

Gloucester City Council

Local Development Framework

**Sustainability Appraisal of
Revised Draft Heights of
Buildings Supplementary
Planning Document**

August 2008



GLOUCESTER
CITY COUNCIL

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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) that provides of planning policy framework for dealing with tall buildings in Gloucester.
- 1.2 For the purposes of this SPD, a tall building is defined as any structure that breaks the skyline and/or which is significantly or noticeably taller than its surrounding built fabric.
- 1.3 The proposed approach utilises two main spatial assessment criteria; areas-based and view-corridor based.
- 1.4 The area-based approach uses the Council's thirteen adopted Conservation Area Appraisals as a means of assessing the kind of development that would be appropriate within them.
- 1.5 Development within Conservation Area will be limited to a height that does not noticeably or significantly exceed that of the surrounding built form, and should pay due respect to the context of the development and the dominant character of the area.
- 1.6 Where larger development sites exist within Conservation Areas, it may be appropriate to mirror the variety of building heights within the local context, in order to better integrate the developments into the existing built environment.
- 1.7 The view-corridor based approach identifies a number of strategic view corridors and local view corridors that are strategically important in retaining the unique character and distinctiveness of Gloucester. View corridors are defined as direct or partial views of the cathedral or other historic buildings within the city.
- 1.8 Proposals for tall buildings that would impact upon the setting of a historic landmark building or would be located adjacent to the identified view corridors should be avoided. Proposals for tall buildings that would block or harm a view corridor to an important historic structure would not be permitted.
- 1.9 The SPD also identifies a range of other key considerations that would be taken into account when assessing a proposal for a tall building. These include; scale and massing; relationship to context; archaeology; design and architectural quality; microclimate and local environmental impact; and sustainability.
- 1.10 This document is a 'Sustainability Appraisal' that has been carried out on the revised draft Heights of Buildings SPD in order to determine how well it performs in 'sustainability' terms. In other words, to identify the extent to which it meets social, economic and environmental objectives and in particular, to consider how the changes made to the original draft version published in December 2007, may have made it more, or less, sustainable.
- 1.11 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.

- 1.12 The appraisal also helps us to identify how the SPD might be further improved. It helps 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.
- 1.13 This document is divided into a number of clear sections. Section 2 outlines the background to the SPD, Section 3 the nature of the sustainability appraisal process that has been carried out, Section 4 describes relevant baseline data and background information and Section 5 describes the main findings of the appraisal process.
- 1.14 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 draft SPD to improve its performance in sustainability terms.
- 1.15 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 3 below).
- 1.16 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. **19 September 2008**.
- 1.17 Comments should be sent to:
- Urban Design
Gloucester City Council
Herbert Warehouse
The Docks
Gloucester
GL1 2EQ**
- 1.18 Comments can be submitted electronically using the following email address: planningpolicy@gloucester.gov.uk or by logging onto the Council's website at www.gloucester.gov.uk/planning
- 1.19 If you have any questions about this document or the revised draft SPD to which it relates please call 01452 396847 for assistance.

2. Background

- 2.1 The Council is in the process of preparing a Local Development Framework (LDF) for Gloucester. This will replace the existing Local Plan. The LDF will consist of two main Development Plan Documents (DPD) as follows:
- Joint Core Strategy (jointly prepared between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council)
 - Non Strategic Policies, Allocations and Designations (covering Gloucester City only)
- 2.2 These documents will be accompanied by a Proposals Map, which will illustrate graphically where each policy and proposal applies.
- 2.3 Supporting the main DPDs will be a number of topic-based and site-specific Supplementary Planning Documents (SPD). The Heights of Buildings SPD is one of the topic-based SPDs and will support policy contained within the Joint Core Strategy.
- 2.4 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.

3. The Sustainability Appraisal Process

What is 'Sustainability'?

3.1 There is no single definition of sustainability. A commonly used definition 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 We have previously published a Sustainability Appraisal 'Scoping Report' which sets out the 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 Hard copies may be viewed and/or purchased from the City Council Offices.

3.5 The Scoping Report was subject to consultation with the Environment Agency, the Countryside Agency and English Nature (now amalgamated as Natural England), 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.

- 3.6 Key sustainability issues identified for Gloucester in the scoping report 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

- 3.7 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.

- 3.8 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.

- 3.9 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
- 3.10 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, proposals and options during the sustainability appraisal process.
- 3.11 For example, under headline objective 1, which is to protect the City's most vulnerable assets, a policy, proposal or option 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.
- 3.12 Under headline objective 5, which is to improve standards of health and education, a policy, proposal or option would be assessed in terms of how well it would contribute towards improved 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.
- 3.13 Clearly some objectives will be more relevant to certain policies, proposals and options 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.
- 3.14 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. We have identified these less obvious linkages wherever possible.
- 3.15 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.

- 3.16 The completed sustainability matrix is set out at Appendix 1. 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

- 3.17 Commentary on the main findings of the appraisal is set out in Sections 5, 6 and 7 below.

4. Relevant Baseline Information

- 4.1 In order to determine the impact of the Council's approach towards proposals for tall buildings in Gloucester, it is necessary to consider the position as exists at present – the 'baseline position'.
- 4.2 Gloucester currently has a number of tall buildings. Many such buildings are positive and contribute to the historic character of the city, and include Gloucester Cathedral, St Michaels tower, as well as a number of churches. One of the main aims of this SPD is to ensure that the views and settings of these positive tall buildings are not undermined through inappropriate development.
- 4.3 There are however also a number of poor quality twentieth century buildings that do not appropriately relate to the context within which they are situated. They do not respect the historic patterns of development within the city. Such buildings include the Gloscat Tower, the Hospital Tower, the County Council Offices, and Clapham Court. It is envisaged that some of these buildings may be redeveloped as part of the ongoing regeneration of Gloucester.

5. Overall Findings

- 5.1 The full results of our Sustainability Appraisal are set out in the SA matrix attached at Appendix 1. The main findings are summarised below.
- 5.2 The revised draft Heights of Buildings Supplementary Planning Document (SPD) performs very well when assessed against the SA Matrix. There are a number of positive impacts, and whilst there are a number of uncertain potential impacts, no negative impacts have been identified.
- 5.3 The most important positive impact that has been identified is the maintenance and potential enhancement of cultural and historic assets in the City. The proposed policy approach as detailed in the SPD is relatively restrictive, in that it will not allow inappropriate buildings within Conservation Areas, and also that proposals must have regard to maintaining both strategic and local view corridors. As such it will help to ensure that the cultural and historic assets of the City are not eroded by inappropriate development.
- 5.4 The SPD is also likely to have a positive impact in terms of improving the quality of where people live. This will be achieved by ensuring that inappropriate development does not take place, and through the provision of appropriate taller buildings in appropriate locations that are integrated effectively into the built form. A good example would be through the provision of locally distinctive architecture, based on the use of contextual building materials.
- 5.5 The implementation of the SPD may also have a positive impact in terms of reducing crime and the fear of crime through natural surveillance from overlooking created through the development of buildings of an appropriate height.
- 5.6 The assessment has also highlighted a number of uncertain impacts, though it should be noted that such uncertainty relates only to potential positive impacts. Such uncertain impacts include helping to improve the attraction of Gloucester as a tourist destination. It is likely that Gloucester's appeal will be maintained by ensuring that inappropriate development that could erode the historic context of the City does not occur. There is also the potential that it may be improved through the continued provision of high quality development.

6. 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 Such an approach would essentially be a continuation of the current local development plan approach. In Gloucester, this relates to the adopted 1983 Local Plan, which defines central areas where development should not exceed a certain height and also a number of important 'avenues of vision', which are based on the protection of views toward the cathedral.
- 6.3 The policy framework would also include policies as set out in the Second Stage Deposit Draft Local Plan (2002) which has been adopted by the Council for development control purposes. Again, a similar approach to that outlined above is taken, requiring that proposed developments should respect and protect the cities skyline and important views and vistas within the city, views of the surrounding countryside from within the city and views of the city from the surrounding countryside. The policy acknowledges that it is particularly important to protect views of the Cathedral.
- 6.4 The policy framework outlined above, whilst relatively comprehensive, does not provide an appropriate policy framework for tall buildings in Gloucester. In particular, it does not effectively relate to the current planning and market conditions that exist both within the national and local context. A good example would be national planning policy encouraging higher densities on brownfield land in central locations.
- 6.5 Such an inadequate framework may lead to inappropriate future development that does not appropriately reflect the surrounding historic context, the prevailing built form and important local and strategic view corridors. This form of development would lead to the erosion of the historic character of the City over time.
- 6.6 An up-to-date approach towards the development of tall buildings in Gloucester as set out in the SPD will help to ensure that future developments are of high quality and positively impact on the city, as well as respond appropriately to those considerations set out above. The SPD will also help to provide certainty to developers as to what will be expected as part of future proposals.

7. Comments and Suggested Changes

7.1 None.

8. Conclusion & Next Steps

- 8.1 This appraisal has helped to identify that the revised draft Heights of Buildings SPD performs very well in sustainability terms. It has been demonstrated that the preferred option taken forward from the initial issues and options consultation represents an appropriate and sustainable option
- 8.2 All comments we receive on the revised draft SPD and this Sustainability Appraisal will be taken into account and will be incorporated as far as possible into a final version of the SPD that we will look to adopt as Interim Council guidance in November 2008, pending formal adoption as SPD alongside the Joint Core Strategy at a later date.

Revised Draft 'Heights of Buildings' Supplementary Planning Document
Sustainability Appraisal Assessment 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?	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?	++	MT	Permanent	Citywide	High	High	The document applies a policy approach to tall buildings that is essentially based on two principles; area (conservation area) and view corridor. Such an approach is relatively restrictive. For example, large areas of the city centre that are designated as conservation area will not be considered for tall buildings. Likewise, within the wider city, tall buildings would not be considered where it would undermine a significant view, for example that of the cathedral. This approach will help to maintain and potentially enhance to cultural and historic assets of the city.
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?	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?	?	-	-	-	-	-	Uncertain impact. Through the provision of well designed tall buildings in appropriate locations, Gloucester's attraction as a tourist attraction may improve.
3. To minimise consumption of natural resources and production of waste							
3.a. Will it encourage the most efficient use of land and buildings?	?	-	-	-	-	-	Uncertain impact. The document applies a policy framework with regard to tall buildings that is based on two principles; area (conservation areas) and view corridors. As such it is quite restrictive as to where tall buildings may be located, and will therefore lead to future developments that do not necessarily lead to the most efficient use of land and buildings, particularly with regard to density. That said, the document encourages tall buildings in appropriate locations subject to the satisfaction of a number of criteria, and in this case the document does encourage the most efficient use of land and buildings.
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?	0	-	-	-	-	-	-

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	-	-	-	-	-	-
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?	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?	0	-	-	-	-	-	-
4.f. Will it reduce homelessness?	0	-	-	-	-	-	-
5. To improve standards of health and education							
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	-	-	-	-	-	-
6. To make Gloucester a great place to live and work							

6.a. Will it help to reduce crime and the fear of crime?	+	MT	Permanent	Site Specific	High	Low	Appropriately designed and sited tall buildings will help to reduce the potential for crime and the fear of crime as a consequence of natural surveillance through overlooking.
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?	0	-	-	-	-	-	-
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?	+	MT	Permanent	Citywide	Moderate	Low	The provision of appropriate tall buildings in appropriate locations, that are well designed and integrate effectively into the surrounding built form, will positively impact upon the quality of where people live, for example through providing a source of local identity.
7. To reduce the need to travel							
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	-	-	-	-	-	-
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?	0	-	-	-	-	-	-
8.g. Will it reduce the amount of derelict, degraded and underused land?	0	-	-	-	-	-	-
9. To reduce contributions to climate change							
9.a. Will it reduce contributions to climate change?	0	-	-	-	-	-	-
9.b. Will it reduce vulnerability to climate change?	0	-	-	-	-	-	-

If you have problems understanding
this in English please contact:
Tapestry Translation Services, Corporate Personnel
Services, Herbert Warehouse, The Docks, Gloucester
GL1 2EQ. Tel: 01452 396909.

Bengali

ইংরেজী ভাষায় এটা বুঝতে আপনার সমস্যা হলে, দয়া করে নিচের
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Chinese

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Gujurati

તમોને જો આ ઈંગ્લીશમાં સમજવામાં તકલીફ પડતી હોય તો મહેરબાની
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Urdu

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