



GLOUCESTER CITY PLAN 2011-2031

SUSTAINABILITY (INTEGRATED) APPRAISAL

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

July 2019

enfusion



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

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

**Habitats Regulations Assessment (HRA) Report is
available separately**

Sustainability Appraisal Report July 2019

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

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

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of the Local Plan. The purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives¹. Gloucester City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process (incorporating SEA) for the new Gloucester City Plan (GCP).
- 1.2 This requirement for SA is in accordance with planning legislation² and paragraph 32 of the revised National Planning Policy Framework (2018, NPPF)³. Local Plans must also be subject to Strategic Environmental Assessment^{4,5} (SEA) and Government advises⁶ that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail. This SA Report is part of the evidence base for the Gloucester City Plan (GCP) and it accompanies the GCP Pre-Submission on Regulation 19 consultation.

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

- 1.3 The Council has chosen to integrate Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes, as well as SEA, within the overarching SA process. HIA is not a statutory requirement for local planning authorities but it is good practice in plan-making; health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty⁷ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and, where possible, to promote equality of opportunity.
- 1.4 For the SA of the emerging GCP, the integration of health and equality considerations has focused on ensuring that these issues are well represented in the SA Framework (through objectives and thresholds of significance) against which the developing options, policies and sites have been assessed. Health and equality issues have been addressed iteratively as the appraisal process has progressed. Details of the EqIA are presented separately to demonstrate compliance with the Equality Act (2010) in Appendix V to this SA

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

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

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

⁴ EU Directive 2001/42/EC

⁵ Environmental Assessment of Plans and Programmes Regulations, 2004

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

⁷ UK Equality Act, 2010

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

Habitats Regulations Assessment (HRA)

- 1.5 The Council is also required to undertake a Habitats Regulations Assessment⁸ (HRA) of the Gloucester City Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA screening stage considers if the potential impacts arising as a result of the GCP are likely to have significant effects on these sites either alone or in combination with other plans and projects. If likely significant effects are indicated, then the relevant elements of the emerging plan are investigated through the next stage of appropriate assessment (AA).
- 1.6 The HRA process has its own legislative drivers and requirements and, while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel with the SA process but the detailed methods and findings are reported separately. Summary HRA findings are incorporated into this integrated SA Report.

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

- 1.7 Gloucester City Council, in partnership with Cheltenham Borough Council and Tewkesbury Borough Council have produced a Joint Core Strategy (JCS) that sets out the strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period 2011 to 2031) sets out the housing and employment needs for the Gloucester City area, including the strategic direction for development growth and strategic policies. The Gloucester City Plan (GCP) covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance.
- 1.8 The GCT JCS⁹ (adopted December 2017) identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031. At least 14,359 of these dwellings are identified to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS therefore identifies strategic allocations around Gloucester to meet the residual need. Strategic allocations in the GCT JCS are at Policy A1 Innsworth and Twigworth, Policy A2 South Churchdown, Policy A3 North Brockworth, and Policy A6 Winnycroft.

⁸ Conservation of Habitats & Species Regulations (as amended 2017)

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

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

- 1.9 The GCP allocates local sites and includes local policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031. The GCP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability Appraisal, and consultation with the public, stakeholders and the regulators.
- 1.10 Work began on the GCP in 2011 when the City Plan Scope was consulted on in October. Over March/April 2012 further consultation on the City Plan Part 1 was undertaken, which set the context for City Plan, established the main challenges, developed a strategy for development and the key development principles from which planning policy would evolve. This was accompanied by a Sustainability Appraisal Statement that reported the assessment of the potential effects of the Key Development Principles against a number of SA Objectives.
- 1.11 Over a period of nine weeks between May and July 2013 further consultation was undertaken on the City Plan Part 2 which sought views on potential development sites, as well as a draft vision and strategy for the City Centre. This was accompanied by a Sustainability Appraisal undertaken by Gloucester City Council which signposted relevant scoping evidence, identified an appraisal methodology, and reported initial findings (by ward). The SA documents that have accompanied the GCP stages on consultation form part of the ongoing SA process. The City Council commissioned independent specialist consultants, Enfusion, to review and progress this SA work in June 2016.
- 1.12 The emerging draft GCP with Vision, Objectives, proposed Policies and potential site options for allocation was subject to public consultation, together with the supporting SA and HRA Reports in early 2017. The Council has considered the representations made, together with updated evidence, and further developed the draft GCP to the Pre-Submission stage.
- 1.13 The overall aspiration for the GCP is set out in the Vision and Key Principles, as follows:

GCP Vision:

“Between 2016 and 2031 the City Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.

During this time significant progress will have been made in the regeneration of the City Centre and elsewhere within the City. Gloucester will be a flourishing, healthy, modern and ambitious City, where people feel safe and happy in their community and are proud to live and work.

Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location. The City Council will work with partners and neighbouring authorities to ensure that the

economic development required beyond its boundary benefits Gloucester, while at the same time, supporting business growth and expansion within the City itself.

A significant number of new decent homes will have been delivered in a way that reflects the type and tenure needed by the local community and that supports economic growth.

Health and wellbeing will be a key consideration in all planning decisions ensuring the protection and provision of active streets, open spaces, playing fields, community infrastructure, environmental quality, connectivity and access.

New development will be built to the highest possible standard of design and will be focused on protecting the quality and local distinctiveness of the City.

Gloucester's unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy."

GCP Key Principles:

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

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

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

A: Housing

Policy A1: Effective use of land and buildings

Policy A2: Affordable housing

Policy A3: Regeneration of neighbourhoods and housing estates

Policy A4: Student accommodation

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

Policy A6: Accessible and adaptable homes

Policy A7: Self build and custom build homes

Policy A8: Static caravan sites

Policy A9: Extensions to existing dwellings

Policy A10: Annexes to existing dwellings

B: Employment Development, Culture and Tourism

Policy B1: Employment & Skills Plans

Policy B2: Safeguarding Employment Sites

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

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

Policy B5: Culture and Tourism

Policy B6: Protection of public houses

C: Healthy Communities

Policy C1: Active design and accessibility

Policy C2: Provision of Allotments

Policy C3: Provision of open space

Policy C4: Hot food takeaways

Policy C5: Air quality

Policy C6: Cordon sanitaire

Policy C7: Fall prevention from taller buildings

Policy C8: Changing places toilets

D: Historic Environment

Policy D1: Historic environment

Policy D2: Recording and advancing understanding of heritage assets

Policy D3: Buildings of local importance

Policy D4: Shopfronts, shutters and signs

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

E: Natural Environment

Policy E1: Landscape character and sensitivity

Policy E2: Biodiversity and geodiversity

Policy E3: Nature Recovery Area

Policy E4: Trees, woodlands and hedgerows

Policy E5: Green Infrastructure: building with nature

Policy E6: Flooding, sustainable drainage and wastewater

Policy E7: Renewable energy potential of River and Canal

Policy E8: Development affecting Cotswold Beechwoods Special Area of Conservation

F: Design

Policy F1: Materials and finishes

Policy F2: Landscape and planting

Policy F3: Community safety

Policy F4: Gulls

Policy F5: Open plan estates

Policy F6: Nationally prescribed space standards

G: Sustainable Living, Transport & Infrastructure

Policy G1: Sustainable transport

Policy G2: Charging infrastructure for electric vehicles

Policy G3: Cycling

Policy G4: Walking

Policy G5: Broadband connectivity

Policy G6: Telecommunications infrastructure

Policy G7: Water efficiency

Policy G8: Review mechanism

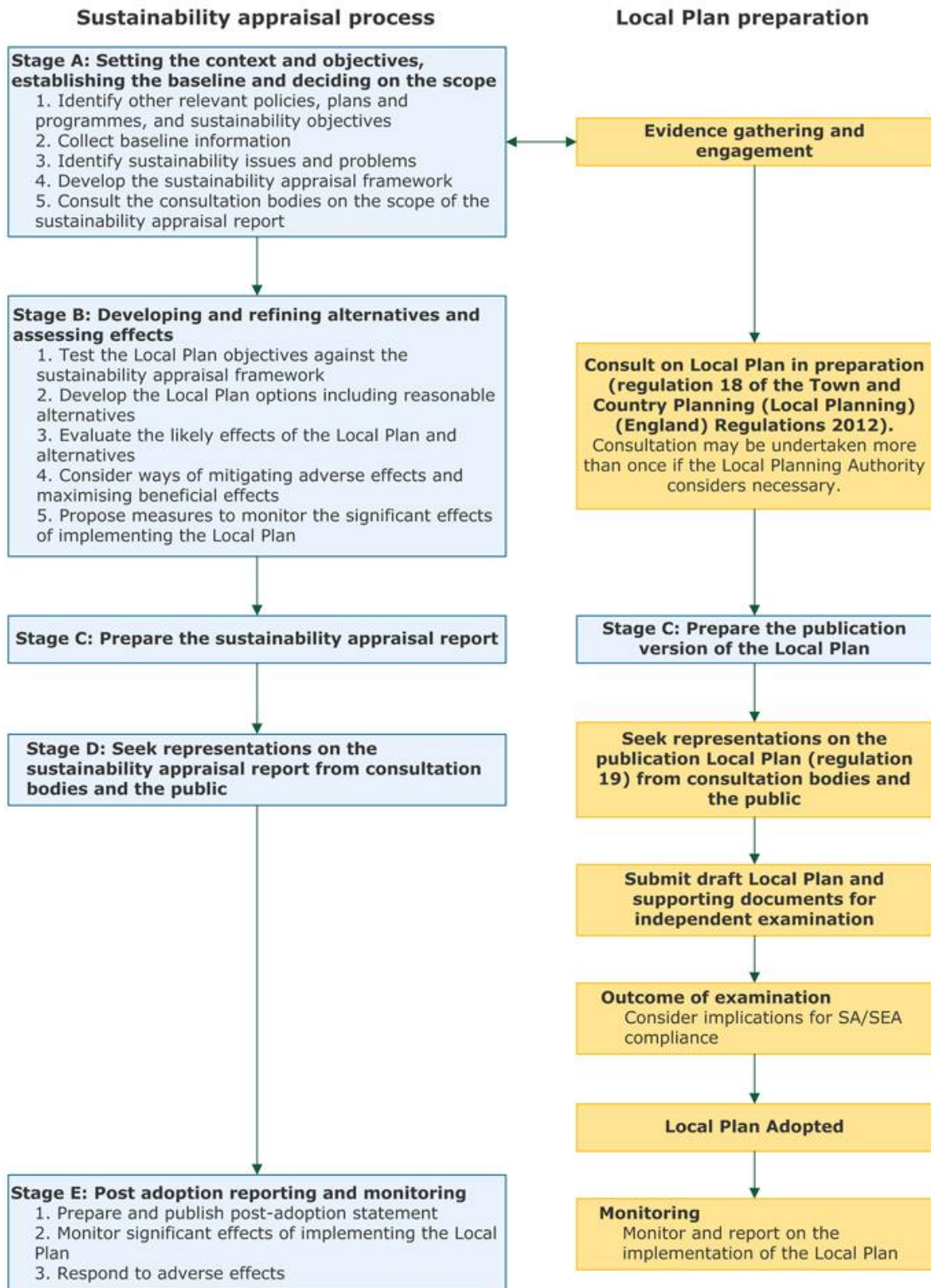
Site Allocations SA01- SA22

Inter-Relationships between SA & Plan-Making Processes

- 1.15 National Planning Practice Guidance¹⁰ sets out the key stages and tasks for SA and their inter-relationships with plan-making stages and tasks – as set out in the diagram following:

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

Figure 1.1: SA and Plan-Making Stages and Tasks



1.16 Sustainability Appraisal is an iterative and ongoing process that informs plan-making by assessing developing elements of the Plan, evaluating and

describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. As the plan develops, stages and tasks in the SA process may be revisited, updated or refreshed in order to take account of updated or new evidence, as well as consultation representations.

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

Consultation: Statutory, Public & Stakeholder Engagement

- 1.18 As part of the early preparation of the GCP, consultation on the emerging elements of the plan and initial SA work was undertaken in 2011, 2012 and 2013. The consultation responses can be found on the Council website¹¹. The initial draft GCP was subject to Regulation 18 consultation during January-February 2017. The SA/SEA and HRA were subject to consultation with the environmental statutory bodies (Historic England, the Environment Agency, and Natural England), as well as other stakeholders and the public. Comments received were taken into consideration and are recorded in this SA Report at Appendix VI. Thus, at each stage of the plan development, the accompanying SA Reports were published.
- 1.19 The SA studies and findings continue to inform the ongoing development of the GCP and comprise part of the evidence base for the emerging plan. SA Reports will accompany the subsequent stages of the GCP as set out in the following Table 1.1 with the chronology of the GCP preparation, consultation and the accompanying SA/SEA stages:

Table 1.1: GCP and SA/SEA Stages and Documents

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

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

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

Summary of Compliance with the SEA Directive & Regulations

- 1.20 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process, as for this integrated appraisal of the GCP), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. The requirements for reporting the SEA process are set out in Appendix I of this SA Report.

Structure of this Sustainability Appraisal Report

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

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

2.0 SUSTAINABILITY APPRAISAL METHODS

Introduction

- 2.1 Sustainability (Integrated) Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback from consultation. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of appraisal/assessment processes (and see also later Figure 4.1) that align with the hierarchy of plans – from international, national and through to local. SEA sets the context for subsequent project level studies during Environmental Impact Assessment (EIA) for major development projects. This tiering is acknowledged in the NPPF in paragraphs 31 and 35 in that the preparation of policies should be proportionate and supported by proportionate evidence.
- 2.3 The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy is a strategic planning document that provides strategic policy and allocations to guide promoters, communities and the three Councils in their decisions regarding proposed development. The Gloucester City Plan is a lower level planning document that is in conformity with the Joint Core Strategy and national planning requirements.
- 2.4 This SA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive, the findings from the Habitats Regulations Assessment (HRA), and the findings of the Equality and Diversity Impact Assessment (EqIA). Since the HRA and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are also provided separately to clearly demonstrate compliance.

Scoping and the SA Framework

- 2.5 Initial SA work (published 2012)¹² undertaken by Gloucester City Council built upon existing work already undertaken as part of the SA prepared for the previous development plan process and the emerging GCT JCS (updated & published 2013). In June 2016 (and still at the early stages of the draft GCP preparation) independent specialist consultants at Enfusion Ltd were commissioned by the Council to review and update the SA undertaken so far. Relevant plans and programmes (PP) were reviewed and baseline information was updated and analysed to ensure that key issues, problems and opportunities for the area are identified. The details of this updating and

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

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

- 2.6 The existing framework of SA Objectives was reviewed and updated to ensure that all key issues and opportunities identified in the baseline and PP updates are considered. The review of the SA Objectives can be found in Appendix II of this SA Report. This revised SA framework of objectives now includes detailed thresholds of significance for appraisal of site options, aims to promote and/or protect sustainability factors that are relevant to Gloucester City and the timescale for implementation (in the period up to 2031). The SA framework forms the basis against which emerging elements of the GCP are appraised using both quantitative and qualitative assessment from the evidence base and professional judgement. The final SA Framework of Objectives and thresholds of significance is set out in the following Table 2.1 (*including cross-references in italics for the topics in the SEA Directive and key requirements in the NPPF*).
- 2.7 The categories of significance used with the SA Framework are the same as that used for the SA of the JCS and as set out in the key below.

Table 2.2: SA Significance Key

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

Table 2.1: SA Framework

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest. 	<p>1. Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest</p> <p>Relevant JCS SA Objective: 1</p>	<p>The nature and significance of effects against SA Objective 1 primarily relate to the potential effects on designated biodiversity.</p> <p>Is the site within, adjacent to, or in close proximity (200m) to any nationally designated biodiversity (SSSIs)?</p>	++	<p>Development at the site option will deliver biodiversity gains, or improve ecological corridors / connections to strategic GI, or development will address a significant existing sustainability issue relating to biodiversity.</p>
		<p>Is the site within, adjacent to, or in close proximity (200m) to any biodiversity sites designated as being of local importance (Local Wildlife Site, Local Nature Reserve, Geological Site)?</p>	+	<p>Development will not lead to the loss of an important habitat, species, trees and hedgerows or lead to fragmentation of ecological corridors and there are potential opportunities to enhance biodiversity.</p>
		<p>It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on designated biodiversity that may be some distance away.</p>	0	<p>Development at the site is not likely to have negative effects on any nationally or locally designated biodiversity or contribute towards a severance of green and blue infrastructure or impede the migration of biodiversity. Potential for a neutral effect OR Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation possible, potential for a residual neutral effect.</p>
			?	<p>Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.</p>

Key Issues	SA Objective(s)	Significance Criteria:					
<ul style="list-style-type: none"> ■ There is a need to ensure carbon emissions are minimised 		<p>The findings of the HRA will also inform the appraisal of site options.</p> <p>Evidence / Data Source: DEFRA Magic Map and GIS map layers of local biodiversity designations supplied by Gloucester City Council</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #ffff00; text-align: center; width: 50px;">-</td> <td style="padding: 5px;">Development at the site option has the potential for negative effects on sites designated as being of local importance, or will lead to the loss of important habitats or fragmentation/severance of the connectivity of ecological corridors. or Development at the site has the potential for negative effects on nationally designated sites. Mitigation possible, potential for a minor residual negative effect.</td> </tr> <tr> <td style="background-color: #ffcc00; text-align: center;">--</td> <td style="padding: 5px;">Development at the site has the potential for negative effects on a nationally designated site. Mitigation difficult and / or expensive, potential for a major residual negative effect.</td> </tr> </table>	-	Development at the site option has the potential for negative effects on sites designated as being of local importance, or will lead to the loss of important habitats or fragmentation/severance of the connectivity of ecological corridors. or Development at the site has the potential for negative effects on nationally designated sites. Mitigation possible, potential for a minor residual negative effect.	--	Development at the site has the potential for negative effects on a nationally designated site. Mitigation difficult and / or expensive, potential for a major residual negative effect.
	-	Development at the site option has the potential for negative effects on sites designated as being of local importance, or will lead to the loss of important habitats or fragmentation/severance of the connectivity of ecological corridors. or Development at the site has the potential for negative effects on nationally designated sites. Mitigation possible, potential for a minor residual negative effect.					
	--	Development at the site has the potential for negative effects on a nationally designated site. Mitigation difficult and / or expensive, potential for a major residual negative effect.					
<p>2. Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources</p> <p>Relevant JCS SA Objective: 2, 6</p>	<p>It is assumed that any potential site option could meet energy efficiency standards, using sustainable construction methods. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 2, and this SA Objective will not be a key differentiator between site options.</p>						
<p>3. Improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change.</p> <p>Relevant JCS SA Objective: 3</p>	<p>It is assumed that any potential site option could meet sustainable design and construction standards. Biodiversity and green infrastructure networks are considered against SA Objectives 1 and 19-20. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 3, and this SA Objective will not be a key differentiator between site options.</p>						

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> ■ There is a requirement to maintain and improve the ecological status of the River Basin. 	<p>4. Reduce water use and conserve and improve the quality of water bodies in the Plan area</p> <p>Relevant JCS SA Objective: 5, 6</p>	<p>It is assumed that development at any of the site options can contribute to minimising the demand for and use of water.</p> <p>The nature and significance of the effects against SA Objective 4 will therefore primarily relate to the location of the site option in relation to the Surface Water Safeguard Zone and the potential effects of development on water quality.</p> <p>The SA assumes that development at any of the sites can incorporate aspirational water efficiency measures and that any proposal can make appropriate and timely provision for necessary supporting infrastructure, including waste water treatment.</p> <p>As water quality within the Gloucester Tributaries is largely affected by urban and transport effects, the findings for SA Objective 6 will also influence the</p>	++	A major positive effect is not considered possible.
			+	The site option is not located within a Surface Water Safeguard Zone and will not lead to any negative effects on water quality.
			0	The site option is located within a Surface Water Safeguard Zone, mitigation is available to ensure that there will be no significant negative effects, with the potential for a residual neutral effect.
			?	There is an element of uncertainty until lower level assessments have been completed.
			-	Development at the site option has the potential for negative effects on water quality, mitigation is available, potential for a residual minor negative effect.
			--	Development at the site option has the potential for major negative effects on water quality, mitigation may be expensive / difficult, potential for a residual major negative effect.

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

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> ■ There is a need to encourage a move away from the dependence on the private motor car ■ High levels of in-commuting ■ Certain areas suffer from traffic congestion and poor air quality 				risk, or at risk of surface water flooding in parts of the site. The areas of flood risk would be difficult to avoid, and mitigation is likely to be expensive/ difficult.
			--	The site option is located wholly within an area of flood risk or at risk of surface water flooding across the entire site.
	<p>6. Reduce the need to travel and maximise the use of sustainable modes of transport</p> <p>Relevant JCS SA Objective: 8</p>	<p>This SA Objective will address two separate issues relating to transport and movement; the first being site access and potential impacts on the highways network, and the second being the accessibility of sustainable modes of transport.</p> <p>6a) The nature and significance of the effects against SA Objective 6a will primarily relate to site access and impacts on the highways network.</p> <p>Given existing site assessment work undertaken as part of the SHLAA, the SA assumes that appropriate access can be provided for at any of the site options which have made it to this stage of assessment; however, if any new evidence suggests that</p>	++	Development at the site option has the potential to significantly enhance the highways network, which will reduce levels of traffic in an area that is experiencing congestion issues.
			+	Development at the site option has the potential to enhance the highways network, which will reduce levels of traffic.
			0	The site option is well located in respect of the road network and vehicle movements. Whilst development at the site has the potential to increase traffic, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect.
			?	There is an element of uncertainty, most likely until lower level assessments have been carried out.
			-	Development has the potential to increase traffic in the

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>access may be a significant issue then this will be noted within the summary appraisal narrative.</p> <p>In the absence of detailed traffic modelling of the site options judgements on the nature and significance of the effect against this SA Objective will primarily relate to the capacity of the site. Sites delivering over 100 new dwellings / 1ha of employment land are considered to have the potential for effects of greater significance.</p> <p>Evidence / Data Sources: Officer input, traffic modelling (when available)</p>		<p>surrounding road network and the site is not well located in respect of the road network and vehicle movements. Mitigation available, potential for a residual minor negative effect.</p>
		--	<p>Development is likely to increase the levels of traffic in an area that is already experiencing congestion issues (particularly within an AQMA), and the site is not well located in respect of the road network and vehicle movements. Mitigation difficult and/or expensive, potential for a residual major negative effect.</p>	
		++	<p>The site option is within reasonable walking distance (800m) to all four of the assessed modal choices.</p>	
		+	<p>The site option is within reasonable walking distance (800m) to at least a mode of public transport (train or bus) and a free mode of transport (cycle path or PRoW)</p>	
		0	<p>A neutral effect is not considered possible.</p>	
	<p>6b) The nature and significance of the effects against SA Objective 6b will primarily relate to the distance of the site from existing sustainable transport modes (train, bus, pedestrian and cycling routes).</p> <p>The SA assesses access to four different modal choices;</p>			

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>train, bus, cycle routes and Public Rights of Way.</p> <p>A reasonable walking distance of 800m has been utilised in the assessment ¹³.</p> <p>Distances will be measured using a buffer zone of the set reasonable walking distance calculated from the site boundary within ArcGIS. It is recognised however that the distance by buffer zone is not the only aspect to consider in accessibility, and as such the narrative will note if potential barriers to movement, or poor quality infrastructure is likely to restrict the potential use of the mode.</p> <p>The SA assumes that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport.</p> <p>Evidence / Data Source: GIS map layers supplied by Gloucester City Council</p>	<p>?</p> <p>-</p> <p>--</p>	<p>There is an element of uncertainty, for example the quality of the route is questionable, most likely until lower level assessments have been completed.</p> <p>The site is not within reasonable walking distance (800m) to three out of four of the assessed modal choices, or the site is not within reasonable walking distance (800m) to a mode of public transport (bus or train).</p> <p>The site is beyond reasonable walking distance (800m) to all four of the assessed modal choices.</p>

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

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

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> ■ Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings 	Relevant JCS SA Objective: 5	Objective 8 will relate to townscape / landscape sensitivity and the potential effects of development on townscape / landscape character.	townscape/landscape or removes a significant eyesore and/or would regenerate previously developed land / buildings (PDL) that is currently having a major negative effect on the townscape/ landscape.	
		The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.	+	Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the townscape/ landscape.
		It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out through planning applications.	0	A neutral effect is not considered possible.
		The SA assumes that any trees protected by Tree Preservation Orders within a site option will be retained, unless there is evidence to suggest that this is not the case.	-	The site option has medium to high sensitivity in townscape/landscape terms.
			--	The site option has high sensitivity in
			?	Element of uncertainty exists until more detailed lower level assessments have been carried out.

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest. 		<p>In the absence of key townscape sensitivity evidence, the nature and significance of the effects against this SA Objective will primarily relate to whether the site is greenfield land or brownfield land, and whether development would regenerate existing structures that detract from the townscape.</p> <p>Evidence / Data Source: Officer input, Townscape Sensitivity Study (when available)</p>		<p>townscape/landscape terms and / or is located within the setting of the AONB. Mitigation is likely to be difficult/expensive. Potential for a residual major negative effect.</p>
	<p>9. Protect and enhance the distinctive townscape quality and historic heritage and its setting.</p> <p>Relevant JCS SA Objective: 5, 7</p>	<p>The nature and significance of the effects against SA Objective 9 will primarily relate to designated heritage assets (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Areas of Archaeological Potential & Importance) and their setting. Any important non-designated heritage assets will be noted within the appraisal commentary.</p> <p>Are there any designated heritage assets or their</p>	++	<p>Development at the site option has the potential for a major positive effect on the significance of a designated heritage assets and / or its setting.</p>
	+	<p>Development at the site option has the potential for minor positive effects as it may secure appropriate new uses for unused Listed Buildings and / or enhance the setting of, or access / signage to designated assets.</p>		
	0	<p>Development at the site option will have no significant effect. This may be because there are no heritage assets within the</p>		

Key Issues	SA Objective(s)	Significance Criteria:	
		<p>setting, which could be affected within or adjacent to the site?</p> <p>Are there any opportunities to enhance heritage assets, such as: securing appropriate new uses for unused Listed Buildings; the removal of an eyesore could have a positive effect on the setting of designated assets; improved access and signage?</p> <p>The SA will also consider the nature and significance of the effects identified against the topic Townscapes / Landscapes in terms of the setting of designated heritage assets.</p> <p>The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed</p>	<p>influence of proposed development, or that mitigation measures are considered to reduce negative effects with the potential for a residual neutral effect.</p>
			<p style="text-align: center;">?</p> <p>Element of uncertainty until more detailed lower level surveys and assessments have been carried out.</p>
			<p style="text-align: center;">-</p> <p>Development has the potential for a residual minor negative effect on designated heritage asset(s) and/ or their setting.</p>
			<p style="text-align: center;">--</p> <p>Development has the potential for a residual major negative effect on designated heritage asset(s) and/ or their setting. Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect.</p>

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> ■ There is a national requirement to minimise waste production and waste sent to landfill. ■ <i>Previously developed land may be subject to contamination</i> ■ <i>Certain areas of the City suffer from traffic congestion and poor air quality.</i> 		<p>lower level surveys and assessments have been carried out.</p> <p>Evidence / Data Source: National Heritage List for England, DEFRA Magic Map, and GIS map layers supplied by Gloucester City Council.</p>		
	<p>10. Minimise the volume of waste created and promote the waste hierarchy (reduce, reuse, recycle)</p> <p>Relevant JCS SA Objective: 9</p>	<p>It is assumed that development at any of the site options could minimise the creation of waste and promote the waste hierarchy. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 10, and this SA Objective will not be a key differentiator between site options.</p>		
	<p>11. Improve air quality, reduce noise and light pollution and reduce the amount of contaminated land</p> <p>Relevant JCS SA Objective: 5, 6, 9</p>	<p>Air quality is closely linked to traffic, and as such the potential direct effects of development at a site option on traffic (appraised in SA Objective 6a) are considered to lead to indirect effects of the same nature and significance on air quality. Therefore, to avoid duplication, the appraisal does not assess the effects on air quality separately against this SA Objective.</p>	++	<p>A major positive effect is not considered possible.</p>
		<p>It is assumed that any potentially contaminated land would be investigated and if necessary remediated prior to development, as a result contaminated land will</p>	+	<p>Development at the site could address an existing amenity issue for neighbouring land uses.</p>
		0	<p>Development at the site is not likely to be affected by any conflicting neighbouring land uses, or affect the amenity of a sensitive neighbouring land use. Potential for a residual neutral effect if there is suitable mitigation available to address minor negative effects.</p>	

Key Issues	SA Objective(s)	Significance Criteria:		
		<p>not determine the nature and significance of the effects against this SA Objective, however the appraisal summary will note if there is the potential for contaminated land to be present at a site option.</p> <p>It is assumed that any potential noise and light pollution arising from development, particularly during construction, can be mitigated through the development management process, to include the provision of a Construction Environmental Management Plan (CEMP) where necessary.</p> <p>The nature and significance of the effects against SA Objective 11 will therefore primarily relate to any potential conflicting neighbouring land uses. Evidence / Data Source: Google Maps & Officer input</p>	?	An element of uncertainty exists until more detailed site level assessments have been undertaken.
			-	Development at the site could potentially be affected by neighbouring land uses and/or could affect the amenity of a sensitive neighbouring land use.
			--	Development at the site could potentially be significantly affected by neighbouring land uses and/or could significantly affect the amenity a sensitive neighbouring land use.
			++	Potential for the site option to accommodate a strategic level of employment development (equal to or more than 1ha).
	12. Ensure the availability of employment land and premises to secure future prosperity potential	The nature and significance of the effects against both SA Objective 12 and 13 will primarily relate to the	++	Potential for the site option to accommodate a strategic level of employment development (equal to or more than 1ha).

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> ■ Need to plan for and protect quality employment land and ensure a future supply ■ There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry ■ There are older, less attractive employment areas 	Relevant JCS SA Objective: 10	capacity of the site to accommodate new employment development Evidence / Data Source: Officer input	+	Potential for the site option to accommodate employment development (less than 1ha).
	0		If no employment is being proposed as part of development, as it is a housing site option, then it is considered to have a neutral effect against this SA Objective.	
	?		There is an element of uncertainty as the capacity of the site option for employment development is unknown.	
	-		Development at the site option may result in a net loss of existing employment.	
	--		Not applicable.	
<ul style="list-style-type: none"> ■ Poor retail provision compared to the size of Gloucester's shopper population ■ Limited early hours / evening economy ■ Lack of overnight tourist visitors 	13. Support the economy by helping new and existing businesses to fulfil their potential Relevant JCS SA Objective: 10	The SA assumes that any proposal for development can make appropriate and timely provision or contributions for necessary supporting infrastructure, including community facilities and services. The nature and significance of the effects against SA Objective 14 will primarily relate to the distance of the	++	The site option is located within reasonable walking distance (800m) of all / the majority of key services and facilities located within the City centre
	14. Support the vitality and viability of the city centre as a retail, service, leisure and learning destination and local centres that support local needs. Relevant JCS SA Objective: 11		+	The site option is located within reasonable walking distance (800m) of all / the majority of key services and facilities located within the a local centre
	0		A neutral effect is not considered possible.	

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

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

Key Issues	SA Objective(s)	Significance Criteria:		
	15. Integrate sustainable construction principles and standards into all development schemes Relevant JCS SA Objective: 2, 3	It is assumed that development at any of the site options could meet sustainable construction standards. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 15, and this SA Objective will not be a key differentiator between site options.		
<ul style="list-style-type: none"> ■ <i>There is a need to ensure carbon emissions are minimised</i> ■ There are inequalities in opportunity across the Plan area ■ 'Pockets' of acute deprivation exist in some parts of the City 	16. Reduce inequalities in wellbeing and opportunity Relevant JCS SA Objective: 12	The nature and significance of the effects against SA Objective 16 will primarily relate to the provision of development in Gloucester LSOAs in the 10-30% most deprived areas in England¹⁵ . Evidence / Data Source: DCLG Indices of Deprivation	++	The site will deliver new housing or employment land within the most deprived 10-30% LSOAs in England.
			+	The site will deliver new housing or employment land in an area outside of the identified LSOAs in the most deprived 10 to 30% in England.
			0	A neutral effect is not considered possible.
			?	An element of uncertainty exists until lower level assessments have been carried out
			-	A minor negative effect is not considered possible

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

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> High levels of obesity in both adults and children 			--	A major negative effect is not considered possible
	<p>17. Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities</p> <p>Relevant JCS SA Objective: 14</p>	<p>The nature and significance of the effects against SA Objective 17 will primarily relate to the distance of the site from existing health facilities and promoted walking routes¹⁶.</p> <p>A reasonable walking distance of 800m has been utilised in the assessment ¹⁷.</p> <p>Evidence / Data Source: GIS map layer supplied by Gloucester City Council</p>	++	The site option is located within a reasonable walking distance (800m) of both existing health facilities and promoted routes OR Evidence suggests that development at the site option has the potential to deliver new health facilities
			+	The site option is located within reasonable walking distance (within 800m) of existing health facilities
			0	A neutral effect is not considered possible.
			?	There is an element of uncertainty until lower level assessments have been carried out.
			-	The site option is located beyond reasonable walking distance (over 800m) to existing health facilities

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

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

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

Key Issues	SA Objective(s)	Significance Criteria:		
<ul style="list-style-type: none"> The City needs to protect areas of public open space and green corridors/networks and provide a comprehensive, connected and accessible network of spaces. 	Relevant JCS SA Objective: 16	relate to the accessibility of open space and green space in relation to the site option, as well as the potential for development to result in a net loss / net gain in open or green spaces. A reasonable walking distance of 800m has been utilised in the assessment ¹⁸ . Evidence / Data Source: GIS map layer supplied by Gloucester City Council.		
	20. Maximise opportunities for the creation of new and enhancement of existing open spaces in accessible and connected locations		+	The site option is located within reasonable walking distance (800m) of existing open / green space
	Relevant JCS SA Objective: 16		0	A neutral effect is not considered possible.
			?	There is an element of uncertainty until lower level assessments have been carried out.
			-	The site option is located beyond reasonable walking distance (800m) to existing open / green space
			--	Development at the site option would result in a net loss of open / green space
	21. Reduce crime and the fear of crime		It is assumed that development at any of the site options could incorporate secured by design standards ¹⁹ . It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 21, and this SA Objective will not be a key differentiator between site options. Relevant JCS SA Objective: 13	
22. Encourage everyone to participate in local decision making	It is assumed that development at any of the site options could encourage people to participate in local decision making. It is therefore assumed that all site options have the potential for minor positive effects against SA Objective 22, and this SA Objective will not be a key differentiator between site options. Relevant JCS SA Objective: N/A			

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

¹⁹ Secured by Design Homes 2016; Official Police Security Initiative

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

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

Appraising the Draft Gloucester City Plan (GCP)

- 2.7 The draft Vision for the GCP was appraised against the SA Objectives for sustainable development. A compatibility analysis of the proposed issues for GCP Objectives/Key Principles with the SA Objectives was undertaken and the findings reported here in summary in section 5 with the details provided in Appendix III.
- 2.8 Each emerging element of the GCP was appraised against the full SA Framework of objectives and decision-aiding questions using professional judgment and available evidence. Where possible and appropriate, specified qualitative and quantitative thresholds were used to define the five categories of significance of effects (major/minor negative; neutral; major/minor positive). The assessment of effects considered the nature of the likely sustainability effects, including positive/negative; short-medium term (5-10 years)/long term (10-20 years plus); permanent/temporary; secondary, cumulative and synergistic, were described in accordance with Schedule 2 of the SEA Regulations
- 2.9 Each potential site option/proposed allocation was appraised against the full SA Framework of Objectives using professional judgment and the baseline evidence. Where possible and appropriate, specified qualitative and quantitative thresholds were used to define five categories of significance of effects (major and minor negative; neutral; major and minor positive). The assessment of effects considered the nature of the likely sustainability effects, including positive/negative, short-medium term (5-10 years)/long term (10-20 years plus), permanent/temporary, direct/indirect, cumulative and synergistic, were described in accordance with Schedule 2 of the SEA Regulations.
- 2.10 An appraisal commentary was provided on how the site option would progress SA Objectives, and where appropriate, recommendations for enhancement and mitigation were provided. Detailed SA matrices for site options/proposed allocations are provided in Appendix IV of this SA Report and summary findings are set out in sections 4, 5 & 6. Where uncertainty or gaps in information were apparent, this was recorded.
- 2.11 The SA of the Draft GCP, including policies, is structured under topic headings that are linked to the Objectives in the SA Framework as well as topics in the SEA Directive, and the relevant Gloucester City Plan Topic Papers. This provides a framework and structure to evaluate the likely significant effects of the Draft GCP against these key topics. The Policies, proposed Site Allocations, and the overall likely effects of implementing the plan as a whole, were appraised by sustainability topics as follows:
- Housing
 - Economy and Employment
 - Health & Equality
 - Transport & Accessibility
 - Air Quality

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

2.12 The SA is informed by the best available information and data. However, data gaps and uncertainties exist, and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments, or design aspects, that are more appropriately undertaken at the next stage of planning – at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level. Therefore, a precautionary approach that seeks to deliver good practice mitigation and adaptation is the most appropriate approach.

Consultation

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

3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

Introduction

- 3.1 Initially the SA built upon previous scoping work to identify the key issues and opportunities for the Gloucester Plan area and including the JCS Scoping Report (2008, updated in 2012). Baseline information and plan/programme (PP) reviews were updated in 2011 and 2012/13. This information is also supported by detailed Ward Profiles which accompanied the City Plan Part 2.
- 3.2 Independent specialist consultants, Enfusion, were commissioned by the Council in June 2016 to review and progress the SA of the GCP. As part of this review the baseline information and PP review were further updated to take account of more recent evidence and any new issues or opportunities arising. This section presents the updated PP review with a summary of the implications for the GCP, and updated baseline information including the likely evolution without the Plan. Key issues and opportunities were also updated in line with this evidence and discussed in the following paragraphs; this informed the refinement of the SA frameworks that form the basis for assessment.

Review of Relevant Plans & Programmes (PP)

- 3.3 In order to establish a clear scope for the SA of the Gloucester City Plan (GCP), it is necessary (and a requirement of SEA) to review and develop an understanding of the wider range of plans and programmes that are relevant to the Plan. This includes International, European, National, Regional, and Local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the GCP could help fulfil them.
- 3.4 The GCP will sit beneath, and be in conformity with, a higher level strategic plan (the Joint Core Strategy) covering the areas of Gloucester City, Cheltenham Borough, and Tewkesbury Borough. A PP Review was undertaken during the scoping stage (2008) of the SA of the higher level GCT JCS. This was updated in 2011 (JCS Preferred Options stage), and subsequently 2012/13. The 2008 GCT JCS Scoping Report has been prepared to cover the appraisal of the JCS itself, and any subsequent documents prepared by the JCS authorities that would sit beneath the JCS, including the GCP. This information builds upon an initial SA Scoping Report undertaken in 2005 by Gloucester City Council to support its previous development plan.
- 3.5 It was not considered necessary to duplicate the work already done, and as such the updated PP draws upon the JCS work for key regional to national plans and focuses on local information relevant to Gloucester City. International plans/programmes have been transposed into national plans, policy and legislation.

National:

- DCLG, National Planning Policy Framework (NPPF), 2012, updated 2018 - the NPPF is the overarching planning framework which provides national planning policy and principles for the planning system in England.
- Defra, 2018 A green Future: Our 25 Year Plan to Improve the Environment – includes proposed actions for using land sustainably, recovering nature & enhancing landscapes, improving health & wellbeing, increasing resource efficiency, reducing pollution & waste, securing healthy and biologically diverse seas & oceans.
- DCLG, Planning Policy for Traveller Sites, 2015 - to be read in conjunction with the NPPF, this policy document sets out the Government's planning policy for traveller sites to ensure fair and equal treatment for travellers
- Environment Agency, Managing Water Abstraction, 2013 - is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies; Defra Abstraction Reform Report 2019.
- The Heritage Alliance, Heritage 2020 - the historic environment sector's plan for its priorities between 2015 and 2020.
- Historic England, Corporate Plan 2018-2021 - the Plan is the delivery document.
- Defra, Biodiversity 2020 - A strategy for England's wildlife and ecosystem services, 2011 - the strategy builds on the Natural Environment White Paper and implements international and EU biodiversity commitments. It sets out the strategic direction for biodiversity policy on land and at sea.
- Defra, Waste Management Plan for England, 2013 - the plan sets out the measures for England to work towards a zero-waste economy.
- Public Health England, Strategy to 2020 – identifies health strategic priorities over the 4-year period and delivery mechanisms to achieve them.
- National Infrastructure Delivery Plan 2016-2021 - brings together the Government's plans for economic infrastructure over the next 5 years with those to support delivery of housing and social infrastructure.
- DBEI, 2050 Pathways 2013 - sets out how the UK will implement the Energy Efficiency Directive and help to achieve the EU 20% energy saving target for 2020.
- DBEI 2018 Leading the way to a low carbon future
- DBEI 2019 the UK's Draft Integrated National energy & Climate Change Plan (NECP)
- Defra, Clean Air Strategy 2019 – to reduce air pollution from industry, agriculture and transport emissions.

Regional:

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

- Defra, Welsh Government, Natural Resources Wales and Environment Agency, Severn River Basin District River Basin Management Plan, December 2015 - provides a framework for protecting and enhancing the benefits provided by the water environment.
- River Severn basin District: Flood Risk Management Plan 2015-2021 - identifies the scale and extent of flooding in the River Severn catchment, now and in the future, setting policies for the management of flood risk.

Local:

- Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, adopted December 2017 - overarching development plan for the Gloucester, Cheltenham and Tewkesbury plan areas, including strategic site allocations and development management policies.
- GFirst Local Enterprise Partnership, Strategic Economic Plan 2018 - outlines plans to drive growth with the Growth Hub, GREEN a centre of excellence in renewable energy, engineering and nuclear skills, and Farm491 for agri-tech.
- Gloucester City Council, Economic Growth Strategy, 2018 - 2021 - sets out the ambitions for Gloucester, and key future regeneration projects including Kings Quarter, Bakers Quay, and Blackfriars.
- GFirst LEP Gloucestershire Energy Strategy 2019 for progressing low carbon economy.
- Gloucestershire County Council and Gloucester City Council, A Plan for the Air Quality Management Areas at Priory Road, Painswick Road and Barton Street in the City of Gloucester, 2011 - details recommendations for improving air quality in the City and identifies future traffic and air quality monitoring and review needs. Reviews published in 2014 & 2018.
- Gloucester City Council, Open Space Strategy, 2014 - 2019 - the Council's strategy to protect, manage and enhance its open spaces over the 5-year timeframe and beyond.
- Gloucestershire County Council, Gloucestershire Waste Core Strategy, 2012 - sets policy and objectives for waste management in Gloucestershire in the period 2012 - 2027.
- Gloucestershire County Council, Minerals Local Plan 2018-2032 - sets the framework for the future supply of minerals in Gloucestershire.
- Gloucestershire Local Transport Plan 2015-2031
- Gloucester Playing Pitch Strategy, 2015-2025 - provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities.
- Gloucester City Council, Gloucester's Cultural Vision and Strategy, 2016 - 2026 - sets out the Council's ambitions and opportunities for the development of culture in the City.
- Growing Gloucester's Visitor Economy 2014 (Marketing Gloucester) – sets out a strategic plan for driving growth in the value of Gloucester's visitor economy.
- Gloucester City Council, Gloucester City Vision 2012-2022 – sets out the key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver.

- GCT JCS 2014 Green Infrastructure Strategy

Neighbourhood Plans

- Hempsted Neighbourhood Plan Area designated within the City

Implications for the GCP and SA

- 3.7 Development growth is likely to increase traffic on the roads with implications for air quality. Growth further has the potential to affect local biodiversity networks; designated and non-designated heritage and their settings; townscape character; and natural resources including water resources, quality and flooding. Employment growth may also enhance or detract from the vitality and viability of the city and town centres.
- 3.8 Growth therefore has the potential to affect a number of plans and strategies that seek to maintain and enhance these assets or grow the value of Gloucester's economies. The GCP and SA process can seek to minimise the potential negative effects of this through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport or other provisions and contributions from new development to ensure the capacity of services and facilities.
- 3.9 The GCP can support water efficiency and phasing of development to minimise effects on water resources, as well as ensure that water quality is maintained in the plan area. The GCP and SA should seek to identify opportunities to maximise the potential for alternative modes of transport to the car, reduce the need to travel, and therefore reduce emissions.
- 3.10 The GCP presents opportunities to support other existing plans and strategies, such as increased energy efficiency and waste minimisation measures for new development, as well as the promotion of renewable energy. The GCP can support reductions in inequalities and contribute to improving the overall well-being of communities.
- 3.11 The delivery of new housing, employment and supporting infrastructure, in sustainable and accessible locations can support existing and new communities by meeting local needs and addressing shortages. The GCP can encourage new development to support healthy and active lifestyles.
- 3.12 Overall, the SA process should inform the development of the Plan by helping to identify sensitive receptors and seek to ensure that adverse sustainability effects are minimised and opportunities for sustainable development with positive effects are maximised.

Baseline Conditions & Likely Evolution without the GCP

- 3.13 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the Plan area and providing the basis for predicting and

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

- 3.14 Government guidance²¹ advises a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the SA process guides plan making as new information becomes available. The baseline information provided below is structured around SEA themes; it draws upon the baseline information in the SA of the GCT JCS (Oct 2013 - Appendix IV) and builds upon the initial GCP SA Scoping Report prepared by Gloucester City Council (2005).

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

Communities

- 3.15 In 2014 the population of Gloucester was estimated to be 125,600²², demonstrating a continuing increasing trend since 2001²³. Gloucester will experience the greatest population growth of all the county districts, expected to increase by 20.1% or 23,800 people between 2010 and 2035²⁴. Gloucester is a relatively young city with 25% of the population aged 19 and under (highest in the South West) and 39% under 30. The city is expected to experience the greatest increase of Gloucestershire's districts in the number of children and young people between 2010 and 2035, with an increase of 16.4%²⁵.
- 3.16 In 2011²⁶, the majority of people in the Plan area lived in two people households, followed closely by single occupancy households. The housing stock in Gloucester was identified as 53,413 dwellings; 85.5% of which were private housing; 8.6% were local authority housing; and 5.9% were registered social landlord housing. The average rent charged for all registered social landlord dwellings was also higher than the South West and England average. 109 households between 2010 and 2011 were identified as Statutory Homeless. Although ward boundaries have been amended since the data was produced, evidence²⁷ suggests that the wards of Abbey, Elmbridge, Grange, Hucclecote and Longlevens contain high level of home ownership (over 80% of total households), compared to Kingsholm and Wotton, Podsmead and Westgate which contain the lowest levels of home ownership (below 50% of households). The highest levels of social renting were identified in the wards of Matson and Robinswood, and Podsmead, and the highest

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

²² NOMIS official labour market statistics

²³ ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

²⁴ Gloucester City Council (2016) Regeneration and Economic Development Strategy

²⁵ Ibid

²⁶ ONS, Neighbourhood Statistics: Gloucester Local Authority Key Figures for Housing

²⁷ ONS – 2011 Census

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

- 3.17 The majority of houses in the Plan area are semi-detached, followed by terraced housing and then detached housing. The majority of flats/apartments are purpose-built blocks of flats or apartments. In 2011 there was also a total count of 201 caravans or other mobile/temporary structures, and 200 shared dwellings.
- 3.18 ONS reported in 2011 that median house prices in the Plan area range from £222,000 for a detached house to £105,000 for a flat/maisonette. However, in 2016, Zoopla identify significantly higher average house prices paid in the last twelve months, ranging from an average price of £297,088 for a detached house to £118,208 for a flat. The SHMA identifies average property prices paid across the Gloucestershire County areas during 2009 and 2012 and demonstrates that the average property prices in Gloucester are significantly less than those found in the surrounding areas within the County (Cheltenham, Cotswold, Tewkesbury, Stroud and Forest of Dean).
- 3.19 The Centre for Cities Outlook 2014²⁸ identifies that Gloucester is ranked 2nd out of 63 cities for the highest housing stock growth. Among the top-placed cities, only five (Swindon, Milton Keynes, Gloucester, London and Peterborough) have experienced housing supply growth in accordance to their population growth rates.
- 3.20 The SHMA²⁹ identifies that the size of the private rented sector increased by over 70% in the County between 2001 and 2011. This substantial growth matches regional and national trends. Much of the growth of the private rented sector in Gloucestershire, has been from prosperous households unable to access home ownership, but also young adults remaining in shared accommodation in the sector for longer and also households requiring financial support (Local Housing Allowance) to afford a market home. It is estimated that in Gloucestershire County in 2013 27.4% of households in the private rented sector are supported by Housing Benefit or Local Housing Allowance, compared to around 25% nationally. The SHMA identifies that within Gloucestershire some 24.3% of all households in Gloucestershire are theoretically unable to afford market accommodation of an appropriate size in 2013, compared to 22.7% in 2009 (the previous SHMA).
- 3.21 Gypsy and Traveller policy is provided at the JCS level. Tewkesbury houses the largest Gypsy and Traveller site within Gloucestershire with 46 plots at the Willows, Sandhurst Lane. There are a further three sites in the County at Elmstone Hardwicke, Twynning (near Tewkesbury), and Culkerton (near Tetbury), providing a further 33 plots. There are no permanent Gypsy and Traveller sites within Gloucester. There is a temporary site with two pitches at Sims Lane in the south of the City, and a significant travelling showpeople community of Westend Parade in the north of the City.

²⁸ Centreforcities (2014) Cities Outlook 2014

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

- 3.22 The Cultural Strategy³⁰ identifies that Gloucester is developing its cultural capital through redevelopment and regeneration programmes. It recognises that Gloucester lags behind cities of similar size and status and does not compare especially well with regional neighbours. The Strategy identifies a lack of high quality arts and cultural provisions, and outside of the regenerated Docks area the night-time economy is more limited and tends to be targeted towards the under 25s. It further noted that despite outstanding heritage assets and investment, the visitor experience could be significantly enhanced. It is felt that the cultural sector in Gloucester generally is underdeveloped, fragmented and feels undervalued.
- 3.23 ONS crime statistics³¹ report that the most frequent type of crime committed in Gloucester during 2012 and 2013 was criminal damage and arson, followed by vehicle offences. Gloucester City Council have produced a design guide³² with seven main principles to deliver safety in design in new development.
- 3.24 Without the Plan there is likely to be a less coordinated approach to the delivery new employment, housing and infrastructure. New development is less likely to be delivered in areas where it is needed most, which could exacerbate inequalities and problems with affordability across the Plan area. It could also make it more difficult to effectively meet the needs of the community. The Local Plan provides an opportunity to set out specific policies for particularly sensitive communities that seek to address particular sustainability issues, and which could include requirements for new development in and around those areas.

Economy and Employment

- 3.25 In 2015³³, 84.4% of people in Gloucester were economically active, and there were a higher percentage of males that were economically active than females. 5.1% of people in the Plan area were unemployed. 15.6% of people were economically inactive of which 36.2% wanted a job, and 63.8% did not want a job. Of those in employment, the majority (38.1%) were in professional occupations (including managers, directors, senior officials, associate professional and technical), followed by administrative, secretarial and skilled trade occupations. Evidence³⁴ suggests that in 2011 Gloucester had a working population of 64,134 people, of which 22,300 came from outside of Gloucester but from within the region, and 3,799 came from outside of the region to access employment in Gloucester.
- 3.26 Over half of the people of Gloucester (aged 16-64) are educated to NVQ3 level and above, but 8.1% have no qualifications³⁵. The city boasts high performing schools and over 17,000 college and university students, and is

³⁰ Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

³¹ ONS, Neighbourhood Statistics: Gloucester Local Authority Crime and Safety

³² Gloucester City Council - Designing Safer Places

³³ NOMIS official labour market statistics

³⁴ Ibid.

³⁵ Ibid.

home to higher education campuses for the University of Gloucestershire, the University of the West of England and Gloucestershire College³⁶.

- 3.27 The median weekly pay for all full-time workers living in the area is £477.10, which is lower than both the average for the South West and for Great Britain³⁷. However, in line with national trends, male full-time workers on average earn more than female full-time workers, and male full-time workers in Gloucester earn higher than the average weekly wage for the South West (although still below the average for Great Britain). Female full-time workers living in the area however earn significantly less than the South West and Great Britain average (£382.40 per week, compared to £440.10 in the South West and £471.60 in Great Britain). In April 2016, 1,450 people (aged 16-64) in Gloucester were claiming out-of-work benefits, the majority of which were aged 25 to 49.
- 3.28 In 2015, a total of 3425 business enterprises were identified, located across 4520 local units. In line with regional trends, the majority of businesses in Gloucester are micro organisations (85.4%) consisting of 0 to 9 employees. 20 (0.6%) large organisations (employing over 250 people) were identified over 25 units. The Gloucestershire Strategic Economic Plan³⁸ identifies Gloucester as an urban cluster containing the key urban settlements and main business, commercial, educational, service and cultural centres for the county. Gloucester is home to advanced engineering companies (e.g. Prima Dental) and supports a strong finance and insurance cluster as well as a growing number of information security, web hosting, CAD/CAM development, defence communications and security, ICT infrastructure development and IT content management businesses. The creative community has grown rapidly in recent years, with the Blackfriars and Westgate Street areas having established themselves as a hub for creative businesses³⁹.
- 3.29 The Centre for Cities Outlook 2014 reports that Gloucester is ranked 2nd out of 64 cities for having the highest employment rate, and that Gloucester is in the top-ten cities where small businesses are investing in high growth strategies⁴⁰. Gloucester further attracts 5.9 million visitor trips each year and annually, visitor spend is £207 million⁴¹.
- 3.30 Regeneration underpins much of the significant recent development that has occurred in Gloucester and regeneration to date has been largely heritage-led (supporting sense of place and local character), with the restoration of, and new uses for, many historic buildings, including; Docks Warehouses, St Michael's Tower, Buildings at the Quays, Robert Raikes' House and 66 Westgate Street⁴². Phase 1 of the redevelopment scheme for King's Quarter is underway, which includes the development of a new modern bus station, linked with the adjacent train station. More significant projects that have recently been successfully delivered include:

³⁶ Gloucester City Council (2016) Regeneration and Economic Development Strategy

³⁷ NOMIS official labour market statistics

³⁸ GFirst LEP (2014) Strategic Economic Plan for Gloucestershire

³⁹ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁴⁰ Centreforcities (2014) Cities Outlook 2014

⁴¹ Gloucester City Council - Gloucester's Cultural Vision and Strategy 2016 - 2026

⁴² Gloucester City Council (2016) Regeneration and Economic Development Strategy

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

- 3.32 The City has a strong independent retail and leisure sector with over 100 independent city centre shops⁴³. The Retail Study⁴⁴ identifies that existing commitments are capable of accommodating some £80 million of convenience spending in 2031 and this more than off-sets the residual requirement. For comparison goods the residual expenditure in Gloucester for which additional floorspace is required, is £114.76 million. Gloucester City Council consider that evidence needs updating and it is noted that the JCS authorities will be preparing an immediate review of the JCS retail policy directly after it has been adopted. This will, amongst other things, set out a number of site allocations as part of the comprehensive city / town centre and retail strategy.
- 3.33 Without the Plan there is likely to be a less coordinated approach to the delivery new employment, housing and infrastructure. New employment and infrastructure is less likely to be delivered where it is needed most. This could affect the economic viability of the city. It could also reduce opportunities to address existing issues, such as out-commuting for employment and retail needs.

Health and Equalities

- 3.34 The health of people in Gloucester is varied compared with the England average. Deprivation is higher than average and about 19.3% (4800) children live in poverty. Life expectancy for men is lower than the England average. Life expectancy is 13.5 years lower for men and 10.6 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. It is evident therefore that inequalities exist in the Plan area. Evidence⁴⁵ further identifies that this is an increase from 2014, where life expectancy was 11.7 years lower for men and 9.2 years lower for women in the most deprived areas of Gloucester than in the least deprived areas.
- 3.35 The 2015 health profile identifies that in 2012, 30.3% of adults are classified as obese and in Year 6, 23% of children are classified as obese, both of which are worse than the average for England. Health indicators that were identified as worse than the average for England further include; the rate of alcohol related harm (for adults and under 18's); the rate of adult self-harm hospital stays; levels of adult physical activity; recorded diabetes; rates of sexually transmitted infections; rates of statutory homelessness; rates of long-term unemployment; and rates of drug misuse. Health indicators identified as better than the average for England include; levels of GCSE attainment; and the rate of people killed and seriously injured on roads.

⁴³ Ibid.

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

⁴⁵ Gloucester City Council (2016) Topic Paper; Health and Wellbeing

- 3.36 Public Health is managed at the county level, and the Gloucestershire Health and Wellbeing Strategy⁴⁶ identifies that key areas for improvement in health in the Gloucestershire County include:
- Reducing obesity
 - Reducing the harm caused by alcohol
 - Improving mental health
 - Improving health and wellbeing into older age
 - Tackling health inequalities
- 3.37 Gloucester is a diverse city, the black and minority ethnic population stands at 9.8% with approximately 100 languages and dialects spoken⁴⁷.
- 3.38 There are 45 formal children's play areas in the city and over £1 million was invested in upgrading these between 2009 and 2013⁴⁸. The city is home to various sporting facilities and activities including Gloucester Rugby, Oxstalls Sports Park, and Gloucester Rowing Club. Gloucester was one of the city's that hosted the 2015 Rugby World Cup. Investment in sporting facilities and activities is ongoing; the rowing club has secured £1.5 million funding for a new canalside boathouse, major refurbishment of the Blackbridge Jubilee Athletics Track has also created an all-weather floodlit synthetic track, and further outline planning consent have been given for new sporting facilities at the University of Gloucestershire⁴⁹. The Open Space Strategy⁵⁰ however identifies that access to formal sports and play provision is also not equally distributed across the city. The Playing Pitch Strategy⁵¹ further identifies shortfalls in provisions of football and rugby pitches and asserts that demand for cricket and hockey pitches is likely to increase (particularly due to potential hockey pitch loss).
- 3.39 The Gloucester Open Space Audit⁵² identified that the amount of public open space in the Plan area increased from 2.19 hectares per 1,000 population in 2001 to 2.35 hectares per 1,000 population in 2008. The Public Open Space Strategy⁵³ identifies that there are over 150 individual areas of public open space in the city covering 300 hectares, together with allotments, cemeteries, Robinswood Hill Country Park and Alney Island Local Nature Reserve, a total open space area of 521 hectares. This equates to just over 12% of the city's total land area which is publicly accessible green space. However, the Strategy identifies that open space is not equally distributed across the city, and in some areas access to good quality, local open spaces is particularly limited.

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

⁴⁷ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁴⁸ Gloucester City Council, Open Space Strategy, 2014 - 2019

⁴⁹ Gloucester City Council (2016) Regeneration and Economic Development Strategy

⁵⁰ Gloucester City Council, Open Space Strategy, 2014 - 2019

⁵¹ Knight, Kavanagh & Page (2015) Gloucester Playing Pitch Strategy 2015-2025

⁵² Gloucester City Council, Quantitative Open Space Audit, 2008

⁵³ Gloucester City Council Open Space Strategy 2014 - 2019

- 3.40 There are numerous countryside sites within Gloucester which provide leisure and recreational opportunities. Gloucester City Council identify the main sites as:
- Robinswood Hill Country Park, SSSI & Local Nature Reserve; 100 hectares of Cotswold countryside within 2 miles of the city centre.
 - Alney Island Local Nature Reserve; an important habitat for wetland flora and fauna within easy walking distance of the city centre.
 - Hucclecote Meadows SSSI and Local Nature Reserve; a remnant of Gloucester's historic hay meadows, with abundant wild flowers.
 - Quedgeley Local Nature Reserve; a former garden arboretum.
- 3.41 The City Plan can provide enhanced protection for Green Infrastructure networks, ensuring existing spaces are not lost to new development, and that new development contributes to enhancing assets, as well as seeking to achieve overall connectivity and equality of provision at the strategic scale. New development can be planned to ensure accessibility and increase opportunities for healthy and active lifestyles. The Plan can also strategically target planning gains at most deprived areas, and thus seek to reduce inequalities. The GCP can therefore ensure that the built environment contributes to delivering health benefits, and supports healthy, inclusive and active communities. Without a Plan in place development is less likely to deliver health benefits. There would also be an increased likelihood of negative effects on Green Infrastructure networks and existing facilities (for example through loss of undesignated areas or established facilities, or fragmentation of spaces), and less clarity over the type of provisions expected within new development.

Transport and Movement

- 3.42 Gloucester as an urban area has a comprehensive transport network that includes major roads, railway, bus/coach services, cycling routes and pedestrian routes. Key transport links through Gloucester include; the M5 motorway linking Birmingham and Bristol; the A417 linking the M5 with the M4; A40 providing east west access; Gloucester railway station linking London, Bristol, Birmingham, Cardiff and Swindon; and a good bus network coverage with a strong commercial network. There is an airport located at Staverton⁵⁴ (outside of the GCP area) which provides a limited range of internal flights, as well as flying lessons and flying activities including hot air balloon flights and wing walking.
- 3.43 Despite the travel choices offered however, car usage continues to dominate. Congestion occurs on many of the roads but particularly around Gloucester and Cheltenham⁵⁵. Traffic is a key source of emissions in the area, which indirectly affects air quality. ONS data⁵⁶ identifies that in line with regional and national trends the majority of households in Gloucester contain one car or van. The percentage of households with access to 2 cars/vans in Gloucester (roughly 26.9%) is higher than the national average (around 24.7%) but lower than the South West average of 28.3%. The percentage of

⁵⁴ Gloucestershire Airport

⁵⁵ Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

⁵⁶ ONS, 2011: neighbourhood.statistics.gov.uk; Gloucester (Local Authority)

households with access to 4 more cars/vans in Gloucester is lower than both the national and regional average at 1.7%, compared to 1.9% and 2.6% respectively. The percentage of households with access to no car or van is lower than the national average (22.6% compared to 25.8%), however it is higher than the South West average of 18.9%.

- 3.44 Transport in Gloucester is planned for at the County level, and the extant Gloucestershire Local Transport Plan⁵⁷ identifies current issues and objectives for the Plan area. The main issues facing the County area over the plan period 2011-2026 are:
- Limited funding availability from Government
 - Potential change in planning and transport policy structures
 - An ageing population
 - Preventative health – obesity, heart disease, partly due to inactivity
 - The scale, rate and location of new development
 - Rising oil prices and availability of alternative fuels
 - How much partners in the health services, education and others will be able to contribute in the future
 - How communities will respond to the aspirations in the Localism Bill/Act for them to deliver services in their own areas
- 3.45 The update to the Transport Plan identifies that within the wider Central Severn Vale (CSV) area approximately half of the county's population live, and the area has a higher proportion of the working age population when compared to the county average. This is reflected by the high proportion of travel to work journeys that begin and end within the CSV area, which further highlights the potential for increasing walking and cycling across the area.
- 3.46 Gloucester City has and will continue to benefit from a number of regeneration projects, with transport infrastructure continuing to be key in the successful delivery of schemes. The planned growth the GCT JCS and GCP will inevitably result in more trips within the area, and the Local Transport Plan identifies Gloucester as a strong 'trip attractor', particularly into its major employment centres. The Strategic Economic Plan⁵⁸ (SEP) promotes the creation of a growth zone for quality employment land in proximity to the M5 which includes Blackfriars in Gloucester.
- 3.47 There is a network of cycle routes connecting the urban area of Gloucester internally, and providing wider direct access to Bristol, Cheltenham, Tewkesbury, Worcester and Evesham, and further indirect access to Stroud, Cirencester, Swindon and Oxford. This includes National Cycle Routes 41 and 45. The Sustrans map⁵⁹ however identifies a lack of connections across the Cotswolds AONB, and the Draft Local Transport Plan⁶⁰ also identifies that there is a lack of cycle routes between Cheltenham and Gloucester (existing connections are from the north of the city).

⁵⁷ Gloucestershire County Council, Gloucestershire's Local Transport Plan 2011-26

⁵⁸ GFirst LEP (2014) Strategic Economic Plan for Gloucestershire

⁵⁹ Sustrans.org.uk; National Cycling Network

⁶⁰ Gloucestershire County Council, Draft Local Transport Plan 2015 – 31 Consultation Document 1

- 3.48 Without the City Plan development may be less likely to deliver the necessary highways capacity improvements to accommodate the cumulative impact of new development. The GCP can plan for local development in areas where the existing transport networks can accommodate growth, or where the necessary improvements can be more easily provided, and in locations which improve accessibility for local communities. The GCP provides an opportunity to coordinate the delivery of new housing, employment and infrastructure which will be more effective in helping to combat out-commuting, improve accessibility and reduce the need to travel.

Air Quality

- 3.49 Evidence⁶¹ indicates that Gloucester, as situated on the eastern bank of the tidal River Severn and backed by the Cotswold escarpment, has prevailing winds from the southwest which follow a passage up the river, channelled by the hills in the distance to either side. Gloucester is also home to the Hempsted Landfill Site in the north west corner of the city which has an A1 environmental permit issued by the Environment Agency. 41 activities hold an environmental permit with the Council. However, the main source of air pollution in the City that gives rise to concern for compliance is road traffic emissions from major roads, notably the A417, A430 and A38 which connect Gloucester with the main highway network in Gloucestershire, as well as local traffic in the centre of Gloucester.
- 3.50 There are three Air Quality Management Areas (AQMAs) in Gloucester, located at; Painswick Road (declared 2007), Barton Street and Priory Road (both declared 2005). All three of these AQMAs were designated for exceedances in emissions of nitrogen dioxide as a result of traffic on these roads. The 2011 Air Quality Action Plan identifies that air quality in Gloucester away from heavy traffic remains good. The 2018 monitoring review⁶² reported that exceedances of the annual mean NO₂ objective of 40µg/m³ were found at four locations during 2018, and all four locations were within the existing AQMAs.
- 3.51 Without the Plan there is likely to be a less coordinated approach to the delivery of new housing, employment and infrastructure in Gloucester. This could exacerbate congestion issues on the highway network and potentially affect air quality including the existing AQMAs. The plan provides an opportunity to consider the cumulative effect of new development on the existing road network and determine what additional infrastructure and wider mitigation is necessary to minimise impacts. New housing, employment and infrastructure can be delivered alongside improvements to public transport in areas that will help to reduce the need to travel and potentially help to address an existing area of congestion, such as within one of the existing AQMAs.

Energy and Climate Change

⁶¹ Bureau Veritas (2014) Gloucester City Council LAQM Progress Report 2014

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

- 3.52 The energy consumption figures for Gloucester in 2013⁶³ were as follows:
- Coal – a total of 6 GWh (gigawatt hours) wholly through domestic use
 - Manufactured fuels – a total of 6.2 GWh predominantly through domestic use
 - Petroleum products – a total of 504.9 GWh predominantly through road transport
 - Gas – a total of 861.9 GWh predominantly through domestic use
 - Electricity – a total of 606.2 GWh predominantly through industrial and commercial.

Consumption levels for all fuels, except for coal, have been steadily decreasing since 2005. The consumption of coal has been more variable over the years, with no distinguishable trend.

- 3.53 The emissions figures (by sector) for Gloucester in 2013⁶⁴ were as follows:
- 281.6 kt CO² from Industry and Commercial
 - 229.2 kt CO² from Domestic
 - 117.0 kt CO² from Transport

Emissions from all sectors have been steadily decreasing since 2005, and as identified above, Industry and Commercial remains the highest contributor to emissions of CO² in Gloucester.

- 3.54 The Climate Change Strategy⁶⁵ targets actions in the topic areas of buildings, transport, waste, water resources, renewable energy, biodiversity and adaptation. Each topic sets a suite of actions to address climate change issues, these include (but are not limited to):
- Gloucestershire Energy Efficiency Advice Centre
 - Affordable Warmth Strategy
 - Energy Management Strategy for council owned buildings
 - Solar hot water for housing
 - Improvements to cycle paths
 - The adoption of travel plans for schools and businesses
 - Farmers market
 - New bus station
 - Reduced residual waste collections to increase the incentive to recycle
 - Encouraging the use of water butts
 - Gloucestershire Renewable Energy Action Plan
 - Investigating potential for hydro power at Llanthony weir
 - Severnside Countryside Management Project
 - Climate sensitive planting schemes
 - Increased use of surface water management plans
 - Re-use of buildings

⁶³ DECC (2013) Sub-national total final energy consumption statistics: 2005-2013

⁶⁴ DECC (2015) 2005 to 2013 UK local and regional CO₂ emissions full dataset

⁶⁵ Gloucester City Council, Gloucester City Climate Change Strategy 2010

- 3.55 Building Regulations ensure that new development contributes to reducing carbon emissions. The GCP can provide further support in the long-term approach to climate change mitigation and adaptation, particularly through the appropriate siting of new development and the delivery of mitigation measures like new green infrastructure, sustainable drainage systems in new development, and contributions to improved flood defence. Without the Plan, development is less likely to adopt a long-term approach to the effects of climate change, and benefits arising from planning gains are less likely to be maximised.

Water: Resources, Quality and Flooding

- 3.56 Water resources in the area are managed by Severn Trent Water. The Water Resources Management Plan (WRMP) identifies that over recent years, leakage rates have been reduced to its lowest ever level and water efficiency targets have been exceeded. As a result there is sufficient water resources to meet needs. There are a number of challenges that the area will still face over the next 25 years however, which includes:
- Replacing approximately 85 million litres per day of licensed water abstraction that is no longer environmentally sustainable
 - Meeting the demand for water from the additional 1.6 million people expected to be living in the region
 - Coping with potential lower river flows during dry periods as a result of climate change
 - Ensuring that investment is made at an appropriate rate to address asset deterioration as the network ages.
- 3.57 The WRMP seeks to reduce the overall demand for water and to make the best use of existing resources through a more flexible and sustainable supply system. Actions to achieve this include:
- Reduce waste by driving leakage down
 - Reduce the demand for water, by working in partnership with customers to help them become more water efficient
 - Improving the ability to deploy existing resources flexibly and efficiently
 - Use water trading to make more efficient use of our resources and improve resilience
 - Develop new sources of water when required, with a focus on expanding existing sources first
 - Use proactive catchment management measures to protect our sustainable sources of drinking water supply from pollution risks
- 3.58 Gloucester lies within the Severn Vale catchment, part of the wider Severn River Basin District. Within the Severn Vale Catchment there are two operational catchments: Gloucester Tributaries and Severn River and Tributaries. Within the Gloucester Tributaries operational catchment there are 5 water bodies all of which are of moderate ecological status and good chemical status. One of these water bodies is expected to improve to good ecological status by 2027. The main reason identified for not achieving good status is 'urban and transport'.

- 3.59 Within the Severn River and Tributaries operational catchment there are 7 water bodies. 6 of these are of moderate ecological status and 1 is of good ecological status. All 7 water bodies are classified as good chemical status. Of the six water bodies classified as of moderate status, 3 are expected to improve to good ecological status by 2027. The main reasons identified for not achieving good status are 'agriculture and rural land management' and 'the water industry'.
- 3.60 The Severn River Basin RBMP reports that the majority of surface waters are classified as of moderate ecological status, and good chemical status. The majority of groundwaters are classified as of good quantitative status and good chemical status. There are also 45 surface water and 18 groundwater Drinking Water Protected Areas that are 'at risk'. There is a Surface Water Safeguard Zone located in the north of Gloucester in which the use of the pesticide metaldehyde must be carefully managed to prevent pollution of raw water resources that are used to provide drinking water.
- 3.61 Flood risk is high in many parts of Gloucester, particularly around the north, west and south west of the Plan area. Gloucester City is drained entirely by the River Severn, which has both tidal and fluvial influences in the area. Flood Zone maps⁶⁶ for the River Severn extend for large distances into the Plan area. The flood risk to Gloucester is predominantly fluvial as the River Severn channel becomes narrower, providing a restriction to high tides moving upstream and river flows moving downstream. The main areas at risk are on the Sud Brook around the Tredworth and Linden areas and on the Whaddon Brook around the Podsmead area. Evidence⁶⁷ indicates that the raising of defences at certain sites around Gloucester, in particular around Westgate, will deliver the most benefit.
- 3.62 In general the level of flood risk from artificial drainage systems within the Plan area is medium to high. Surface water flooding in Gloucester tends to be associated with poor urban drainage and backing up within urban drainage systems under high river flows. The abundance of impermeable surface can also contribute to surface water flood risk, especially when local intense rainstorms occur. The Gloucester and Sharpness Canal is located within Gloucester City. There are no recorded incidents of breaches or overtopping, or any other local flood risk instances associated with this canal. There are no records of breaching/overtopping of reservoirs within Gloucester, and no records of groundwater flooding.
- 3.63 The Level 1 SFRA⁶⁸ reports that in the light of climate change, given the lowland setting of Gloucester, an increase in flood extent is expected, but flood waters might also be deeper. This means that the flood hazard is likely to increase over time, creating increased risk to humans, more damage to properties and higher economic damages. Sites currently within Flood Zones 2 and 3 are likely to be subject to more frequent and potentially deeper flooding. Additionally, the tidal section of the Severn might be subject to

⁶⁶ Environmental Agency; Flood Map for Planning (from Rivers and the Sea)

⁶⁷ Gloucester City Council (2016) Topic Paper: Flooding

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

increased storm surges and wave height. The scope of the SFRA Level 2⁶⁹ was determined in 2017.

- 3.64 The most significant changes in the flood depth and extent can be seen in the catchments of the Sud Brook and River Twyver, including the industrial area around the Gloucester Docks, through St Paul's, High Orchard, Barton and Tredworth, and south of Coney Hill. There are a few considerable changes in the Wotton Brook catchment, where properties west of the A38 Tewkesbury Road and those on the border between Elmbridge and Wotton are expected to flood in the future. There is also an area of agricultural land downstream of the A40 at risk. Slight increases in depth and extent of flooding in areas already at risk of flooding from the Daniel and Dimore Brooks are predicted, but not on the same scale as other areas of the Gloucester Streams.
- 3.63 Damages during the one per cent annual probability flood event, increase by 17% to £110 million under the 100-year horizon future scenarios⁷⁰. The scale of damage therefore remains high. The SFRA⁷¹ recommends that the local authority consider using the climate change maps to carry out the Sequential Test, in order to give a particularly long-term risk-based approach to planning.
- 3.64 Development will still come forward without the Plan and will need to be in line with current national and local policies and guidance in relation to the protection of water resources and quality; incorporation of efficiency measures; management of surface water run-off and avoidance of flood risk areas. However, the GCP gives the Council the opportunity to more effectively coordinate development and direct it towards those areas that are potentially less sensitive and have lower risk of flooding. It also provides an opportunity for the Council to set more aspirational requirements for future development in terms of water efficiency standards and the management of surface water run-off and adopt a longer-term risk-based approach to planning in line with recommendations emerging from the Gloucestershire SFRA.

Soil and Land

- 3.65 The Housing Monitoring Report⁷² identifies that in the period between 1 April 2014 and 31 March 2015 the gross completion figure for new dwellings in Gloucester was 568. Of these completions the majority (388) were located on previously developed (brownfield) land.
- 3.66 Defra⁷³ identifies bands of agricultural land on the outskirts of Gloucester City particularly; to the north around Longford; in the east and south-east around Brockworth; and to the south around Quedgeley and Hardwicke.

⁶⁹ https://www.gloucester.gov.uk/media/1844/strategic_flood_risk_assessment_level_2_gloucester_city_plan_sites.pdf

⁷⁰ Ibid.

⁷¹ Ibid.

⁷² Gloucester City Council (2015) Housing Monitoring Report

⁷³ DEFRA Magic Map Application [online]

- 3.67 Like many other urban areas in the UK, Gloucester has had a long industrial history, which along with more recent activities, can cause contamination of the ground. In 2009⁷⁴ it was identified that nearly 400 site contamination investigation and remediation reports were on file with Gloucester City Council. The contaminated land register⁷⁵ identifies that all properties determined on the register as contaminated land (properties at Westend Parade, Alney Terrace, Fair View Caravan Site, and Pool Meadow Caravan Site) have been appropriately remediated.
- 3.68 New development has the potential to result in the loss of best quality soils, and to affect the quality of base and surrounding soils as a result of disturbance or contamination. The GCP can act as a delivery mechanism for the protection of soil quality and appropriate direction of new growth, for example by directing development towards previously developed land where possible, or the appropriate minimisation of risks, for example requiring remediation of contaminated sites where necessary. Without the Plan, there is likely to be a less coordinated approach to the delivery of development. For example, development may not be directed to those areas of lower agricultural land quality.

Biodiversity and Geodiversity

- 3.69 There are no European designated sites for nature conservation within the Plan area. The closest European sites is the Cotswold Beechwoods Special Area of Conservation (SAC) located roughly 2.5km to the south east of the Plan area.
- 3.70 There are two Sites of Special Scientific Interest (SSSIs); Hucclecote Meadows SSSI is a 5.75ha site located in the east of the City, and Robin's Wood Hill Quarry SSSI is a 1.93ha site located in the south of the City. Both are in favourable condition⁷⁶. Hucclecote Meadows is a series of lowland meadows overlying Lower Lias clays in the Severn Vale on the outskirts of Gloucester. The meadows contain the Priority Habitat of Lowland Neutral Grassland (MG4 and MG5) and represent one of the few remaining areas of such herb-rich ancient pastures in the county, traditionally managed for hay and stock grazing⁷⁷. The Robin's Wood Hill Quarry SSSI forms part of the Robinswood Hill Country Park and provides the best inland section of Lower Jurassic, Middle Lias strata in Britain, with a complete section of the Upper Pliensbachian Stage present. The geology of the site has been intensively studied, particularly the diverse faunas which it yields⁷⁸.
- 3.71 The County area contains a number of locally designated biodiversity and geodiversity sites including; 9 Local Nature Reserves (LNRs), 6 Key Wildlife Sites (KWSs) and 28 other sites of Nature Conservation Interest. The Open Space Strategy⁷⁹ identifies that six of the designated Local Nature Reserves are

⁷⁴ Gloucester City Council (2009) Contaminated Land - An Inspection Strategy for Gloucester

⁷⁵ Gloucester City Council (2016) Public Register of Contaminated Land

⁷⁶ DEFRA Magic Map Application [online].

⁷⁷ Natural England Designated Sites View [online].

⁷⁸ Ibid.

⁷⁹ Gloucester City Council Open Space Strategy 2014 - 2019

located within Gloucester city. The Gloucestershire Nature Map⁸⁰ identifies the strategic connectivity of nature areas at the county level, which are connected through the following habitats:

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

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

- 3.72 Development will still come forward without the Plan and will need to be in line with current national and local policies and guidance in relation to the protection of biodiversity and geodiversity. However, the GCP gives the Council the opportunity to more effectively coordinate development and direct it towards those areas that are potentially less sensitive. It also provides an opportunity to consider and address potential strategic cumulative effects on biodiversity that may not be taken into account at a lower level of plan-making. Development could be directed away from important ecological corridors or perhaps help to improve habitat connectivity, not only within Gloucester but into the surrounding areas.

Landscape and Townscape

- 3.73 Gloucester is an urban landscape within the Severn and Avon Vales National Character Area, containing 5 different Landscape Character Types; Settled Unwooded Vale, Floodplain Farmland, Vale Hillocks, Escarpment Outliers, and Unwooded Vale.
- 3.74 Townscape improvements in Gloucester include⁸¹:
- Significant public realm improvements between Gloucester Quays and Kimbrose Triangle / Southgate Street
 - Kings Quarter Regeneration Area, including the development of a new bus station (and demolition of the old bus station) and improved linkages between bus / rail interchange and the main commercial area, as well as a range of new uses including retail, residential, restaurants and cafes.
 - Southgate Street care home scheme, which includes significant public realm improvements to the wider area.
 - Pedestrianised areas at St John's Lane, Worcester Street and St Lucy's Garden
 - Refurbishment of Gloucester Park

⁸⁰ www.gloucestershirenature.org.uk

⁸¹ Gloucester City Council Promoted Capital Works and Gloucester City Council Officer advice

- Improvements to the pedestrian route from St Oswald's Park (Cattle Market) to the City centre (incorporating the redesign of Priory Gardens and part of St Mary de Lode churchyard).
- A new park at Brionne Way in Longlevens
- Improvements to St James Park
- Refurbishment of the open space to the front of At Aldates Church

3.75 The GCP offers a delivery mechanism for extended protection of key townscape characteristics that contribute to sense of place. The Plan can also coordinate opportunity and investment across the whole of the plan area to ensure that development delivers the best possible, high quality, and multifunctional benefits. Therefore, without the Plan future development has an increased likelihood of resulting in negative effects on townscape character, and a decreased likelihood of delivering coordinated and prioritised improvements.

The Historic Environment

3.76 There are over 700 Listed Buildings and 26 Scheduled Monuments in Gloucester, a significant number of which are located within the City centre. Westgate Street has the greatest concentration, with 79 Listed Buildings, 14 of which are Grade I or Grade II* Listed. The most recent survey into the condition of these assets in 2013 identified 26 buildings as 'at risk' and a further 17 as vulnerable of becoming so⁸². There are also 14 Conservation Areas, as listed below:

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

3.77 All trees in a Conservation Area with a trunk diameter of more than 7.5cm, when measured 1.5m from the ground, are protected. There are also two Article 4 directions in force at St Michael's Square and Southgate Street Conservation Areas restricting development that could affect the external appearance of properties in these areas. A Historic Area Grant exists within the Primary Shopping Area and is used to help owners of properties in a heritage setting to put their buildings into sound repair.

⁸² Gloucester City Council (2013) Buildings at Risk

- 3.78 Southgate Street has been subject to the Townscape Heritage Initiative (THI), a £1.2 million project to improve this gateway to the City, funded by the Heritage Lottery Fund for five years until 2018. The THI covers an area from St Mary DeCrypt Church, to the southern end of Southgate Street where it meets St Anne's Way. The project offers grant assistance to property owners in the Southgate Street area in order to; reinstate lost architectural detailing; return vacant floor space into beneficial use; enable repairs to the external structure of buildings; and improve the quality and design of the street scene within the City centre.
- 3.79 The City has a rich archaeological heritage, containing remains of national and international importance. As well as Roman and Medieval remains, archaeologists have found evidence of earlier settlement. Remains from the Neolithic period have been recovered from the City centre and Iron Age settlement has been identified in the Kingsholm area and elsewhere.
- 3.80 Evidence⁸³ suggests that the heritage of the city is a central component in the identity of the city. It defines much of what is locally distinctive about the city and that impacts on how the city's residents and visitors feel, use and perceive the city. It is central to Gloucester's civic pride, status, sense of place and the sense of continuity in times of change.
- 3.81 Without the plan, designated heritage assets would still be protected through National and Local policy. The GCP and SA can consider the cumulative effects of proposed development on designated and non-designated heritage assets and their settings. The Plan can thus provide a delivery mechanism for enhanced protection for undesignated assets, settings and features that contribute to the local historic environment. It can also secure enhancements for the historic environment, for example in promoting new development that brings derelict buildings back into use, through appropriate investment and contributions and in interpretation and access to the historic environment. With such an abundance of heritage assets in the plan area, the GCP can carefully plan for responsively designed development in the most appropriate locations.

Minerals and Waste

- 3.82 The Gloucestershire Minerals Local Plan⁸⁴ reports that there are drift deposit resources which may contain sand and gravel deposits within Gloucester, however there are no mineral workings in Gloucester. The Plan does however safeguard existing sites for processing minerals in Gloucester, including Nettlebridge Wharfage, Chelmix, Hope, Cemex and Allstones.
- 3.83 Waste management is also coordinated at the County level⁸⁵. The four main types of waste produced in Gloucestershire are; Municipal Solid Waste (MSW), Commercial and Industrial, Construction and Demolition, and Hazardous

⁸³ Gloucester City Council (2016) Topic Paper: Historic Environment

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

⁸⁵ Gloucestershire County Council (2012) Waste Core Strategy

waste. MSW is the waste collected by or on behalf of local authorities, and around 90% of this comes from households. In 2009/10 this equated to 294,000 tonnes, which demonstrates a general increase since 2001, however there has been a decline since 2006/7 in which levels peaked at 324,143 tonnes. The largest waste stream in the County is Commercial and Industrial in which 375,000 tonnes were recorded for 2008. The amount of Commercial and Industrial waste managed in Gloucestershire has been more variable over time, with no obvious trend over the last 10 years.

- 3.84 Within Gloucestershire there is one co-mingled Materials Recovery Facility (MRF) at Moreton Valence. Planning permission has also been granted for a similar facility at Wingmoor Farm East however this is not yet operational. There are very few facilities for recyclates in Gloucestershire and as such the majority of recyclates once they have been sorted and bulked are transported out of the county. There is a Household Recycling Centre within Gloucester at Hempsted, as well as local recycling bring banks at Sainsbury's Quays, Sainsbury's Barnwood, ASDA Metz Way and Morrisons Abbeydale, and a Community Recycling Area at Scott Avenue.
- 3.85 The strategic directions for the ongoing management and future development of waste and minerals facilities and operations are planned for in the Gloucestershire Minerals and Waste Local Plans, and as such already have a guiding framework in place. Although the GCP will have less bearing on this aspect, it will be planning for the future growth of housing and communities. Minerals and waste can affect human health through noise pollution and odour, and as such the GCP provides the opportunity to plan for development that minimises these effects. The GCP can also ensure that new housing and employment development considers the implications of its waste production and management, to plan for sustainable waste management and support the aims of the Waste and Minerals Local Plans.

Key Sustainability Issues, Problems and Opportunities

- 3.86 Key sustainability issues were presented in the Sustainability Appraisal Statement (February 2012), and had been identified from Scoping Reports and SA work for the GCT JCS and the early work on the City Plan. Following the updated review of plans and programmes and baseline information, these key sustainability issues were reviewed and updated with minor amendments made. The updated key sustainability issues are set out in Table 3.1 below, and an overview of the progression of these issues is provided in Appendix II.

Table 3.1: Key Sustainability Issues and Opportunities

Key Sustainability Issues and Opportunities
Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.
A large proportion of the City falls within the River Severn floodplain.
Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings.
Certain areas of the City suffer from traffic congestion and poor air quality.

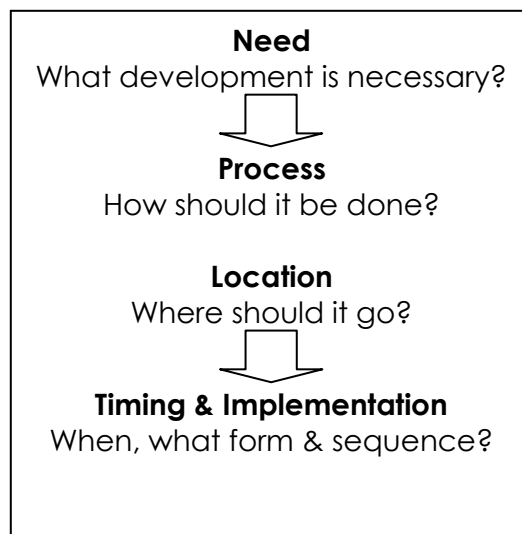
There is a need to encourage a move away from the dependence on the private car.
There is a need to ensure carbon emissions are minimised.
Previously developed land may be subject to contamination.
The City needs to protect areas of public open space and green corridors/networks, and ensure open spaces are accessible to all.
There are areas of the City that experience high unemployment rates.
There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry.
High levels of in-commuting.
Limited early hours / evening economy.
Need to plan for and protect quality employment land and ensure a future supply.
There are older, less attractive employment areas.
Lack of overnight tourist visitors.
Poor retail provision compared to the size of Gloucester's shopper population.
There are opportunities to connect new employment development with key transport infrastructure projects (e.g. the M5 and Blackfriars to support the growth zone identified in the Strategic Economic Plan, and alongside the new bus station.
There is acute housing 'need' in the City.
'Pockets' of acute deprivation exist in some parts of the City.
There is a significant growth in the population predicted, particularly in the young and working age bands.
Growth in the number of households, in particular single person households.
Educational achievement needs improving.
Homelessness
There are inequalities in opportunity across the Plan area.
High levels of obesity in both adults and children.
Adequate protection of cultural heritage.
Localism driving increased local level participation.
Crime and fear of crime.
There are areas of the City that experience high unemployment rates.
There is a national requirement to minimise waste production and the amount of waste sent to landfill.
There is a requirement to maintain and improve the ecological status of the River Basin.

4.0 ALTERNATIVES IN SUSTAINABILITY APPRAISAL & OPTIONS IN PLAN MAKING

Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive⁸⁶ requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance⁸⁷ that it means “realistic and deliverable” and within the timescale of the plan.
- 4.2 SEA guidance sets out an approach and methods for developing and assessment of alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making



- 4.3 Case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment⁸⁸ confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to,

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

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

⁸⁸ Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

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

- 4.4 The Broadlands Judgment⁸⁹ drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment⁹⁰ confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of a SA Addendum Report; this was subsequently upheld at Appeal.

Assessment of Options in Plan-Making

- 4.5 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the Councils through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.6 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus, the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.
- 4.7 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services and impacts on local landscape, and particularly informed by technical studies such as the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), and Strategic Flood Risk Assessment (SFRA). There is a hierarchy of options assessment with sites that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.

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

⁹⁰ Cogent Land LLP v Rochford District Council (2012) EWHC 2542

- 4.8 The role of the SA is to inform the Council in their selection and assessment of options; SA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the SA can help with refining and further developing these options in an iterative and ongoing way. The SA findings do not form the sole basis for decision making – this is informed also from planning and other studies, feasibility, and consultation feedback.

Options for Accommodating Growth in the Gloucester City Area

- 4.9 Different options for accommodating proposed growth in the Gloucester, Cheltenham and Tewkesbury local authority areas have been considered and variously subject to SA/SEA and consultation since early Joint Study Area studies in 2004-6, through iterations of the emerging Joint Core Strategy 2009-2013, Submission in 2014, and continuing during the Examination stages 2015-2016 with Main Modifications and adoption in December 2017. Consideration of options was discussed during the examination of the JCS and this included reflection on the proposed Strategic Site Allocations (Policy SA1) to meet Gloucester's identified need for development.
- 4.10 Doing nothing is not a reasonable alternative for the City Plan since a strategy with locally relevant Policies and local (non-strategic) site allocations are required to avoid negative effects and ensure a sustainable delivery of the required development in the Gloucester area and as identified in the JCS (Policies SP1 & 2).
- 4.11 **City Plan Parts 1&2 Initial SA Reports**⁹¹ (2012 & 2013): The initial SAs explained that there is limited possibility for investigating options through the Gloucester City Plan. The GCP Strategy and Development Principles are underpinned by a City Centre first approach that has developed over considerable time and study with the JCS, including testing through SA. Local development opportunity options were considered through public consultation in May – July 2013⁹² with the next stage of plan preparation and Sustainability Appraisal. The likely significant effects (positive and negative) of potential site options were assessed by Ward area and summary findings reported including mitigation possibilities for potential negative effects identified. At this time, an invitation was made for further potential options for local development sites for the GCP.
- 4.12 **Draft Gloucester City Plan (2017) & SA Report**⁹³: All reasonable options for new development identified through the calls for sites and site assessment process/Strategic Assessment of Land Availability (SALA) were progressed at this stage as proposed site allocations. It may be remembered that Gloucester City is not able to meet its identified housing and employment land need through available land within the City Council's area. Therefore, all site options that have been identified as reasonable (suitable and deliverable) have been progressed.

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

⁹² *ibid*

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

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

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

Vision and Development Principles

5.1 The Draft GCP included the following Vision:

"Between 2016 and 2031 the City Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.

During this time significant progress will have been made in the regeneration of the City Centre and elsewhere within the City. Gloucester will be a flourishing, healthy, modern and ambitious City, where people feel safe and happy in their community and are proud to live and work.

Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location. The City Council will work with partners and neighbouring authorities to ensure that the economic development required beyond its boundary benefits Gloucester, while at the same time, supporting business growth and expansion within the City itself.

A significant number of new decent homes will have been delivered in a way that reflects the type and tenure needed by the local community and that supports economic growth.

Health and wellbeing will be a key consideration in all planning decisions ensuring the protection and provision of active streets, open spaces, playing fields, community infrastructure, environmental quality, connectivity and access.

New development will be built to the highest possible standard of design and will be focused on protecting the quality and local distinctiveness of the City.

Gloucester's unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy."

5.2 This is supported by Development Principles identified to help deliver this vision. The Principles were as follows:

- | |
|---|
| 1. To ensure development contributes to the delivery of a transforming City which brings regeneration benefits, promotes sustainable development and makes the most efficient use of brownfield land and buildings |
| 2. To ensure that new development is supported by the necessary infrastructure |
| 3. To regenerate the City Centre and other areas of the City in accordance with the Council's adopted strategies and maximise benefits associated with Housing Zone status |

4. To develop a City Centre that provides for the needs of the 21 st Century, with increased choice, an improved environment and to protect it from inappropriate competition in other locations
5. To provide a balanced network of local and district centres that provide for the everyday shops, services and facilities needed by the local community.
6. To provide a balanced mix of new homes that provide for the needs and aspirations of the local community, working with neighbouring authorities where they are providing for housing needs of the Gloucester community.
7. To encourage and facilitate inward and home grown investment, attracting innovative growth sectors, create high and stable levels of economic growth and increases job opportunities.
8. To improve educational attainment, skills and learning opportunities.
9. To protect and enhance the City's leisure, recreation and environmental assets, including valuable heritage, public open space, allotments, areas of nature conservation, sensitive landscapes, playing fields and sporting facilities.
10. To encourage a vibrant and safe evening and night-time economy in the City Centre that appeals to all age groups and encourages more people to stay overnight.
11. To tackle poverty and deprivation in the worst affected areas of the City.
12. To deliver development that achieves high quality design that reduces crime and the fear of crime, builds positively on local distinctiveness and contributes to the creation of an active, connected and sustainable City.
13. To ensure that development minimises its impact on climate change through sustainable construction and design, encourages the use of sustainable forms of transport and integrates with and makes the most of existing infrastructure.
14. To improve health and wellbeing through good design that promotes opportunities for all residents to lead 'activity lives', by providing access to good quality open spaces, playing fields and community facilities, and protecting air quality and residents from pollution and contamination.

- 5.3 The Draft GCP Vision is compatible with nearly all the IA Objectives, particularly those relating directly to accessibility and reducing the need to travel, the built environment and regeneration, health and wellbeing. There is uncertainty in relation to minimisation of waste as the delivery of new housing is inevitably likely to increase the amount of waste generated within the City. It was recommended that the Vision could be enhanced by including wording that seeks to minimise waste generation and promotes the waste hierarchy.
- 5.4 The Principles were found to be compatible with at least one of all of the IA Objectives, and as such will contribute to sustainable development to a certain extent.
- 5.5 Given the complex inter-relationships between objectives, some uncertainties do exist. For example, the delivery of new housing has the potential to affect flood risk, landscape/townscape and noise and light pollution. Positive effects will be dependent on further objectives that seek to minimise potential negative effect and maximise positive effects. The delivery of new housing is also likely to increase waste generated within the City and as such is considered incompatible with this SA Objective. Some of the GCP Principles are very specific and therefore only relate to certain SA topics, as such these are likely to have a neutral effect on a number of other SA Objectives. It was again recommended that the Principles could be enhanced by including

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

Proposed Site Allocations

- 5.6 As Gloucester City Council is unable to meet its identified housing needs, most potential site options are required to help contribute to meeting the housing need and as such it is considered that there is a lack of alternatives in this respect. However, there were a number of site options that were included in the City Plan Consultation in May 2013 that have not been carried forward into the GCP Potential Site Allocations 2016. These sites, along with the reasons for rejection are summarised in the table below.

Table 5.1: Reasons for Rejection of Sites Included in City Plan Consultation May 2013.

Ref	City Plan Ref	Site Name	Reason for not carrying forward into 2016 potential
1	WN1	St Oswalds Road	Partly within Flood zone 3
2	WN5	Hampden Way Car Park	Existing car park, not available
3	WN7	Land at corner Southgate Street and Trier Way	Site developed as elderly care home
4	P1	Former Jet and Whittle	Site developed for residential
5	E1	Bohanam House	Site occupied by a tenant on a long lease with no view of vacating site. As such the site is no longer considered available.
6	B2	Royal Mail	Employment land that will be protected by Employment policies as such does not require allocation
7	B3	Fire Station	Land developed for retail use
8	A1	Land adjacent to Abbeydale District Centre	Not suitable for development. Part flood zone 3 and partly developed as car park for doctors surgery
9	WS13	Land at Rectory Lane	Consent for residential development for one unit. Site considered too small to allocate.
10	KW2	Hare Lane North Car Park	Site considered too small for development
11	KW3	Industrial Units Alvin Street	Site now occupied and therefore no longer available
12	H1	Hucclecote Resource Centre	Site developed for residential
13	MR1	Land at Winnycroft Farm	Site has become a JCS allocation
14	MR2	Land South of Winnycroft Farm	Site has become a JCS allocation
15	Part of WN6	Victoria Dock/Land at Llanthony Warehouse	Site too small. Not considered suitable for residential development.

SA of Draft Policies: Social, Economic and Environmental

Introduction

- 5.7 This section sets out the findings of the Sustainability Appraisal (SA) of the Draft Gloucester City Plan (GCP). It is structured according to 12 key topics which have been linked to relevant SA Objectives as well as SEA Directive topics. The appraisal of each topic has been divided into a number of sub-headings to ensure that each aspect of the emerging GCP is considered, including policies and site allocations, as well as the interrelationships between topics and cumulative effects of the Plan as a whole.
- 5.8 In accordance with the SEA Directive and Regulations any likely significant effects are identified along with any mitigation measures necessary to address significant negative effects.

Housing

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 18: Ensure the availability of housing land and premises including affordable housing to meet local needs.

Relevant GCP Topics Paper(s): Housing

Appraisal of Draft GCP Policies

- 5.9 The overall level of housing growth is strategically set by the GCT JCS which seeks to deliver 35,175 new homes during the plan period. Policy SP1 in the Submission JCS (November 2014) sets a housing requirement of 14,359 new homes to be delivered in Gloucester City between 2011 and 2031, with the distribution of development between the three authorities defined further in GCT JCS Policy SP2. Gloucester is unable to meet its full objectively assessed housing needs within the city boundary, and as such the JCS has determined strategic urban extensions on adjacent land which will support the future growth of Gloucester. The urban extensions include areas located to the north, east and south-east of Gloucester in Innsworth and Twigworth, South Churchdown and North Brockworth. The residual needs which will be met within the existing city boundary include a proportion of committed development, the development of a central housing zone, and distributed allocations to meet local area needs. The central housing zone targets the 4 key areas of; the Railway Station & King's Quarter, St Oswalds, the Heart of the City, and Gloucester Quays; which each contain priority sites and identified development sites.
- 5.10 Policies and allocations which deliver new housing have the potential for major long-term positive effects on housing. Whilst the overall level of growth is determined by the GCT JCS, the Draft GCP has the opportunity to distribute the targeted growth within the city boundary to address key local issues such

as deprivation, and to seek to achieve synergistic development gains and benefits by delivering housing development alongside key infrastructure and regeneration projects and investments. The identification of the housing zone areas will contribute to coordinated delivery of housing alongside key infrastructure projects (like the new bus station and train station improvements) which is likely to lead to significant positive effects through increased accessibility and high-quality public realm enhancements supporting ongoing investment and renewal.

- 5.11 Development within the City should also seek to address specialist housing needs and provide a mix of housing types and tenures, including homes for Gypsy and Traveller communities. The policy framework allows for the development of specialist housing including upper floor residential in the city centre, infill development, intensification, student housing, elderly accommodation and special needs housing, extensions and annexes, and self-build opportunities. Gypsy and Traveller needs were assessed in the GCT JCS which has identified a need to deliver 2 new pitches within the city boundary. GCT JCS Policy SD14 sets the criteria that development must meet in the delivery of Gypsy and Traveller accommodation, and Policy X seeks to retain existing static caravan sites. It is considered that the policy framework in the GCP could be strengthened by identifying the most suitable and sustainable location for the development of extra pitches to meet the needs of the Gypsy and Traveller population. It is noted however, that the forthcoming consultation on the Draft GCP (and this accompanying SA Report) will include a call for sites, which seeks to identify new opportunities for the development of Gypsy and Traveller accommodation.
- 5.12 Affordable housing delivery targets are set in the GCT JCS, and the Draft GCP does not include any further policies relating to affordable housing.

Appraisal of Proposed Site Allocations

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

Synergistic and Cumulative Effects

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

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

Interrelationships with other Topics

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

Economy and Employment

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

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

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

Appraisal of Draft GCP Policies

- 5.16 Policy SP1 in the GCT JCS plans for the delivery of new employment land to support around 39,500 new jobs. Policy SD2 supports economic development within the identified strategic allocations in the GCT JCS, as well as within Gloucester, Cheltenham and Tewkesbury town. GCT JCS Policy SD3 further requires Local Plans to provide for the delivery of new retail floor space in existing designated centres; for Gloucester this equates to 42,000m² of new comparison goods retail space to be delivered over the plan period to 2031.
- 5.17 The delivery of new employment land has the potential for major long-term positive effects on the economy by helping to meet the employment needs of the Plan area. The GCP seeks to concentrate the majority of new employment and retail development within the central area, which can support the vitality and viability of the city centre, with the potential for long term positive effects. A focus on mixed-use and commercial development in the central Housing Zone will support targeted regeneration in this area, and

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

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

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

Appraisal of Proposed Site Allocations

- 5.22 The employment site allocations have the potential for long term positive effects on the economy through the provision of new employment land. Allocations of over 1ha are considered to have positive effects of greater significance given the larger scale of development. Sites allocated within the central regeneration areas are also considered to have positive effects of greater significance given that development would be well connected to the central area infrastructure, services and facilities and easily accessible by

existing public transport routes, which will support access to employment opportunities for local residents.

Synergistic and Cumulative Effects

- 5.23 Overall the policies contained within the Draft GCP seek to deliver the identified employment growth needs (including retail growth), protect and enhance existing employment areas, and restrict the loss of existing employment areas with the potential for minor to major long term positive cumulative effects.

Interrelationships with other Topics

- 5.24 The provision of new employment land has the potential for indirect positive effects on health and equalities, and transport and accessibility. However, there is also the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change and flooding, water resources, water quality, flooding, natural environment, cultural heritage and waste and recycling. The potential indirect effects are mitigated by other GCP policies which have been identified in the relevant topic sections.
- 5.25 A significant aspect of the GCP is the planned and targeted continued regeneration of the central area and historic core of the city. It is considered that the Draft GCP could include policy interventions or an overarching development brief to secure / maximise the potential benefits arising from the delivery of new growth in this zone. A comprehensive high level development brief could better promote the employment opportunities and seek coordinated development gains that maximise the potential for synergistic positive effects spanning across various topics. For example: public realm and townscape improvements, improved permeability, access and signage, interconnected green/open spaces and recreational opportunities, the delivery of public art and cultural enhancements and improved community engagement and historic environment appreciation.

Recommendation: A high level comprehensive development brief for the targeted housing / regeneration zone that maximises the potential for coordinated development gains.

Health and Equality

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

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

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

Appraisal of Draft GCP Policies

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

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

- 5.29 Development can also support healthy and active communities through the delivery of networks of open and green space, and attractive and safe streets and pedestrian walkways / cycle paths which connect to local services and facilities. Coordinated development can deliver direct health benefits (e.g. increased levels of walking / cycling) and support a modal shift that can contribute to long term climate change mitigation and indirectly support health and wellbeing through healthy functioning ecosystems. Given the urban and built up nature of Gloucester, the GCP has significant opportunities to deliver health benefits in this respect. The policies contained within the Draft GCP seek to retain, enhance and improve access to open space; however, it is considered that the policy framework could be strengthened by seeking to improve the connectivity between these areas to promote a network of connected recreational spaces. It is considered that this is more likely to promote synergistic effects (for example connected spaces along waterways creating attractive routes for jogging and recreational cycling) in line with the Gloucester Open Space Strategy⁹⁴. Policies D1 and D3 support active design and strategic connectivity to promote walking and cycling. Policy D4 further requires allotment provisions which can contribute to healthy lifestyles. These policies are considered likely to lead to long term positive effects on health and wellbeing.

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

Appraisal of Proposed Site Allocations

- 5.30 Site allocations 20, 25, 30, 33, 39 and 44 were assessed as having the potential for minor to major negative effects on health and wellbeing, as they are not located within reasonable walking distance to health facilities and/or promoted walking routes. All of the site allocations, apart from site option 1, are located within 800m of green/open space with the potential for a minor long-term positive effect on health and wellbeing. As the appraisal has identified however that the majority of the sites are well connected with existing spaces, it is considered that policy wording could be enhanced by a requirement for qualitative enhancements to existing spaces, when quantitative provisions are unnecessary. Development at site option 30 could also result in the loss of existing health facilities with the potential for a major negative effect. Site allocations 1, 2, 3, 4, 7, 12, 17, 20, 22, 28, 29, 37 and 44 are located adjacent to a railway line or A-road with the potential for minor negative effects on the amenity of future residents, however it is considered that suitable mitigation is provided through the GCT JCS and Draft GCP to ensure that there will be no significant negative effects with the potential for a residual neutral effect. Mitigation includes Policy D11 on Noise, Policy D12 on Pollution and Policy D14 on the Cordon Sanitaire area. The proposed site

⁹⁴ Gloucester City Council (2014) Open Space Strategy 2014 - 2019

allocations that are closer to existing facilities/services and sustainable transport modes are more likely to have positive effects on health and equalities. A number of the proposed site allocations are located within areas with the highest deprivation levels in respect to barriers to housing. This targeted growth can support a reduction in inequalities in the Plan area, and support ongoing investment and renewal in these areas, with the potential for major long-term positive effects.

Recommendation: The SA recommends that the draft Policy includes wording that further seeks qualitative enhancements to existing open/green spaces.

Synergistic and Cumulative Effects

- 5.31 The Draft GCP supports the delivery of new housing and employment growth set out in the GCT JCS to meet the needs of all residents. The GCP also supports development that will improve community facilities and local services and improve access to outdoor sports and recreational opportunities. Cumulatively the GCP can contribute to reducing inequalities and enhancing opportunities within the Plan area, by strategically targeting this growth, with the potential for major long-term positive effects. As identified in the policy appraisal above, there is also the potential for synergistic effects through the promotion of connected recreational spaces, and it is recommended that the GCP seeks to adopt this approach.

Interrelationships with other Topics

- 5.32 Health and equalities can be indirectly affected by the nature and significance of effects on the majority of other topics. Positive effects on housing, employment and transport and accessibility can lead to indirect positive effects on health, equalities and communities. Air quality, water resources, water quality, flooding, biodiversity and natural resources, waste, and cultural heritage can also either positively or negatively indirectly affect health. Policy mitigation to reduce negative effects on these topics (and thus reduce the indirect effects on health) are discussed under the relevant topic heading.

Transport and Accessibility

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 6: Reduce the need to travel and maximise the use of sustainable modes of transport.

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

Appraisal of Draft GCP Policies

- 5.33 The delivery of the growth proposed through the GCT JCS has the potential to increase the number of road users and thus traffic, with the potential for

negative effects on this topic. The nature and significance of the effects on traffic is ultimately dependent on the location and scale of site allocations. The potential sustainability effects of the proposed site allocations on this topic are discussed in more detail below.

- 5.34 Gloucester City is predominantly an urban area with a well-established highways and movement network which includes cycle paths, bus services, a bus station and a train station. In this respect there are opportunities to deliver new housing and employment development in locations with good access to sustainable transport modes. This will encourage a modal shift with the potential for long term positive effects. Similarly, the location of new development in close proximity to services, facilities and employment options will reduce the need to travel with the potential for long term positive effects.
- 5.35 GCT JCS Policy INF1 requires development to provide safe access to the transport network, and to enable travel choice, which includes access to walking, cycling and passenger transport networks. GCT JCS Policy INF2 also requires development to assess the impacts of proposals on the transport network to include congestion, safety, noise and atmospheric pollution impacts. This policy mitigation should ensure that development does not lead to any significant negative effects, and the promotion of travel choice has the potential for minor long-term positive effects by encouraging a modal shift.
- 5.36 The Draft GCP enhances the mitigation available for potential negative effects, requiring active design in Policy D1 which encourages walking and cycling, and Policy D3 which requires development to meet the highest standards of accessible and inclusive design. Policy H1 also seeks close working with the County Council and other organisations to deliver transport infrastructure improvements. It is considered that sufficient mitigation is provided through the GCT JCS and Draft GCP policies to ensure that there will be no significant negative effects on this topic. The promotion of active design and increased accessibility is considered to have the potential for minor long-term positive effects against this topic.

Appraisal of Proposed Site Allocations

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

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

Synergistic and Cumulative Effects

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

Interrelationships with other Topics

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

Air Quality

SEA Directive Topics: Air

Relevant SA Objectives:

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

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

Appraisal of Draft GCP Policies

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

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

- 5.41 The GCT JCS provides mitigation to reduce potential negative effects on air quality. GCT JCS Policy SD4 requires development proposals to demonstrate that they are avoiding unnecessary pollution of air, while Policy SD15 seeks to protect and improve environmental quality, reiterating the requirements of Policy SD4 but also considering cumulative effects. This is supported by the transport and accessibility policies as outlined in the transport and accessibility policy appraisal above (e.g. Policy INF1 in the GCT JCS and Policy D3 in the Draft GCP). The potential negative effects are also mitigated by Policy PD4 in the Local Transport Plan 3⁹⁵ (LTP3) which seeks to work with the District Councils to improve air quality.
- 5.42 The Draft GCP does not repeat the policies contained within the GCT JCS or LTP3, but it does seek to ensure through a number of policies that the environmental impacts of development are minimised. This includes Policy G12 seeking to achieve high quality design that positively contributes to climate change mitigation and adaptation, and Policy D10 which seeks to reduce air pollutants in localised sources and requires air quality assessments where appropriate. Given these findings, alongside the findings of the appraisal for transport and accessibility it is not considered likely that the Draft GCP will have significant negative effects on air quality.

Appraisal of Proposed Site Allocations

- 5.43 As the main source of atmospheric pollution in Gloucester City is related to transport, the SA Framework has identified that the effects against SA Objective 6a (traffic) are considered to lead to indirect effects of the same nature and significance on the topic of air quality. Please therefore refer to findings under the transport and accessibility topic.

Synergistic and Cumulative Effects

- 5.44 It is considered that significant negative effects on air quality are unlikely as a result of the Draft GCP. GCT JCS and Draft GCP policies seek to address the impacts of proposed development on the highway network and improve active travel / sustainable travel access and choices. Given the urban nature of Gloucester City and its relatively high level of modal and transport connectivity it is considered that the Draft GCP has the potential for indirect positive cumulative effects by delivering development in accessible locations and encouraging a modal shift. Mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative cumulative effects on air quality.

Interrelationships with other Topics

- 5.45 Air quality is closely linked with transport and accessibility as increased levels of traffic can result in increased levels of atmospheric pollution. Poor air

⁹⁵ Gloucestershire's Local Transport Plan 2015-2031 – Overarching Strategy

quality has the potential for indirect long-term negative effects on health, climate change and the natural environment / ecosystems. Alternatively, when air quality is improved, this has the potential for indirect positive effects on the same topics. It is considered that there is sufficient mitigation provided through GCT JCS and Draft GCP policies to ensure that there will be no significant negative effects on air quality, and thus there is unlikely to be any significant negative indirect effects on other topics as a result.

Climate Change

SEA Directive Topics: Climatic Factors

Relevant SA Objectives:

- SA Objective 2: Reduce contribution to climate change and support households and businesses in reducing their carbon footprint and the use of natural resources.
- SA Objective 3: Improve the resilience of people, businesses and the environment to the unavoidable consequences of climate change.
- SA Objective 15: Integrate sustainable construction principles and standards into all development schemes.

Relevant GCP Topics Paper(s): Climate Change, Design

Appraisal of Draft GCP Policies

- 5.46 The growth and development proposed through the GCT JCS and delivered through the Draft GCP has the potential to negatively affect climate change by:
- Increased atmospheric pollution as a result of increased road users and increased traffic
 - An increase in demand and supply of energy from unsustainable sources, in the short term through construction and in the long term through occupation/operation
 - An increase in impermeable surfaces which can contribute to flood risk
 - A loss of green infrastructure supporting healthy functioning ecosystems
- 5.47 Flooding has been considered in the Water Resources, Water Quality and Flooding section of this report. The loss of green infrastructure is considered in the Biodiversity and Health and Equalities sections of this report. The effects of increased traffic on the roads are considered within the Transport and Accessibility and Air Quality sections of this report. These topics identify that given the mitigation provided through the GCT JCS and Draft GCP, development is unlikely to lead to any significant negative effects on flood risk (from all sources), green infrastructure networks and air quality.
- 5.48 There is the potential for minor negative effects on climate change through the inherent embodied energy in construction and maintenance of development. Over the life of the Plan technologies are likely to continue to improve and reduce the amount of embodied energy used; however, this remains a little uncertain at this stage.

- 5.49 All development proposals will need to accord with the sustainable design and construction principles contained in GCT JCS Policy SD4. The GCT JCS also supports proposals for the generation of energy from renewable resources or low carbon energy development (Policy INF6). This is further supported by Draft GCP Policies G16 and F8 which seek to exploit the renewable energy potential for the River and Canal and to deliver extra insulation and efficiency measures where renewable/low carbon generation is not practical or viable in development. Policy F10 explicitly states that development will be expected to mitigate against the impacts of climate change particularly through the provision of trees, green roofs, green open spaces and sustainable drainage systems.
- 5.50 The policy mitigation provided through the GCT JCS and Draft GCP is considered sufficient to ensure that development will not lead to any significant negative effects on climate change mitigation and adaptation. The Draft GCP further requires development to deliver provisions (particularly green infrastructure provisions) which will contribute to healthy functioning ecosystems with the potential for minor long term positive effects on climate change.

Appraisal of Proposed Site Allocations

- 5.51 The SA Framework has considered that all site allocations have the potential to meet energy efficiency standards, using sustainable design and construction methods and principles, with the potential for minor positive effects on climate change mitigation and adaptation.
- 5.52 The appraisal of site allocations has found that although the majority of the sites have the potential for minor negative effects on traffic and the highways network, and subsequently air quality, given the capacity of the sites, the mitigation provided through GCT JCS and Draft GCP policies should reduce the extent of these effects, with the potential for a residual neutral effect at most site allocations. Development within the housing zones (Greater Blackfriars and the Railway Corridor) and at site allocations 18, 20, 22, 29, 41 and 44 were considered to have the potential for residual minor negative effects given the higher capacity of these sites, and are thus considered to have the potential for indirect negative effects for air quality and therefore climate change. The Draft GCP also seeks to increase access to sustainable modes of transport and encourage a modal shift which will contribute to reducing the extent of these effects.
- 5.53 Site allocations located on greenfield land are considered to have the potential for severance of green infrastructure. Research has also demonstrated that brownfield sites can support a wide range of habitats and species⁹⁶ and thus have significant biodiversity values and it is recommended that Phase 1 Habitat Surveys are undertaken at early stages on brownfield sites to identify their biodiversity value and the required level of mitigation if necessary. The site allocations therefore are all likely to contribute to healthy

⁹⁶ TCPA (2004) Biodiversity by Design – A guide for sustainable communities

functioning ecosystems and long-term climate change mitigation. GCT JCS and Draft GCP policies should ensure that development at any of the sites will not result in any significant negative effects on biodiversity, and thus reduce the extent of potential indirect cumulative negative effects on climate change in the long term.

Synergistic and Cumulative Effects

- 5.54 Overall the proposed development in the Draft GCP is likely to lead to minor indirect cumulative negative effects on climate change through the likely increase in road users and associated negative effects on air quality. The overall loss of greenfield land and severance of green infrastructure may also lead to minor indirect cumulative negative effects on climate change. Mitigation provided through the Draft GCP however seeks to avoid habitat fragmentation, deliver new green infrastructure in development, and supports a modal shift by increasing access to sustainable modes of transport. These measures will contribute to reducing the extent of the identified cumulative effects.

Interrelationships with other Topics

- 5.55 The nature and significance of the effects on climate change and flooding is closely linked to housing, employment and transport. Flooding is also closely linked to communities and human health as well as water quality, water supply, landscapes, energy supply, the historic environment and the economy. The mitigation provided through the Draft GCP should ensure that effects in these topics (discussed in the relevant sections) are not significant and will not significantly indirectly affect climate change.

Water Resources, Water Quality and Flood Risk

SEA Directive Topics: Water

Relevant SA Objectives:

- SA Objective 4: Reduce water use and conserve and improve the quality of water bodies in the Plan area.
- SA Objective 5: Protect floodplain from development likely to exacerbate flooding problems from all sources.

Relevant GCP Topics Paper(s): Flooding and Water Management

Appraisal of Draft GCP Policies

- 5.56 Development proposed in the GCT JCS and supported in the Draft GCP has the potential to have negative effects on water resources and water quality through increased abstraction and increased waste water. Development also has the potential to decrease water quality through increased surface water run-off and the associated polluting effect. The baseline information has highlighted that the water resource zone has sufficient water resources to meet needs from proposed development growth and therefore, there will be

no significant effects from proposed development on water resource quantities. The quality of a number of waterbodies in the Gloucester Tributaries catchment however are not achieving European objectives for good ecological water quality status due to effects from urban and transport activities.

- 5.57 The GCT JCS requires development proposals to demonstrate that there will be no unnecessary harm to the water environment as a result of development and that any proposals must meet national standards (Policy SD4). Where possible, the GCT JCS states that the authorities will encourage proposals to exceed these standards. GCT JCS Policy SD4 requires proposals to demonstrate that development is designed to use water efficiently, will not adversely affect water quality, and will not hinder the ability of a water body to meet the requirements of the Water Framework Directive. This provides strong protection for water quality objectives and should mitigate for any potential negative effects.
- 5.58 Policy F7 and F10 within the Draft GCP encourage the use of sustainable drainage systems which protect the quality of the receiving watercourse and groundwater, and Policy F7 further requires large scale development to provide betterment of 20% on the calculated greenfield run off rate, and to contribute to new flood defences along the River Severn where appropriate. Increased recreation, for example, from additional boats, associated with the proposed development in the Docks area has the potential for pollution of water but mitigation is provided by JCS Policy SD4. Renewable energy development associated with the river is supported in Policy F8, which has the potential to affect water levels, however it is considered that suitable mitigation is provided through GCT JCS Policy SD4 and Draft GCP policies to ensure that development will not lead to any significant effects. It is not considered that development proposed through the GCP is likely to have a significant negative effect on water quality or resources given the mitigation available.
- 5.59 Flood risk poses a significant constraint for development in Gloucester and the GCT JCS provides policy mitigation for flood risk, advocating avoidance, sequential testing (Policy INF3) and protection against displaced effects in the wider catchment. Where there is the potential to exacerbate flood risk, the policy requires a flood risk assessment. This is reiterated in the GCP Policy F7 which rejects development that will be subject to flood risk or will lead to increased flood risk elsewhere. The policy mitigation provided should ensure that there will be no significant negative effects on flood risk.

Appraisal of Proposed Site Allocations

- 5.60 The appraisal of the site allocations found that the majority of the sites have the potential for a neutral effect on water quality. There exists an element of uncertainty for sites adjacent to water courses until project level details arise, however, mitigation provided through the GCT JCS and Draft GCP should ensure that any potential negative effects are not significant. A number of the site allocations are located within the Surface Water Safeguard Zone, however it is considered that suitable mitigation, including the use of

Sustainable Drainage Systems, is provided through the GCT JCS and Draft GCP policies to ensure that there will be no significant negative effects on this resource.

- 5.61 Site allocations 1, 3, 13, 23, 28, 40 and 45 were identified as located wholly or predominantly in a flood risk area, where mitigation may be difficult and/or expensive with the potential for minor to major long-term negative effects against this topic. A number of the site allocations were also located partially within a flood risk area; however, it was considered that development could avoid these areas on site with the potential for a residual neutral effect.

Synergistic and Cumulative Effects

- 5.62 Overall, the Draft GCP is not considered likely to have any significant cumulative effects on water resources, water quality or flood risk. Mitigation provided through the NPPF, GCT JCS and Draft GCP will protect the water environment and encourage the inclusion of water efficiency measures and sustainable drainage systems, as well as the provision of necessary infrastructure (including contributions to improved flood defences where appropriate).

Interrelationships with other Topics

- 5.63 Flooding can directly negatively affect housing, the economy and employment, water quality, water resources, energy supply, transport networks, biodiversity, cultural heritage and health. Water quality and resources are also closely linked to biodiversity and health, with the potential for both positive and negative effects.

Landscape & Historic Environment

SEA Directive Topics: Landscape

Relevant SA Objectives:

- SA Objective 8: Protect and enhance landscape character.
- SA Objective 9: Protect and enhance the distinctive townscape quality and historic heritage and its setting.

Relevant GCP Topics Paper(s): Natural Environment, Design

Appraisal of Draft GCP Policies

- 5.64 The delivery of new housing and employment development has the potential to both negatively and positively affect townscape character and settings, as well as important views and vistas. Gloucester is located adjacent to the Cotswolds AONB, and as such, development has the potential to negatively affect the setting of the AONB.
- 5.65 The GCT JCS seeks to mitigate potential negative effects on the landscape. GCT JCS Policy SD7 seeks to protect landscape character, local distinctiveness (including types, patterns, and features that make a significant

contribution to character, history and setting), and visual sensitivity. GCT JCS Policy SD8 requires development in or adjacent to the AONB to conserve, and where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Further mitigation to protect and enhance the AONB landscape is provided through policies contained within the Cotswolds AONB Management Plan. The policy mitigation provided through the GCT JCS and Cotswolds AONB Management Plan will ensure that development within Gloucester City does not detract from the AONB or its setting.

- 5.66 The Draft GCP provides further mitigation for potential negative effects. Policy L1 requires Landscape & Visual Impact Assessment in development proposals of over 10 dwellings and seeks to ensure that special landscape qualities are retained and safeguarded. Policies F2 and F4 further seek to protect existing trees, hedgerows and watercourses, as well as encourage new planting. New planting and landscape enhancements are considered to have the potential for minor long-term positive effects on landscapes.
- 5.67 Design policies within the Draft GCP seek high quality materials and finishes in development, which are locally distinctive and respond to the positive character and appearance of Gloucester (Policy G3). They also require landscape schemes to accompany development proposals (Policy G4) and seek townscape improvements through high quality design, public realm enhancement, and public art (Policies G12, G7 and G8). Policy G17 also seeks to protect key views of the Cathedral and other historic places of worship identified and protected in the Heights of Buildings SPD, which will ensure that development does not lead to any significant negative effects on important views and vistas.
- 5.68 The policy mitigation provided through the GCT JCS and Draft GCP is considered sufficient to ensure that development in Gloucester City will not lead to any significant negative effects. Policies that encourage townscape improvements are considered to have the potential for minor long-term positive effects.

Appraisal of Proposed Site Allocations

- 5.69 In the absence of key evidence (Townscape Sensitivity Study), the assessment of effects on the landscape has been based on the nature of the site as greenfield or brownfield land, and whether development could regenerate buildings that currently detract from the landscape (e.g. empty/redundant buildings). It should also be noted that the assessment will be updated to reflect the findings of the Townscape Sensitivity Study when this evidence emerges, and this should remove uncertainties arising from the information gaps.
- 5.70 The assessment found that 26 of the site allocations could contribute to improving townscape character through the redevelopment of brownfield land and high-quality design, with the potential for minor long term positive effects on landscapes. Site allocations that would result in the loss of greenfield land are considered to have the potential for minor long-term

negative effects on landscape through development in a previously undeveloped area. Given the distance of the sites from the AONB, development at any of the site allocations is not considered likely to affect the setting of the Cotswold AONB.

Synergistic and Cumulative Effects

- 5.71 Given the policy mitigation provided through the GCT JCS and Draft GCP, the development proposed is considered unlikely to lead to any significant negative cumulative effects on the landscape. There is the potential for minor cumulative negative effects through the loss of greenfield land which will inevitably change the landscape to some degree through development in a previously undeveloped area. The appraisal has identified significant potential for positive townscape improvements at individual site allocations, which can lead to long term positive cumulative effects on townscape.

Interrelationships with other Topics

- 5.72 The landscape is influenced by and affects a number of the topics considered through the SA. Potential negative effects on the water environment, air quality, biodiversity, heritage and soil can also have indirect negative effects on the landscape. Changes to the landscape can affect communities, health, heritage and biodiversity both positively and negatively. It is considered that policy mitigation is sufficient to ensure that there will no significant indirect negative effects.
- 5.73 A significant proportion of the development proposed through the Draft GCP is located within the central area of Gloucester, which is also the historic core with significant designated and non-designated heritage assets. It is considered that the townscape setting and the setting of heritage assets in this respect are intrinsically linked - effects on heritage settings are likely to lead to indirect effects on landscapes and vice versa. Potential effects on the setting of designated and non-designated heritage assets are discussed in the Cultural Heritage section, and are not considered likely to be significant, and thus are unlikely to lead to significant indirect effects on landscapes.

Biodiversity

SEA Directive Topics: Biodiversity, Flora and Fauna

Relevant SA Objectives:

- SA Objective 1: Protect, restore, create, enhance and improve connectivity between habitats, species and sites of wildlife or geological interest.

Relevant GCP Topics Paper(s): Natural Environment

Appraisal of Draft GCP Policies

- 5.74 The Plan area contains a number of local biodiversity designations (including a Nature Improvement Area) and two nationally designated SSSIs.

- 5.75 Given the SA findings for other topics such as transport, air quality, water resources and water quality, it is considered unlikely that there will be any major negative effects on biodiversity as a result of increased pollution. Whilst there is the potential for negative effects through the loss of habitats as a result of the location of development, this is more appropriately addressed through consideration of specific site allocations.
- 5.76 One of the key negative effects likely to arise as a result of development is related to the overall loss and fragmentation of habitats. Important habitat corridors should be protected and maintained as the connectivity of habitats is important for the long-term integrity of biodiversity.
- 5.77 Mitigation is provided through the GCT JCS. Policy SD10 seeks to protect European, nationally and locally designated sites for biodiversity and geodiversity from unacceptable negative effects. It also encourages new development to:
- Contribute positively to biodiversity
 - Create links with wider networks of green infrastructure
 - Create or restore priority landscapes, priority habitats and populations of priority species
- 5.78 This is supported by Draft GCP Policy F2 which seeks to resist small scale piecemeal erosion of biodiversity networks. Although development within the Nature Improvement Area (NIA) is not restricted (over and above flood risk constraints), Draft GCP Policy F3 requires appropriate mitigation and compensation measures in development proposals to contribute to overall NIA target species and habitats. Policy F4 further seeks to avoid negative effects on trees, woodland and hedgerow habitats that support wildlife interests. The policy mitigation provided through the GCT JCS and Draft GCP is considered sufficient to ensure that development in Gloucester will not lead to any significant negative effects on biodiversity.
- 5.79 It should be noted that Policy G15 seeks to control Gull populations, to minimise the risks to public health and reduce the associated impacts on buildings and townscape (excrement, stone throwing and aggression). Whilst it is appreciated that significant Gull populations can be a nuisance, they are protected under the Wildlife and Countryside Act 1981. The Policy seeks to undertake all viable steps to prevent gull roosting, nesting and damage. It is recommended that policy wording and reasoned justification wording is amended to identify what is considered 'viable' steps, with an additional clause that prioritises non-lethal solutions.

Recommendation: The SA recommends that policy wording and reasoned justification wording is amended to identify what constitutes 'viable' steps to prevent gull roosting, nesting and damage, with an additional clause prioritising non-lethal solutions.

Appraisal of Proposed Site Allocations

- 5.80 The appraisal of the site allocations found that the majority of the sites have the potential for a residual neutral effect on biodiversity. Development at site allocations 21 and 41 is considered to have the potential for minor negative effects due to the presence of locally designated biodiversity or protected species/habitats on site, however, mitigation provided through GCT JCS and Draft GCP policies is considered sufficient to ensure that there will be no significant negative effects.
- 5.81 A large proportion of the site allocations are located on brownfield land. Research has demonstrated that brownfield sites can support a wide range of habitats and species⁹⁷ and thus have significant biodiversity values. In this respect Phase 1 Habitat Surveys could help to identify biodiversity values at the site allocations. Mitigation provided through the GCT JCS and Draft GCP should ensure that development will not lead to any significant negative effects on biodiversity, however the presence of important species on site has the potential to delay development whilst appropriate surveys and mitigation are undertaken. By identifying biodiversity values at early stages of planning, risk of disturbance can be reduced, and the extent of any required mitigation can be appropriately planned for.

Suggestion: Policy / accompanying text wording to encourage early Phase 1 Habitats Survey on brownfield sites.

Synergistic and Cumulative Effects

- 5.82 The GCT JCS and Draft GCP seek to protect important designated and non-designated biodiversity from adverse effects. Policies also seek positive contributions to biodiversity networks and seek to avoid fragmentation of habitats. Overall it is not considered likely that development will lead to any significant negative cumulative effects on biodiversity. Policies that seek biodiversity enhancement (e.g. Policy F3 seeking development contributions to the Nature Improvement Area) can lead to long-term minor positive cumulative effects.

Interrelationships with other Topics

- 5.83 The natural environment is influenced by and affects a number of the topics considered through the SA. Potential negative effects on biodiversity can also have indirect negative effects on communities, health, climate change, air quality, water quality and flooding. Similarly, improvements to biodiversity can also have benefits for these topics. It is considered that there is sufficient mitigation available through the GCT JCS and Draft GCP to ensure that there will be no significant negative indirect effects.

⁹⁷ TCPA (2004) Biodiversity by Design – A guide for sustainable communities

Soil

SEA Directive Topics: Soil

Relevant SA Objectives:

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

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

Appraisal of Draft GCP Policies

- 5.84 The Plan area contains small areas of best and most versatile agricultural land on the peripheral of the city, and development has the potential to negatively affect soil quality through direct loss of this resource, or by potential contamination effects. The Minerals Local Plan⁹⁸ also safeguards existing sites for mineral working within the City and development has the potential to hinder future access to or use of mineral deposits, with the potential for minor negative effects.
- 5.85 Mitigation for the identified effects is provided through the GCT JCS. Policy SD15 requires that development must not result in unacceptable levels of soil pollution, and Policy SD4 seeks to avoid unnecessary sterilisation of mineral resources or contamination of land. Further mitigation is also provided through the Draft GCP. Policy D12 restricts development that may be liable to soil pollution, and Policy D13 requires prior investigations and mitigation plans in development proposals on land which may be contaminated.
- 5.86 It is considered that there is sufficient mitigation provided through policies contained within the GCT JCS and Draft GCP to ensure that there will be no significant negative effects on soils.

Appraisal of Proposed Site Allocations

- 5.87 Only one of the site allocations was found to contain best and most versatile agricultural land (site allocation 20 – Land East of Waterwells), and over half of this site is grade 3a agricultural land. The loss of this land through development at the site is considered to have the potential for a permanent major negative effect on soils. Development at any of the site allocations will not lead to the loss of existing safeguarded mineral workings.
- 5.88 A significant number of the site allocations would involve the regeneration of previously developed land with the potential for minor to major long-term positive effects on soil quality. Site allocations located on predominantly greenfield land were considered to have the potential for minor long-term negative effects on soils through the development of a previously undeveloped area.

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

Synergistic and Cumulative Effects

- 5.89 Overall the GCP seeks to locate the majority of new development proposed through the Plan on brownfield land, which will contribute to the retention and protection of soil quality, however development will inevitably result in the loss of some greenfield land with the potential for a minor long term negative cumulative effect on soils. However, given the available mitigation it is considered unlikely that the Draft GCP will to lead to any significant negative cumulative effects on soil quality.

Interrelationships with other Topics

- 5.90 The natural environment is influenced by and affects a number of the topics considered through the SA. Potential negative effects on the natural environment can also have indirect negative effects on communities and health, climate change, air quality, water resources, water quality, and flooding. Similarly, improvements to the natural environment can also have benefits for these topics. It is considered that there is sufficient mitigation available through the GCT JCS and Draft GCP to ensure that there will be no major indirect negative effects.

Cultural Heritage

SEA Directive Topics: Cultural Heritage

Relevant SA Objectives:

- SA Objective 9: Protect and enhance the distinctive townscape quality and historic heritage and its setting.
- SA Objective 25: Protect and enhance the cultural heritage and offering of individual settlements.

Relevant GCP Topics Paper(s): Historic Environment, Design

Appraisal of Draft GCP Policies

- 5.91 The employment and housing development proposed in the GCP has the potential for significant effects on the topic of Cultural Heritage. Development has the potential to negatively affect heritage assets through changes to character and / or settings. Conversely, development also has the potential for positive effects, through:

- changes that enhance the character and / or setting of designated and non-designated heritage assets,
- by bringing redundant buildings back into use, by improving access and signage,
- and by securing long-term conservation for heritage assets 'at risk'.

- 5.92 Mitigation is provided through Policy SD9 in the GCT JCS, which requires development to make a positive contribution to local character and distinctiveness and conserves designated and undesignated heritage assets

and their settings in a manner appropriate to their significance. The Policy also looks to secure future conservation, or bring back into use, vacant or derelict heritage assets and heritage assets 'at risk'.

- 5.93 Whilst the GCT JCS provides protection for heritage assets and their settings, the policy remains a strategic policy with less locally specific information. The GCP therefore presents an opportunity to identify locally specific constraints and opportunities, as well as values and characteristics that contribute to enhancing local settings. This can support and guide development proposals to help achieve high quality standards and positive enhancements.
- 5.94 Policy E1 sets the criteria that development must meet in order to be permitted, which includes the use of traditional, local materials, consideration of the curtilage of heritage assets, and the compatibility of the proposed development with the use of the heritage asset. This is supported by Policy E4 which seeks to ensure that shopfront, shutter and sign design is congruent with the character of the area, and together these policies protect locally specific heritage characteristics to support high-quality and responsive design.
- 5.95 The GCP area has rich archaeological heritage, some of which is of national importance, but remains undesignated. The GCP will be key to addressing the potential impacts arising on archaeology in this respect. Policy E1 seeks to protect non-designated archaeological remains in a manner proportionate to that undertaken for Scheduled Monuments, which is supported by Policy E3 seeking to retain Buildings of Local Importance (identified on the Local List). Policy E2 also seeks to ensure that appropriate investigation and recording of heritage assets is undertaken prior to any loss.
- 5.96 The policy mitigation provided through the GCT JCS and the Draft GCP is considered sufficient to ensure that development will not lead to any significant negative effects on the historic environment and cultural heritage. Policy guidance contained within the Draft GCP also presents opportunities for minor positive effects on the historic environment through high-quality, responsive design and the support of positive enhancements.

Appraisal of Proposed Site Allocations

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

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

Synergistic and Cumulative Effects

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

Interrelationships with other Topics

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

Waste and Recycling

SEA Directive Topics: Material Assets

Relevant SA Objectives:

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

Relevant GCP Topics Paper(s): Design

Appraisal of Draft GCP Policies

- 5.100 Development has the potential to increase waste generated, both through construction, and as a result of occupation of new housing and employment development. The policies contained within the Waste Core Strategy⁹⁹ provide mitigation for the negative effects associated with an increase in waste, including Policy WCS2 which seeks waste reductions, and Policy WCS3

⁹⁹ Gloucestershire County Council (2012) Gloucestershire Waste Core Strategy

promoting recycling and composting. This mitigation is supported through Policy SD4 in the GCT JCS which requires sustainable design and construction that includes the minimisation of waste. Although there are no further dedicated policies for waste within the Draft GCP, it is considered that the directions and mitigation provided through the Waste Core Strategy and GCT JCS, and available at the project level, are sufficient to ensure that there will be no significant negative effects in the delivery of the GCP.

Appraisal of Proposed Site Allocations

- 5.101 The SA Framework has identified that all site allocations could minimise the creation of waste and promote the waste hierarchy, with the potential for minor positive effects against this topic. The mitigation provided through the Waste Core Strategy and GCT JCS should ensure that new development contributes to minimising waste and effectively manages waste according to the waste hierarchy.

Synergistic and Cumulative Effects

- 5.102 Development is considered to have the potential for minor negative cumulative effects on waste and recycling by increasing the overall rate of generation and disposal of waste. However, this is strategically planned for through the Gloucestershire Waste Core Strategy and GCT JCS, which provides sufficient mitigation to ensure that there will be no significant negative effects.

Interrelationships with other Topics

- 5.103 Waste management is closely linked with communities and health and the landscape, with the potential for both negative and positive indirect effects. Existing policy mitigation is considered sufficient to ensure that development will not lead to any significant negative effects, and indirect effects are therefore unlikely.

Equality Impact Assessment (EqIA)

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

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

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

Habitats Regulations Assessment (HRA)

- 5.109 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites¹⁰⁰.
- 5.110 The HRA process for the GCP is informed by the findings and conclusions of the HRA process for the GCT JCS. The Pre-Submission Draft GCT JCS HRA Report¹⁰¹ (May 2014) concluded that the mitigation provided through GCT JCS policies and available at the project level is sufficient to ensure that there will be no adverse effects on any European sites as a result of proposed development either alone or in combination.
- 5.111 An initial screening assessment of the Draft GCP was carried out to determine if the emerging policies and potential sites have the potential for likely significant effects on any European sites. The screening found that none of the European sites identified will suffer from significant alone or in combination effects from atmospheric pollution, disturbance or changes in water levels and quality caused by the Draft GCP. The screening found that although some sites were at risk to significant effects, policy mitigation provided through the Draft GCP and GCT JCS was comprehensive enough to ensure that the European sites will not be affected.

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

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

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

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

- 6.1 The City Council considered the representations¹⁰² made to the draft GCP at the Regulation 18 consultation stage and has made amendments to further develop the Plan to the Pre-Submission stage. Many of the changes are minor and most relate to updating, addressing gaps in information and provision of more clarity. Most Policies have been refined through these minor amendments. Certain Policies have been developed that are likely to be significant for the findings of the previous SA and including a new Policy E8 on Development affecting the Cotswold Beechwoods Special Area of Conservation.
- 6.2 JCS Policy SP1 sets out that at least 14,359 new homes will be needed in the Gloucester City area over the plan period 2011 to 2031. As of April 2019, 3,993 homes have already been delivered since 2011 and there are 2,339 commitments. 972 dwellings are proposed through the site allocations SA01- SA22 in GCP with a number of the bigger sites being central brownfield sites in need of regeneration. 620 new homes will be delivered through the Winneycroft Strategic Allocation south of Matson estate in Gloucester and 4,520 through the Strategic Allocations in Tewkesbury Borough allocated to meet Gloucester's housing need. A further 375 dwellings within these Strategic Allocation are projected to be delivered after 2031.
- 6.3 Despite this provision there is a shortfall for Gloucester of over 1,000 dwellings in the later years of the JCS timeframe. It is likely that some of this shortfall will be made up through sites or opportunities that come forward in Gloucester, but some of the provision is likely to be found through the JCS Review process.
- 6.4 Windfall development in Gloucester will have to accord with GCP Development Management policies that will, alongside those in the JCS, guide development over the plan period to 2031.
- 6.5 The Site Allocations have been amended to reflect the updated situation. Seven previously proposed site allocations have been removed as these now have planning permissions or there is uncertainty over availability/deliverability; 12 previously proposed site allocations are still available, deliverable and have been progressed further into the Regulation 19 GCP. A further 10 new site options have been identified and were found to be reasonable such that they have been subject to SA using the full SA framework (reported here in Appendix IV).
- 6.6 The changes to the Plan through development from Draft to Pre-Submission and with significance for the SA are summarised in Table 6.1, as follows:

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

Table 6.1: Changes to the Plan with Significance for SA

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

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

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

Proposed Site Allocations

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

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

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

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

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

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

Representations to the Regulation 18 SA Report (2016)

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

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

Refining Policies: Implications for SA Findings

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

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

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

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

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

- 6.25 **Policy D2 Non-Designated Heritage Assets:** The Policy includes additional text to make explicit that proposals for demolition or total loss will be subject to a balanced assessment taking into account the significance of the asset, the scale of harm or loss, and that all reasonable steps have been taken to retain the asset, including an assessment of alternative uses. This strengthening of the policy confirms that sufficient mitigation measures are in place to protect non-designated heritage assets, confirming the previous SA findings for residual neutral effects.
- 6.26 **Policy E1 Landscape Character & Sensitivity:** The Policy has been enhanced to make explicit that trees, hedgerows and areas of green that are not otherwise protected, but which contribute to local landscape character, should where at all possible be retained and utilised. This strengthens the mitigation provided through the policy and confirms the previous SA findings; the further requirement for protection of local vegetation that is not otherwise protected will contribute overall to cumulative improvements in the longer term.
- 6.27 **Policy E2 Biodiversity & Geodiversity:** The Policy has been reworked with merging of previous drafts for clarification. There is additional reference to ecological networks; all development is required to provide net gains to the ecological network and proposals that affect local sites must secure a net gain in biodiversity (and in line with the revised NPPF and emerging new requirement¹⁰⁴). The policy includes three new criteria for the different categories of designation from international, national through to local and it sets out explicitly the requirements from new development for each category. Criterion 1 sets out that there must be no adverse effects on the integrity of internationally designated sites – SPAs, SACs, and Ramsar. Criterion 2 specifically refers to a requirement for no wider indirect or cumulative effects on the national network of SSSIs. Criterion 3 specifically requires a net gain in biodiversity to be secured from new development. The considerable reworking of the policy is significant for both the SA and the HRA.
- 6.28 The expansion and reworking of the policy responds to concerns raised by Natural England and updates the situation with regard to the revised NPPF (paragraph 170) and emerging changes to planning policy that are likely to require net gains in biodiversity from all new development when granting planning permission. Thus, this revised Policy E2 provides interim guidance until the review of the JCS is completed and whilst recreational studies are

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

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

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

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

- 6.34 Policy E8 requires that in order to retain the integrity of the SAC all development that leads to a net increase in dwellings will be required to mitigate any adverse effects of increased recreational pressure. Development proposals must contribute towards mitigation specified in the SAC mitigation and implementation strategy or through a bespoke Habitats Regulations Assessment. Development that is likely to generate road traffic emissions to air which are capable of affecting the SAC will be screened against the Habitats Regulations Assessment Framework in line with Natural England's guidance¹⁰⁵. This additional Policy provides clear and strong mitigation measures that will ensure no adverse impacts on the integrity of the Cotswold Beechwoods SAC, alone or in-combination with other plans and projects.
- 6.35 **Policy G1 Sustainable Transport:** The policy includes new wording to make explicit that the City council strongly supports and encourages improvements to the sustainable transport network. The previous SA considered that sufficient mitigation is provided through the GCT JCS and Draft GCP policies to ensure that there will be no significant negative effects on sustainable transport. The new explicit support and encouragement for sustainable transport is likely to promote positive effects that could be synergistic and cumulative in the longer term for SA Objective No 6.
- 6.36 **Policy G2 Charging Infrastructure for Electric Vehicles:** New Policy that makes provision for charging points for residential and non-residential development. This requirement will contribute to positive effects for SA Objective No 2 and No 3 on climate change, and No 11 Pollution.
- 6.37 **Policy G3 Cycling & Policy G4 Walking:** New policies that reflect the changing concerns about climate change and the commitment from the City Council to aim for carbon neutrality by 2050. Policy G4 explains that the Council wishes to encourage comprehensive city-wide cycling initiatives in line with the County Council LTP. Development will be supported where it improves cycle routes to sustainable transport hubs; also, access improvements to the outer ring road, the canal towpath, and the A40 corridor between Gloucester and Cheltenham. Policy G5 explains that the Council will support development that protects and enhances convenient, safe and pleasant walking environments, including linking neighbourhoods and green infrastructure, and improvements for walking routes to sustainable transport hubs.
- 6.38 These new policies that specifically support and encourage cycling and walking will strengthen the findings of the previous SA with positive effects for SA Objective 2 & 3 Climate Change, No 6 Sustainable Transport, No 11 Pollution, and No 17 Health. The positive effects should be synergistic and cumulative in the longer term.

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

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

Refining Site Allocations: Implications for SA Findings

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

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

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

Table 6.3: Site Allocations

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

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

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

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

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

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

Table 6.4: SA of Site Allocations – Summary

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

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

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

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

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

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

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

- 6.52 All development sites are likely to need to demonstrate net gains in biodiversity in line with the revised NPPF and recent Government consultation¹¹⁰. Each Site Allocation includes requirements for site-specific ecological surveys and/or enhancements to trees/hedgerows and the green/blue infrastructure networks. These commitments to biodiversity gains changed the earlier SA findings of the site options from uncertain neutral to at least minor positive effects. Four sites were found to have potential major positive effects due to their larger capacity with more possibilities for creative design and contribution to green/blue infrastructure networks, including sustainable transport routes. Overall, the requirements for biodiversity net gains are likely to be synergistic and cumulative in the longer-term.
- 6.53 Mixed use or employment land sites were found to have minor positive effects for SA Objectives on economy/employment with major positive effects indicated for the larger sites. Similarly, with housing – mixed use or residential land sites were found to have minor positive effects for SA Objectives on housing with major positive effects indicated for the larger sites.
- 6.54 New development can contribute to reducing inequalities indicating minor positive effects for SA No 16 for all sites; certain sites (SA03, SA08, SA10, SA11, SA16 & SA19) were found to have likely major positive effects since the sites are located within more deprived areas – new development can help to resolve an existing sustainability problem.
- 6.55 Provision of good quality housing and access to sufficient employment land/jobs is associated with health and well-being. All residential and mixed-use site allocations are located within reasonable walking distance of existing health facilities indicating minor positive effects for SA No 17. Provision of, and access to, sustainable transport modes encourages a healthier lifestyle through facilitating cycling and/or walking. All residential and mixed-use site allocations are located within reasonable walking distance of sustainable transport options with at least minor positive effects indicated. Six sites were found to have likely major positive effects, either due to their closer proximity to the sustainable transport network and/or site-specific requirements to improve sustainable transport, for example SA04, SA05, SA08, SA10).
- 6.56 Most sites are within reasonable walking distance of public open space indicating likely minor positive effects. Most sites are within reasonable walking distance of educational facilities indicating minor positive effects. SA Objective No 25 is concerned with protection and enhancement of cultural heritage and for 8 sites the SA recorded uncertainty as there is insufficient evidence to make a reasonable judgment. However, the SA assumed that for many of the other sites within or in easy access of the city centre, there was

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

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

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

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

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

- 6.61 The importance of the natural environment to health continues to be recognised with Policy E1 Landscape, E2 Biodiversity, E4 Trees, Woodlands & Hedgerows, and E5 Green Infrastructure all contributing to safeguarding and enhancement of natural resources with positive effects or well-being. Certain policies are specifically concerned with protection of health – C3 Open Space, Playing Fields & Sports Facilities, C5 Air Quality, C6 Cordon Sanitaire, C7 Fall prevention from taller buildings, E6 Flooding, and F3 community Safety. All these will contribute to positive effects that will be cumulative in the longer term.
- 6.62 **Transport & Accessibility; Air Quality:** All the proposed Site Allocations have the potential to result in an increase in traffic and an increase in emissions. However, they have been selected to minimise the need to travel and promote more sustainable transport, where possible, including site-specific requirements where necessary. Policies G4 and G5 specifically support and encourage sustainable transport. Policy A5 air Quality requires that major development should not exceed EU limit values and should achieve national objectives for air pollutants. Particular mitigation measures are required for development within the City's AQMAs and in close proximity to sensitive receptors such as schools and hospitals. Site allocations SA05, SA11 & SA19 include site-specific requirements to demonstrate that they meet with these standards. Therefore, overall, there will be no significant negative effects from the implementation of the GCP and there are mechanisms in place that indicate minor positive effects that could be synergistic and cumulative in the longer term.
- 6.63 **Climate Change:** Policies such as E6 Flooding, and G3 & G4 on cycling and walking reflect the importance that the Council places on helping to address climate change and recognises the commitment¹¹¹ made by the Council aiming for carbon neutrality by 2050. Overall, this is likely to have positive effects that will be cumulative in the longer term.
- 6.64 **Water Resources, Water Quality & Flood Risk:** GCP Policy E6 Flooding, Sustainable Drainage, Watercourses & Wastewater has been expanded. The strengthening of Policy E6 confirms the previous SA findings and together with other policies, including site-specific requirements for Site Allocations SA02, SA06, SA07, SA08, SA09, SA10, SA11 & SA21, confirms that there will be no significant negative effects for flooding, water quality or water resources. The requirement in Policy E6 to facilitate watercourse restoration and site-specific requirements will contribute to enhancements and help resolve existing

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

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

- 6.65 **Landscape & Townscape:** GCP Policy E1 Landscape Character & Sensitivity, together with F1 Materials & Finishes, F2 Landscape & Planting and E2-E5 Green Infrastructure continue to protect and provide guidance on landscape and townscape. Further guidance is provided in site-specific requirements for the Site Allocations. This confirms the previous SA findings that the policy mitigation provided through the GCT JCS and the Draft GCP is considered sufficient to ensure that development in Gloucester City will not lead to any significant negative effects. Policies that encourage townscape improvements are considered to have the potential for minor positive effects that will be cumulative in the longer term.
- 6.66 **Biodiversity:** As discussed previously, the GCP Policy E2 Biodiversity & Geodiversity has been substantially rewritten in developing the Plan to Pre-Submission. This includes consideration of advice and comments from Natural England. It also incorporates the revision to the NPPF (2018)¹¹² with regard to environmental gain (paragraph 170) and the proposals (2019) to make biodiversity net gain necessary for developments when granting planning permission¹¹³. Thus, all development is likely to have at least minor positive effects on biodiversity; some Site Allocations were found to have likely major positive effects due to the benefits that they can provide. Overall, the GCP is proactively encouraging biodiversity improvements that have positive effects for wildlife, the wider environment and people that will be synergistic and cumulative, and helping to resolve existing sustainability problems.
- 6.67 **Soil:** GCT JCS Policy SD15 requires that development must not result in unacceptable levels of soil pollution, and Policy SD4 seeks to avoid unnecessary sterilisation of mineral resources or contamination of land. The GCP provides further local policy guidance. GCP Policy B3 requires that employment development should not result in unacceptable impacts on soil. The Site Allocations have been selected to avoid the best and most versatile agricultural land where possible; six sites re-use brownfield land indicating major positive effects for avoiding greenfield and loss of the soils resource. Seven sites do include use of greenfield land and these will result in the loss of the soils resource that will be permanent with minor negative effects. Overall, a mix of positive and negative effects – with mostly positive through the careful selection of sites.
- 6.68 **Cultural Heritage & Historic Environment:** GCP Policies D1-D5 continue to safeguard and encourage enhancement of the historic environment. Site-specific requirements for certain Site Allocations provide mitigation measures, such as requirements for archaeological assessments, that remove some of the uncertainties in the earlier SA work and confirming that mechanisms are in place to ensure that there are no significant negative effects. Some uncertainty of the type and effectiveness of mitigation remains for some sites until project level studies have been completed. Overall, the policy mitigation provided through the GCT JCS and the Draft GCP is considered sufficient to

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

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

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

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

Equality Impact Assessment (EqIA)

- 6.74 An EqIA is a tool which seeks to improve the work of the Council and ensure that it meets the requirement of the Equality Act 2010. This Act applies to the provision of services and public functions and includes the development of Council Policies and Plans. The Act prevents discrimination on the basis of nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 6.75 Inequality can exist in a number of forms and with regard to land use planning, this could include inadequate provision of and access to services (health, food stores, education facilities), good quality homes, employment opportunities, a healthy living environment, and transport infrastructure (roads, pavements, public transport) for all members of society.
- 6.76 Assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the Sustainability Appraisal process. All aspects of the developing GCP have been appraised against the SA framework including several SA objectives that directly and indirectly address equality, health and diversity, as follows: No.3, No.5, No.6, No.8, No.9, No.12, No.13, No.14, No.16, No.17, No.18, No.19, No.20, No.24, No.25. The findings of this EqIA have been integrated into the SA of the GCP and are provided separately as Appendix V to this SA Report.
- 6.77 The screening assessment undertaken of the emerging draft GCP in 2016 and updated in 2019 has found that the GCP is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and, as a result, a full EqIA will not be required.

Habitats Regulations Assessment (HRA)

- 6.78 The Conservation of Habitats and Species Regulations 2017 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites¹¹⁴.
- 6.79 The initial screening in 2016 had found that although some designated sites were at risk to significant effects, policy mitigation provided through the Draft GCP and GCT JCS was comprehensive enough to ensure that the European sites will not be affected. However, Natural England was concerned that the mitigation strategy work and recreational studies associated with the JCS had not progress sufficiently to enable such a conclusion. The HRA screening was revised to align with changes in the process that had arisen through recent CJEUs and an appropriate assessment was undertaken in 2019.

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

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

7.0 Proposed Monitoring

Introduction

- 7.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance¹¹⁵ on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Gloucester City Monitoring Report (produced annually) alongside the monitoring framework provided in the GCT JCS is considered sufficient to ensure appropriate monitoring takes place

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

8.0 Consultation and Next Steps

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

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