve qualifications and skills of young people and adults?	0	-	-	-	-	-	-
<b>6. To make Gloucester a great place to live and work</b>							
6.a. Will it help to reduce crime and the fear of crime?	++	M/T	Permanent	Citywide	High	High	<p>Well-designed housing developments will experience lower levels of crime as they will be designed to provide good surveillance and the opportunities for opportunistic crime will be reduced.</p> <p>Well-designed areas of public realm within new developments will also help to increase the sense of public safety and will reduce the perceived sense of crime.</p> <p>A secondary impact may be greater community cohesion as a result of safer environments being created.</p>
6.b. Will it encourage community engagement in community activities?	0	-	-	-	-	-	-
6.c. Will it increase the ability of people to influence decisions?	0	-	-	-	-	-	-

6.d. Will it improve community cohesion?	+	M/T	Permanent	Citywide	Moderate	Moderate	The document will help contribute towards a reduction in crime, which should lead to a greater feeling of safety among residents. This is likely to have a positive effect on community cohesion, as people are more likely to interact and become involved with each other and in community activities.
6.e. Will it help to maintain and/or enhance the vitality and viability of a designated centre?	0	-	-	-	-	-	-
6.f. Will it increase access to and participation in, cultural activities?	0	-	-	-	-	-	-
6.g. Will it reduce poverty and income inequality?	0	-	-	-	-	-	-
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	Moderate	Moderate	Implementation of the guidance set out in the SPD will lead to an improvement in the quality of the environment of new developments.
<b>7. To reduce the need to travel</b>							
7.a. Will it reduce the need/desire to travel by car?	0	-	-	-	-	-	-
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?	0	-	-	-	-	-	-

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	-	-	-	-	-	-
<b>8. To improve environmental quality (air, water, land)</b>							
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?	0	-	-	-	-	-	-
8.g. Will it reduce the amount of derelict, degraded and underused land?	0	-	-	-	-	-	-
<b>9. To reduce contributions to climate change</b>							
9.a. Will it reduce contributions to climate change?	0	-	-	-	-	-	-
9.b. Will it reduce vulnerability to climate change?	0	-	-	-	-	-	-