

Gloucester City Council

Gloucester Local Development Framework



Site Allocations/Designations Issues & Options Consultation Sustainability Appraisal



October 2005
Policy, Design & Conservation



**SUSTAINABILITY APPRAISAL OF THE SITE ALLOCATIONS &
DESIGNATIONS (NON-CENTRAL AREA) ISSUES AND OPTIONS
CONSULTATION DOCUMENT**

OCTOBER 2005

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1. INTRODUCTION

- 1.1 This report outlines the findings of a Sustainability Appraisal carried out on the Site Allocations & Designations (Non-Central Area) Issues and Options Consultation Paper recently prepared by Gloucester City Council as part of the emerging Local Development Framework for Gloucester (the replacement to the Local Plan).
- 1.2 The Sustainability Appraisal which has been carried out is based on current Government advice and has full regard to the requirements of EC Directive 2001/42/EC – commonly referred to as the Strategic Environmental Assessment (SEA) Directive.
- 1.3 Each of the potential options set out in the document has been assessed and commentary provided accordingly. Potential mitigation to improve the performance of policies and proposals in ‘sustainability’ terms is suggested where appropriate.
- 1.4 The objective of the sustainability appraisal process is essentially to identify the most sustainable options in order to assist the public and other interested parties with their selection of a preferred option set of options.
- 1.5 Comments on the Sustainability Appraisal of the Site Allocations/Designations (Non-Central Area) document are invited until **19th December 2005**
- 1.6 All of the comments we receive will be taken into account and will feed into a ‘Preferred Options’ paper, which will be published for a further six-week period of public consultation in March/April 2006.

2. BACKGROUND

2.1 The Council is in the process of preparing a Local Development Framework for Gloucester (LDF). This will replace the existing Local Plan. The LDF will consist of four separate but inter-linked documents including:

- Core Strategy
- Development Control Policies
- Central Area Action Plan; and
- Site Allocations/Designations (Non-Central Area)

2.2 These documents will be accompanied by a Proposals Map showing graphically where each policy and proposal applies.

2.3 Each of the documents listed above has to go through three stages of public consultation: Issues and Options, Preferred Options and Submission.

2.4 So far we have prepared Issues and Options papers for all four documents.

2.5 The Core Strategy and Development Control Policy documents were published earlier in the year and were subjected to a Sustainability Appraisal. The closing date for comments on those initial documents was 24th October 2005.

2.6 On 31st October 2005 we launched the remaining two Issues and Options consultation papers for the Central Area Action Plan and the Site Allocations & Designations (Non-Central Area) documents.

2.7 This document is the Sustainability Appraisal of the Site Allocations & Designations (Non-Central Area) document. It has been prepared to inform your response to the Issues and Options consultation paper itself.

2.8 A Sustainability Appraisal of the Central Area Action Plan is available separately.

What is Sustainable Development?

2.9 The commonly accepted definition of sustainable development is:

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

2.10 This definition was developed in the 1980s. More recently however it has been accepted that sustainable development has a social and economic perspective as well as being about the protection of the environment.

- 2.11 The Government acknowledges sustainable development as having four main aims:
- Social progress which recognises the needs of everyone
 - Effective protection of the environment
 - Prudent use of natural resources; and
 - Maintenance of high and stable levels of economic growth and employment
- 2.12 In essence, sustainable development is about having regard to a number of different environmental, economic and social objectives and taking these into account in the formulation of plans and programmes. It is an issue that is top of the Government's policy agenda.

3. THE SUSTAINABILITY APPRAISAL PROCESS

3.1 On July 28th 2005, the Council approved a Sustainability Appraisal '*Scoping Report*' which sets out the broad approach that the Council will take in subjecting each of the documents produced under the Local Development Framework, to a Sustainability Appraisal. The Scoping Report, plus a non-technical summary, is available to download online at www.gloucester.gov.uk. Hard copies may also be viewed and/or purchased from the City Council Offices.

3.2 The Scoping Report was subject to consultation with the Environment Agency, the Countryside Agency, English Nature, English Heritage and a number of other relevant organisations. It identifies the main national, regional and local policy influences on Gloucester as well as the current baseline state of the City in environmental, social and economic terms. From this assessment, the scoping report draws out the key issues facing Gloucester and translates these into a number of sustainable objectives.

3.3 Key sustainability issues identified for Gloucester include:

Economic Issues

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

Social Issues

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

Environmental Issues

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

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

3.5 Our nine headline objectives are based on the objectives of the Regional Sustainable Development Framework for the South West (2001) or RSDF for short.

3.6 They include:

1. Protecting the City's most vulnerable assets
2. Delivering sustainable economic growth
3. Minimising consumption of natural resources and the production of waste
4. Ensuring everyone has access to the essential services they require and that local needs are met
5. Improving standards of health and education
6. Making Gloucester a great place to live and work
7. Reducing the need to travel
8. Improving environmental quality (air, water, land)
9. Reducing contributions to climate change

3.7 Under each of these headline objectives we have identified a number of sub-objectives, which are more detailed questions that will be asked of potential policies and proposals during the sustainability appraisal process.

- 3.8 For example, under headline objective 1, which is to protect the City's most vulnerable assets, a policy or proposal would be assessed in terms of whether it would minimise the risk of flooding, help to conserve and/or enhance natural habitats, conserve and/or enhance species biodiversity, maintain and/or enhance cultural and historic assets and so on.
- 3.9 Under headline objective 5, which is to improve standards of health and education, a policy or proposal would be assessed in terms of how well it would contribute towards improved health and enhancing people's ability to engage in healthy activities as well as whether it would improve access to health care facilities or improve access to opportunities for learning, training, skills and knowledge.
- 3.10 Clearly some objectives will be more relevant to certain policies and proposals than others. Thus for example a policy relating to the provision of affordable housing is unlikely to have much a direct impact in terms of nature conservation (unless it relates to a particular site with nature conservation value). The policy would however be directly related to the sustainable objective of ensuring that everyone has access to safe and affordable housing.
- 3.11 It is also important to remember that there may be less obvious linkages between policies and sustainability objectives. A good example is the link between design and reducing crime levels, which is not immediately obvious, however evidence suggests that it is possible through the use of good design to reduce the opportunity to commit crime e.g. by providing overlooking, good lighting and reducing the number of 'escape routes' available.
- 3.12 We have identified these less obvious linkages wherever possible.
- 3.13 The headline objectives and sub-objectives set out in the Scoping Report have been incorporated into a 'Sustainability Matrix' which is essentially a table of criteria that are to be applied to each option in order to determine how well it performs in sustainability terms.
- 3.14 Officer workshops were held in October 2005 during which the performance of each of the options set out in the Issues Papers documents was assessed. This included for all options the assessment of a 'do-nothing' or business as usual scenario, whereby the effect of not having a policy or proposal in place was also assessed for completeness.

3.15 Completed sustainability matrices are set out at Appendix 1 of this document. The matrices look at the likelihood of any impact, the likely timescale, whether the effect will be temporary or permanent, significant and/or cumulative and whether the impact will be localised, citywide or even cross-boundary. The impact of each option has been scored on the following basis:

- ++ Significant positive effect
- + Moderate positive effect
- 0 Neutral effect
- Significant negative effect
- Moderate negative effect
- ? Uncertain effect

3.16 Commentary on the main findings of the appraisal is set out in the following sections. We deal with the various issues and options as they are set out in the consultation paper.

4. LANDSCAPE & NATURE CONSERVATION

Landscape Conservation Areas

- 4.1 27% of the administrative area of Gloucester is designated as a Landscape Conservation Area. Current policy stipulates that these areas will be protected from any development that would detract from their character. Appropriate development may be permitted if it is vital to the economic and social well-being of the City and no other suitable sites are available.

The Options

- 4.2 There are essentially three options put forward. Option 1 is to continue with the current Landscape Conservation Area designations as set out in the Second Deposit Draft Local Plan (2002). Option 2 is to move towards an alternative approach based on the use of Landscape Character Assessments (as recommended in current Government Guidance). Option 3 is a 'do-nothing' scenario where the Council does not put in place any sort of landscape designation and relies solely on national and regional planning policy in order to protect its areas of particular landscape quality.

Overall Findings

- 4.3 Options 1 and 2 both score well in sustainability terms particularly in terms of conserving and enhancing natural and semi-natural habitats, species diversity and woodland cover. Indirect benefits will include improving the quality of where people live, maintaining and enhancing air, water and soil quality, providing access to green spaces and access to leisure opportunities.
- 4.4 There is little difference in sustainability terms between the option of continuing to delineate areas of landscape importance or the alternative of using character assessments.

Do-Nothing or Business as Usual Scenario

- 4.5 In not seeking to identify and protect areas of landscape importance under Option 3, the Council runs the risk of opening up such areas to greater development pressure and a consequential potential decline in environmental quality.
- 4.6 Although most of these areas are 'greenfield' and therefore protected to a certain extent by other policies, this is unlikely to be sufficient and we consider the use of a landscape designation (whether based on landscape character or traditional designations) to be absolutely essential.

Comment/Suggested Changes

- 4.7 A fourth option would be to increase the amount of land currently identified as being of landscape importance. This would obviously improve the performance of the policy in sustainability terms although would have to be fully justified in landscape terms.

Sites of Nature Conservation Interest (SNCIs)

- 4.8 We have at present 35 sites of nature conservation interest, which include a number of Key Wildlife sites (as identified by the Wildlife Trust). These are local designations and vary from the most important sites (Grade A) to less important sites (Grade D).

The Options

- 4.9 Essentially three options are put forward. Option 1 is to continue the Council's current approach, which is to identify areas of nature conservation interest on the proposals map and protect these from inappropriate forms of development. Option 2 is to move this approach on further and to more positively seek the enhancement and restoration of 'biodiversity' within these designated areas.
- 4.10 Option 3 is a 'do-nothing' scenario whereby the Council does not identify any areas of nature conservation interest. Under this scenario, the protection of areas of nature conservation interest would be reliant on other designations such as the Key Wildlife Sites as designated by the Wildlife Trust and nationally designated sites such as Sites of Special Scientific Interest (SSSIs), which are discussed in more detail below.

Overall Findings

- 4.11 Options 1 and 2 both score well in sustainability terms. Particular sub-objectives that would be met include the protection and enhancement of natural and semi-natural habitats, conserving and enhancing species biodiversity and maintaining and enhancing sites that are designated for their nature conservation interest. The objective of protecting woodland also applies as Matson Wood is identified as a site of nature conservation importance.
- 4.12 Option 2 scores higher because it is more likely to lead to the positive enhancement of biodiversity within sites of nature conservation importance as well as simply protection and conservation. Arguably however, securing biodiversity enhancements within sites of nature conservation importance might be better tackled through the wording of the policy or policies which will apply to these areas (as set out in the Development Control Policies Development Plan Document) – not their actual boundaries on a Proposals Map.

Do-Nothing or Business as Usual Scenario

- 4.13 The 'do-nothing' or 'business as usual' scenario scores poorly in sustainability terms as it may lead to increased pressure for development on sites of nature conservation importance. This may lead to the loss of habitats and species unless satisfactory mitigation is secured. This is unlikely to be achieved unless areas of nature conservation importance are defined as such.

Comment/Suggested Changes

- 4.14 An approach that seeks to ensure biodiversity is not only protected but restored and enhanced wherever possible, scores most highly in sustainability terms although this is likely to be best achieved through the wording of the relevant Development Control Policy rather than the delineation of boundaries through this document.

Sites of Special Scientific Interest (SSSIs)

- 4.15 SSSIs are the Country's very best wildlife and geological sites. There are over 4,000 SSSIs in England. We have two in Gloucester at Hucclecote Hay Meadows and Robinswood Hill Quarry.
- 4.16 Government Policy seeks to protect SSSIs from any development that would have an adverse effect.

The Options

- 4.17 Because these are nationally drawn up designations, we have not put forward alternative options other than to continue to delineate and protect the two existing SSSIs in Gloucester. Other SSSIs may be identified in the future.
- 4.18 The do-nothing option does not apply in this instance because these are national designations and not identifying them within the LDF is not an option.

Overall Findings

- 4.19 The delineation of SSSIs scores highly in sustainability terms. Particular sub-objectives that would be met include: the conservation and enhancement of semi-natural and natural habitats, conservation and enhancement of species diversity, maintenance and enhancement of sites designated for their nature conservation interest. Indirect benefits may include improved air, soil and water quality and reducing contributions to climate change (albeit at a very small scale).

Do-Nothing or Business as Usual Scenario

- 4.20 Not applicable.

Comment/Suggested Changes

- 4.21 None.

Prime Biodiversity Areas

- 4.22 The Second Deposit Draft Local Plan (2002) identifies a Prime Biodiversity Area (PBA) on the un-built land to the west of the Gloucester and Sharpness Canal (including Hempsted Landfill) and Alney Island. This area is part of the strategically important River Severn Corridor.

The Options

- 4.23 Essentially two options are put forward. Option 1 is to maintain the current PBA designation as set out in the Second Deposit Draft Local Plan (2002). Option 2 is a do-nothing scenario whereby the current PBA designation would effectively be withdrawn.

Overall Findings

- 4.24 Prime Biodiversity Areas are areas that have or potentially have, particular concentrations of high priority habitat. Within these areas there is a high potential for habitat and species restoration and enhancement.
- 4.25 Option 1 scores highly in sustainability terms. Particular sub-objectives that would be met include the conservation and enhancement of species diversity and the protection of existing species.

Do-Nothing or Business as Usual Scenario

- 4.26 The 'do-nothing' scenario would place the area currently delineated as PBA under increased development pressure, although it is recognised that other policies applicable to this area will preclude inappropriate development to a large extent, not least the extent of the River Severn Floodplain.
- 4.27 Notwithstanding this, it is considered that the PBA designation offers valuable useful protection and greater scope for achieving the conservation and enhancement of species diversity in this strategically important area.

Comment/Suggested Changes

- 4.28 Enlarging the current PBA or identifying other areas of particular biodiversity importance would improve the performance of the allocation in sustainability terms although any such change would need to be robustly justified.

Robinswood Hill Country Park

- 4.29 Robinswood Hill Country Park was established in the 1960s to satisfy the demand for informal recreation. The Park is designated in the Second Deposit Draft Local Plan as public open space and a site of nature conservation importance.

The Options

- 4.30 Effectively two options are put forward. Option 1 is to maintain this designation and Option 2 is the 'do nothing' scenario whereby the site is not designated for any purpose.

Overall Findings

- 4.31 Continuing to allocate Robinswood Hill Country Park as public open space and as a site of nature conservation importance scores highly in sustainability terms. Particular sub-objectives that would be met include: improving the ability of people to engage in healthy activities, the provision of greenspace and leisure facilities, maintaining air, soil and water quality as well as protecting and enhancing sites designated for their nature conservation interest.

Do-Nothing or Business as Usual Scenario

- 4.32 Removing these two allocations is unlikely to have a significant effect because Robinswood Hill, as the name suggests, does not lend itself to development. Development pressure in this location is therefore unlikely to increase significantly although there may be some pressure on the fringe areas of the hill where new built development is more feasible and practical.

Comment/Suggested Changes

- 4.33 None.

5. OPEN SPACE & RECREATION

Public Open Space

- 5.1 Access to publicly accessible open space is an important part of people's quality of life. Unfortunately Gloucester has a shortfall of defined public open space at just 2.19 hectares per 1,000 people compared to the national playing fields association recommended standard of 2.4 hectares per 1,000.
- 5.2 Public open space can be formal or informal. It also includes allotment gardens – a specialist form of public open space geared towards the cultivation of plants and vegetables.

The Options

- 5.3 Essentially three options are put forward. Option 1 is to maintain the current public open space designations as set out in the Second Deposit Draft Local Plan (including allotments). Option 2 would be an increase in the number of areas delineated as public open space whilst Option 3 is to remove the current open space designations under a 'do-nothing' scenario.

Overall Findings

- 5.4 Options 1 and 2 score well in sustainability terms. Both would fulfil a number of sustainable objectives including in particular the provision of leisure facilities and green spaces, improving health and people's ability to engage in healthy activities, reducing the need to travel (by having a network of open spaces). Indirect benefits may include community cohesion, improving the quality of where people live and maintaining air quality.
- 5.5 Option 2 which would see the amount of public open space increased, obviously scores higher, although appropriate sites would need to be identified through the LDF process. There may however be some dis-benefits associated with the designation of additional open space in that other forms of development may not come forward as a result and therefore be able to fulfil other objectives such as the need to provide access to employment or housing.

Do-Nothing or Business as Usual Scenario

- 5.6 Removing the current open space designations (including allotments) is likely to lead to increased pressure for other forms of development on a number of sites. In a compact urban area such as Gloucester, the pressure for development is significant and removing these designations may lead to the loss of areas of publicly accessible open space, contrary to a number of sustainable objectives.

Comment/Suggested Changes

- 5.7 The designation of additional publicly accessible open space will yield greater sustainability benefits although suitable sites will need to be found and the benefits associated with other uses also carefully weighed up.

Rowing Club Facility

- 5.8 The Second Deposit Draft Local Plan (2002) identifies a site at Netheridge for a possible new rowing club. The consultation paper seeks views on whether the current site should continue to be allocated for a rowing club or whether there are any other locations which might be more suitable.

The Options

- 5.9 Essentially three options are put forward. Option 1 is to maintain the current rowing club allocation at Netheridge. Option 2 is to identify a new site – although no alternatives are suggested. Option 3 is to delete the current allocation under a do-nothing or ‘business as usual’ scenario.

Overall Findings

- 5.10 Options 1 and 2 which both would lead to the provision of a new rowing club score reasonably well in sustainability terms in that it would improve people’s ability to engage in healthy activities and would provide additional leisure facilities. As a focus for activity there may also be some benefits in terms of improved community cohesion. The full benefits of an alternative site (Option 2) cannot however be ascertained at this stage.
- 5.11 Potential conflict exists with any new site located in the floodplain. Suitable mitigation would be needed to ensure that a new club would not cause or exacerbate the risk from flooding.
- 5.12 The construction of a new facility will also have some negative impacts in terms of the use of raw materials (during construction for example) although these are likely to be negligible.

Do-Nothing or Business as Usual Scenario

- 5.13 The ‘do-nothing’ implications of excluding this allocation are relatively insignificant. Gloucester already has a rowing club, which offers the ability for people to engage in healthy activity.
- 5.14 Clearly however the provision of a new facility would improve the attraction of the club to new participants, which may lead to an increase in the number of people getting involved. Re-location would also free up the existing site for potential redevelopment in line with the Government’s objective of making the most efficient use of land.

Comment/Suggested Changes

5.15 None.

6. HOUSING

- 6.1 The consultation document sets out a number of potential housing allocations. Three of these are carried forward from the Deposit Draft Local Plan (2002) and six of them are new sites identified through urban capacity work and other research.

Land at the Hospital, Great Western Road

- 6.2 Land at the Royal Gloucester Hospital is allocated for the development of up to 80 dwellings. This site was allocated in the Deposit Draft Local Plan (2002).

The Options

- 6.3 Option 1 is to retain this housing allocation under the LDF. Option 2 is to delete this allocation under a 'do-nothing' scenario.

Overall Findings

- 6.4 In sustainability terms, the allocation of this site for housing under Option 1 performs well.
- 6.5 The site comprises previously developed land in a relatively central location. Particular objectives that would be met by having housing on this site include: making the most efficient use of land and buildings, encouraging development of previously developed land, improving access to essential services, reducing the desire/need to travel by car, ensuring access to safe, affordable housing and reducing homelessness.
- 6.6 Clearly the construction of additional dwellings will have some potential dis-benefits in terms of the consumption of raw materials, the generation of waste and water consumption. These impacts are likely to be felt both in the short and long-term, although would not be significant given the scale of potential development.

Do-Nothing or Business as Usual Scenario

- 6.7 Under a do-nothing scenario, although the site may come forward on a speculative basis, this cannot be guaranteed. This may result in a missed opportunity to create a new residential development in a sustainable, accessible central location.

Comment/Suggested Changes

- 6.8 None.

Bus Depot, London Road

- 6.9 Land at the bus depot on London Road is allocated for the development of 35 dwellings.

The Options

- 6.10 Option 1 is to retain this allocation under the LDF. Option 2 is to delete the allocation under a 'do-nothing' or business as usual scenario.

Overall Findings

- 6.11 In sustainability terms, the proposal performs as well as land at the hospital, Great Western Road, referred to above. The same comments therefore apply.

Do-Nothing or Business as Usual Scenario

- 6.12 See comments above.

Comment/Suggested Changes

- 6.13 None.

Part of Oil Storage Depot, Hempsted Lane

- 6.14 Part of the former oil storage depot on Hempsted Lane is allocated in the Draft Deposit Local Plan for housing (up to 30 dwellings).

The Options

- 6.15 Option 1 is to retain this allocation. Option 2 is to delete this allocation under a do-nothing or 'business as usual' scenario.

Overall Findings

- 6.16 The allocation of this site performs reasonably well in sustainability terms. The part of the site that has been allocated for development comprises previously developed land (note: the rest of the site has blended into the landscape to become greenfield). The allocation would also provide additional housing to help ensure access to safe and affordable housing.

- 6.17 In terms of accessibility, the site is relatively well located in respect of local services, facilities and employment opportunities. It is also adjacent to a designated cycle route.

Do-Nothing or Business as Usual Scenario

- 6.18 Deleting the allocation may lead to speculative development pressure for housing either in part or perhaps on the whole of the site. The impact of developing the whole of this site in sustainability terms is likely to be much more significant and potentially harmful in landscape terms particularly.

Comment/Suggested Changes

6.19 None.

Land at Frogcastle Farm, Sandhurst Lane

6.20 The Issues and Options paper sets out a number of potential new housing allocations including three 'greenfield' sites. One of these, land at Frogcastle Farm, has previously been allocated for housing but was dropped because there were enough brownfield sites available in the Central Area of Gloucester to meet the demand for housing at that time.

The Options

6.21 Essentially three options are put forward. Option 1 is to allocate the site for housing. Option 2 is to allocate the site for housing on a phased basis so that it is only allowed to come forward once more sustainable, brownfield opportunities have been used up. Option 3 is to not allocate the site under a do-nothing scenario.

Overall Findings

6.22 Although this is a Greenfield site, it actually performs relatively well in sustainability terms. The location of the site means that it is a reasonably short distance from the City Centre. This is likely to reduce the need/desire to travel by car.

6.23 The size of the site (and thus the number of potential houses) also provides the opportunity to secure a decent proportion of affordable housing to help meet the needs of those unable to access open market housing.

6.24 Other objectives that could be met through the allocation of this site for housing would include improving access to essential services and employment opportunities and reducing traffic congestion.

6.25 Option 2, which would see the site come forward for housing but only in the longer term, scores marginally higher because it would encourage the re-use of previously developed land and buildings in preference to greenfield sites (until these opportunities have been used up).

6.26 The nature of the site means that some potential conflict exists (under either option) in terms of the potential for exacerbated risk of flooding and the protection and enhancement of sites that are designated for their nature conservation importance. Both of these issues would need to be robustly addressed if this site were to be taken forward.

Do-Nothing or Business as Usual Scenario

- 6.27 The do-nothing implications of excluding this potential allocation are difficult to predict. The site could be promoted for speculative residential development but it could also remain in its current use.
- 6.28 Speculative housing development may be less satisfactory than if the site were to be allocated. There would also be no opportunity to ensure that development is phased so that it only comes forward after more centrally located brownfield opportunities have been used up.

Comment/Suggested Changes

- 6.29 None.

Land South of Grange Road

- 6.30 The second 'greenfield' site flagged up for discussion as a potential housing site is land to the south of Grange Road in the south of the City.

The Options

- 6.31 Essentially three options are put forward. Option 1 is to allocate the site for housing. Option 2 is to allocate the site for housing on a phased basis so that it is only allowed to come forward once more sustainable, brownfield opportunities have been used up. Option 3 is to not allocate the site under a do-nothing scenario.

Overall Findings

- 6.32 Although this is a greenfield site and is more remote than land at Frogcastle Farm discussed above, it performs relatively well in sustainability terms. The site is close to several local centres offering a range of local shopping and other services.
- 6.33 The provision of additional housing on this site would also attract a proportion of affordable housing in line with sustainable objectives.
- 6.34 Potential conflict exists with a number of objectives including the protection of natural and semi-natural habitats, encouraging development on previously developed land and reducing the consumption of raw materials.
- 6.35 The site is also relatively remote from potential employment opportunities which may lead to a reliance on the private car. There are no cycle routes in the immediate vicinity.
- 6.36 Option 2 scores similarly, although marginally higher because it would encourage previously developed land to come forward prior to this site being released under a phased approach.

Do-Nothing or Business as Usual Scenario

- 6.37 The 'do-nothing' implications of excluding this site as a housing allocation are relatively insignificant. Allocating the site does however put the Council in a better position to negotiate a high quality development with appropriate provision for open space and affordable housing etc.
- 6.38 If the site didn't come forward, there would be a certain amount of missed opportunity in terms of providing access for people to safe and affordable housing. There would however be some benefits in terms of retaining natural and semi-natural habitats.

Comment/Suggested Changes

- 6.39 The peripheral location of this site creates the risk that there will be a reliance on the private car to travel to and from the site.

Land Between the A38 and Bristol Road

- 6.40 The third 'greenfield' site discussed in the consultation paper is the land to the west of Waterwells Business Park known as 'Mayos' Land. The site adjoins an area of existing housing to the north and west.

The Options

- 6.41 Essentially three options are put forward. Option 1 is to allocate the site for residential development. Option 2 is to allocate the site for residential development as part of a more comprehensive housing development including land to the south, which lies in Stroud District. Option 3 is to not allocate the site under a 'do-nothing' scenario.

Overall Findings

- 6.42 Options 1 and 2 both score relatively well in sustainability terms. Potential conflict exists in terms of the use of greenfield land, the consumption of raw materials, waste generation and the protection of natural and semi-natural habitats. Option 2 scores marginally worse in this regard because it would involve the loss of more greenfield land and the construction of more dwellings (and thus consumption of raw materials and water).
- 6.43 Potential benefits include the provision of additional housing to meet people's needs (including affordable housing) and ensuring access to employment opportunities (given the proximity of Waterwells and Olympus Park). The site is also relatively well located in respect of Quedgeley District Centre, which offers a range of shops and services. The site is close to a designated cycle route and a number of local bus services thus increasing the opportunity for travel by non-car modes.

Do-Nothing or Business as Usual Scenario

- 6.44 There are no significant implications associated with the 'do-nothing' scenario.

Comment/Suggested Changes

- 6.45 In order to improve the performance of both options it may be appropriate if this site were to be allocated for housing development, to allocate it on a phased basis so that it could only come forward once more centrally located 'brownfield' sites have been exhausted.

Clifton Road Triangle

- 6.46 The Clifton Road Triangle is an, 'island' site wedged between Bristol Road, Stroud Road and Clifton Road. The site comprises previously developed or 'brownfield' land consisting of vacant open space, a vacant bath/tiles outlet and a couple of garages.

The Options

- 6.47 Essentially two options are put forward. Option 1 is to allocate the site for residential development. Option 2 is to not allocate the site under a 'do-nothing' scenario. Views are sought on potential alternative uses or mixes of uses for the site, although no firm options are identified.

Overall Findings

- 6.48 The allocation of this site for housing scores well in sustainability terms. The site comprises previously developed land in an extremely accessible location. The site is within comfortable walking distance of the City Centre where an extensive range of shops and services are available. It is also close to a wide range of employment opportunities not only in the City Centre but also along Bristol Road at Madleaze Industrial Estate and land to the south. It is also close to Gloucester Park and is surrounded by two designated cycle routes.
- 6.49 Particular sustainability objectives that would be met include: making efficient use of land and buildings, ensuring access to essential services, ensuring access to safe, affordable housing, reducing the need/desire to travel by car, reducing homelessness, making access easier for those without a car. Indirect benefits will include improved access to open space and health care facilities. The redevelopment of this site also has the potential to improve the appearance of this site leading to an improvement in the quality of the local environment.
- 6.50 Potential conflict exists in terms of the consumption of raw materials and water as well as the generation of waste although this is likely to be relatively minor given the scale of potential development.
- 6.51 There may also be a small displacement of jobs from the site although again, the impact of this will be relatively minor.

Do-Nothing or Business as Usual Scenario

- 6.52 Although there is a chance that this site could come forward speculatively, not allocating this site for development presents the risk that a sustainable housing opportunity may not come forward. There would be some benefit in terms of retaining job opportunities on site.

Comment/Suggested Changes

- 6.53 A mixed-use scheme involving an appropriate form of employment use such as office would help to offset any jobs that might be displaced as a result of future development. It would however reduce the number of residential units which could be created.

Star 66

- 6.54 The Star 66 building is located on the corner of Frampton Road and Seymour Road and is currently used as a youth centre. The building is located within a predominantly residential area and is very close to Seymour Road Local Centre. It is within walking distance of the City Centre. The site is discussed in the consultation paper as a possible housing site through part conversion to residential.

The Options

- 6.55 Essentially, two options are put forward. Option 1 is to allocate this site in part for housing, ensuring that the community use of the building is retained. Option 2 would be to not allocate this site under a 'do-nothing' scenario.

Overall Findings

- 6.56 Option 1 scores well in sustainability terms. The site is in close proximity to Seymour Road Local Centre, which offers a range of shops and services, it also lies close to a range of employment opportunities along Bristol Road. There are a number of areas of public open space in the vicinity. The site also comprises previously developed land.
- 6.57 Particular sub-objectives that would be met through the allocation of this site for housing include: making the most efficient use of existing buildings, encouraging the re-use of previously developed land and buildings, reducing the need/desire to travel by car, ensuring access to essential services and providing access to housing.
- 6.58 Some potential conflict also exists in terms of the consumption of raw materials and water and the generation of waste although these are likely to be relatively minor given the scale of any potential development.

Do-Nothing or Business as Usual Scenario

- 6.59 The do-nothing implications are relatively insignificant. In positive terms, retention of the existing community use of the building would be secure. There may however be a missed opportunity in terms of the provision of additional housing in a sustainable location.

Norville Site, Tarrington Road

- 6.60 The Norville site is identified as a potential opportunity for housing development. It is located off Tarrington Road in Tredworth and is currently in employment use.

The Options

- 6.61 Essentially two options are put forward. Option 1 is to allocate this site for housing and Option 2 is to do nothing under a business as usual scenario.

Overall Findings

- 6.62 Option 1 scores well in sustainability terms. The site is close to the designated Local Centre on the High Street and is within walking distance of the City Centre. It is also within walking distance of several areas of public open space and a designated cycle route. Particular sustainability objectives that would be met through the allocation of this site for housing include: the re-use of previously developed land and buildings, making efficient use of land and existing buildings as well as the provision of additional housing (including potentially - affordable housing).
- 6.63 Other objectives include ensuring access to essential services and local shopping facilities and reducing the need/desire to travel by car as well as improving access for those without a car. High quality development is also likely to lead to an increase in the quality of the environment locally.
- 6.64 Some potential conflict exists for example the loss of employment, which would reduce the opportunity for people to access jobs in this location and to encourage the growth of small businesses. It may also lead to an increase in car trips as local people are forced to drive further afield to access employment opportunities. There may also be some conflict in terms of the consumption of raw materials and the generation of waste although given the scale of potential development this is unlikely to be significant.

Do-Nothing or Business as Usual Scenario

- 6.65 Under a 'do-nothing' scenario, the existing employment use of the site would be retained which would have positive benefits in terms of providing access to jobs and supporting the growth of small businesses. There may however be a missed opportunity to improve the appearance and quality of the local environment through a high quality re-development of the site as well as the opportunity to provide additional housing in a sustainable location. Mixed-use development of housing and employment may be a more sustainable alternative.

Static Caravan Parks

- 6.66 The Second Deposit Draft Local Plan (2002) identifies four static caravan sites at a number of different locations across the City. The current policy approach is to safeguard these sites from other forms of development.

The Options

- 6.67 Essentially two options are put forward. Option 1 is to retain the current static caravan park allocations as set out in the Second Deposit Draft Local Plan (2002). Option 2 is to do-nothing under a business as usual scenario, in other words to delete the allocations.

Overall Findings

- 6.68 Option 1 scores well in sustainability terms. Particular objectives that would be met include the provision of safe, affordable housing, reducing homelessness, improved community cohesion, reducing the number of unfit homes and encouraging the most efficient use to be made of land.
- 6.69 There are no obvious potential conflicts with any other sustainability objectives.

Do-Nothing or Business as Usual Scenario

- 6.70 Not continuing to allocate these four static caravan sites may put them under increased pressure from other forms of development. Although it is unlikely, this may lead to the loss of this important source of affordable residential accommodation contrary to a number of sustainability objectives.

Comment/Suggested Changes

- 6.71 Static caravans are a type of affordable accommodation and living in them is a way of life of choice to some people. Adequate provision should be made for this type of accommodation, as it is consistent with a number of sustainable objectives including the provision of safe, affordable housing. The possibility of identifying other suitable sites might also be considered.

7. EMPLOYMENT

- 7.1 The consultation document sets out a number of potential employment allocations. Four of these are existing allocations taken from the Second Deposit Draft Local Plan and one new site has been identified.

Existing Allocations

- 7.2 The four existing allocations referred to in the consultation document include the south west bypass site, the IM Group site, north of Naas Lane, Land south of the junction between Eastern Avenue and Barnwood Road and Land to the East of Waterwells.
- 7.3 The South West bypass site is, as its name suggests, located just off the south west bypass between the bypass and the Hempsted recreation ground. The site has a current draft allocation for B1 uses (i.e. office and/or light industrial).
- 7.4 The IM Group site is located to the north of Naas Lane between Waterwells Business Park and the railway line. The site is currently allocated for B8 storage and warehousing on the basis that it is close to the proposed rail freight terminal. If however (as discussed later in this document) the rail freight terminal proposal is not retained, the use of the site may need to be revisited.
- 7.5 Land south of the junction between Eastern Avenue and Barnwood Road is allocated for B1 office or light industrial use. Land to the east of Waterwells is also allocated for B1 office or light industrial use.

The Options

- 7.6 The options put forward for each of these sites are essentially the same and for this reason they are discussed together in this section. Option 1 is to retain the existing draft employment allocation of each site. Option 2 is to do-nothing under a business as usual scenario. The consultation paper mentions the possibility of mixed-use development on land to the east of Waterwells although no firm options are put forward. For this reason, we have only assessed Options 1 and 2 at this stage.

Overall Findings

- 7.7 In general terms each of the sites performs relatively well in sustainability terms. The development of the south west bypass site for employment use would fulfil a number of sustainability objectives including the creation of new and lasting full time jobs in an area where jobs are most needed (i.e. Westgate Ward), encouraging inward and indigenous investment and the growth of small businesses. The site is also extremely accessible and is adjoined by a designated cycle route.

- 7.8 There should be no problem in terms of potential pollution, as B1 uses tend not to be associated with the emission of any pollutants. Some potential conflict exists as the allocation would involve the construction of new buildings. Inevitably therefore there will be some additional use of raw materials and generation of waste.
- 7.9 The two sites east of Waterwells, the IM Group site and land to the east of Waterwells both perform the same in sustainability terms. They both relate well to the existing Waterwells Business Park and therefore have the potential to further stimulate inward and indigenous investment as well as directly provide additional job opportunities.
- 7.10 The IM group comprises previously developed land and whilst land to the east of Waterwells is greenfield in nature, there would be no loss of land with any particular nature conservation or landscape value. Some loss of natural and semi-natural habitat would however inevitably occur.
- 7.11 There will also inevitably be some increase in the consumption of raw materials and water as well as the generation of waste. Depending on how the allocations are implemented there may be opportunities for job-based training schemes.
- 7.12 In terms of the use of the car, there is likely to be an increase in the number of car journeys being made to the area as employees travel to work, however Waterwells is relatively well served by bus services. The implementation of the proposed passenger railway station on land to the south of Naas Lane would further increase the accessibility of the site by non-car modes of transport. This is however dependent on the capacity of the rail network being able to be increased.

Do-Nothing or Business as Usual Scenario

- 7.13 Not allocating these sites means there is less chance they will come forward for employment use. There may also be pressure for other forms of higher value development such as residential. It is important that we provide a balanced mix of housing and employment in the interests of sustainability.
- 7.14 The Council would also be less able to ensure the right type of employment development takes place, i.e. what is suitable for the site and what is most needed in terms of the local economy.

Comment/Suggested Changes

- 7.15 In order to improve the performance of the south-west bypass site, the allocation could specify the need for smaller units in order to meet the needs of small, start-up local businesses.
- 7.16 In light of the possible deletion of the rail freight terminal proposal on land at RAF Quedgeley, it may be appropriate to reconsider the B8 allocation of the IM Group site and to incorporate other employment uses in this location.

- 7.17 Development of land to the east of Waterwells will need to take close account of the amenity of existing occupants who live in the area.

Potential New Employment Allocations

- 7.18 The consultation paper identifies one potential new employment allocation on land adjacent to the Walls Factory out at Barnwood (note: other employment opportunities are discussed in the mixed-use development section below). The land is not currently used, but is believed to have been previously held for potential expansion of the Walls Factory.

The Options

- 7.19 Essentially two options are put forward, Option 1 is to allocate the site for B1 (office or light industrial) and possibly B2 (general industrial) use on part of the site. Option 2 is to do-nothing under a business as usual scenario, in other words, to not allocate the site for employment use.

Overall Findings

- 7.20 In sustainability terms Option 1, which is the allocation of this site for B1 and possibly B2 use on part, generates a mixed response. Development of the site for employment use would fulfil a number of objectives including the creation of job opportunities, encouraging inward investment and potentially increasing access to job-based training opportunities.
- 7.21 Potential conflict exists however with a number of other sustainability objectives. The site is not that accessible by non-car modes of transport. It is segregated from the residential area of Elmbridge to the north by the railway line and the residential area of Barnwood to the south, by the Barnwood Bypass and the commercial area around Sainsburys. Although there is a footbridge across the bypass and a number of designated cycle routes in the area, it is possible that trips to the site would be mainly by car.
- 7.22 Development of the site would therefore need to ensure that the accessibility of the site by non-car modes could be improved e.g. through appropriate contributions to improved public transport or pedestrian and cycle linkages.
- 7.23 The site has no specific nature conservation or landscape value although inevitably there may be some loss of semi-natural habitat. There would also be an increase in the consumption of raw materials and the generation of waste.
- 7.24 Development of part of the site for general industrial use also has more potential to cause possible problems in terms of pollution than B1 office or light industrial use although legislation should ensure that this isn't a problem.

Do-Nothing or Business as Usual Scenario

- 7.25 There are no significant implications associated with a do-nothing option. The site is likely to remain in its present state. There may be some 'opportunity cost' in terms of a missed opportunity to provide additional jobs.

Comment/Suggested Changes

- 7.26 Allocating the site for small units, perhaps on part of the site, would offer support and encouragement to small businesses in the area.
- 7.27 Significant investment is likely to be necessary in order to increase the accessibility of the site by non-car modes of transport.

8. MIXED-USE DEVELOPMENT

- 8.1 The consultation document sets out three potential mixed-use allocations. Land at the junction of the Barnwood Road and bypass was allocated in the Second Deposit Draft Local Plan (2002) and the former B&Q site and Morelands Trading Estate are identified as possible new allocations. Each of these sites is discussed in more detail below.

Land at the Junction of the Barnwood Road and Bypass

- 8.2 This site was originally allocated for B1 office and/or light industrial use in the Deposit Draft Local Plan (2001). At the Second Deposit Stage in 2002, the site was allocated instead for mixed-use development of mainly B1 employment with limited housing and a new local shopping centre.
- 8.3 The consultation paper suggests that this allocation, which has not yet been implemented, should be carried forward into the LDF.

The Options

- 8.4 Essentially two options are proposed, Option 1 being to maintain the existing mixed-use allocation of the site, Option 2 being to do-nothing under a business as usual scenario in other words, to delete the draft allocation.
- 8.5 Views are sought on the mix of uses on the site and the potential for other uses in this location, although no firm options are set out.

Overall Findings

- 8.6 The allocation of this site for mixed-use development of employment with some housing (Option 1) performs well in sustainability terms. Mixed-use development itself offers a number of benefits including the possibility of linked-trips (i.e. one trip to a single site to achieve several tasks). In this case it would be possible for someone to live next to where they work (and thus reduce the need to travel) and to also access local shopping facilities without the need to travel.
- 8.7 The site is well related to the residential area of Barnwood to the south and there is a designated cycle route running past the site. Bus services in this location are good. For potential new residents, there are a number of schools within walking distance and several areas of public open space.
- 8.8 Redevelopment of this site would also involve the re-use of previously developed land and would offer the opportunity through a well-designed scheme, to improve the appearance and character of the area.
- 8.9 There may be scope for some affordable housing provision depending on the number of residential units coming forward.

Do-Nothing or Business as Usual Scenario

- 8.10 The site is likely to come forward even if not allocated. The risk is that it doesn't and a decent development opportunity is wasted. Alternatively, a scheme may come forward which doesn't provide for the right type or mix of uses for this location. There may be a tendency towards a greater proportion of housing at the expense of employment, which although may have some benefits such as increased scope for the provision of affordable housing, will reduce the opportunity to provide additional jobs in this location.

Comment/Suggested Changes

- 8.11 There needs to be a balance between the provision of housing and employment and the allocation of the site for mixed-use development is most likely to achieve the right balance.

Former B&Q Premises, Barton Street

- 8.12 B&Q have re-located to new premises at St. Oswald's Park. Their former site on the corner of Bruton Way and Barton Street is therefore vacant.
- 8.13 The consultation paper identifies the site as a possible mixed-use development opportunity.

The Options

- 8.14 Essentially three options are put forward. Option 1 is to allocate the site for housing and employment, Option 2 is to incorporate an element of public car parking into a mixed-use scheme and Option 3 is to retain the existing retail use under a do-nothing or business as usual scenario.

Overall Findings

- 8.15 Option 1, which is to allocate the site for housing and employment, scores well in sustainability terms. Particular objectives that would be met include: making the most efficient use of land, re-using previously developed land and buildings, the creation of additional job opportunities and possibly encouraging the growth of small businesses.
- 8.16 The site is also accessible by a choice of modes of transport being within walking distance of the bus station and railway station. Residents would be able to walk from this site either to the shops and services in Barton Street Local Centre or to the City Centre itself.
- 8.17 Depending on the number of residential units, there may also be the possibility to secure a proportion of affordable housing. Redevelopment of the site may also help to strengthen the vitality and viability of Barton Street Local Centre, which has declined in recent years although it should be noted that the core of the Local Centre is about 130 metres away, so this may not be the case.

- 8.18 Option 2 would involve a mix of uses based on the above but also incorporating an element of public car parking.
- 8.19 In sustainability terms, the provision of public car parking does not perform too well because it has the potential to encourage car-borne travel although it would not directly increase the number of cars on the highway network. In addition, any parking would probably need to be multi-storey in order to make the most efficient use of the site.
- 8.20 In positive terms, the provision of parking in this location has the potential to act as a 'park and walk' facility. The effect would be to reduce the number of cars having to travel right into the City Centre, which is likely to have a positive effect in terms of reducing traffic congestion. Existing car parks in the centre might also be able to be put to other uses.
- 8.21 Parking here would also improve access to the leisure facilities available at GL1 leisure centre, which would have a positive effect in terms of improving the ability of people to engage in healthy activities.

Do-Nothing or Business as Usual Scenario

- 8.22 The 'do-nothing' implications are difficult to establish with any degree of certainty. It is likely that there will be pressure for continued retail use of the site and possibly an increase in the amount of floorspace and a broadening of the scope of goods that are allowed to be sold from the site (which is currently restricted to DIY type goods).
- 8.23 The development of additional retail floorspace in this location has the potential to compete with more centrally located sites, which could lead to a decline in the health of the Primary Shopping Area.
- 8.24 There is also the possibility that in not seeking to allocate this site for redevelopment, it could remain vacant for some time, which would not be in the interests of improving the overall environmental quality and the character of the area.

Comment/Suggested Changes

- 8.25 None.

Morelands Trading Estate

- 8.26 Morelands Trading Estate is located on Bristol Road. It is currently in employment use but is occupied only in part. The consultation paper identifies the site as a possible opportunity for redevelopment to a mix of housing and employment.

The Options

- 8.27 Essentially two options are put forward. Option 1 is to redevelop the site for housing and employment. Option 2 is to retain the existing employment use under a 'do-nothing' or business as usual scenario.

Overall Findings

- 8.28 Option 1 for mixed-use housing and employment scores well in sustainability terms. The site comprises previously developed land, it is within comfortable walking distance of the City Centre and Seymour Road Local Centre and is adjoined by a number of designated cycle routes.
- 8.29 The provision of new employment uses would provide opportunities for meaningful employment close to a number of areas of greatest need. Depending on the type of employment uses that were to come forward, there may be opportunities for supporting and accommodating small local businesses. It is understood that the site is home to a number of small companies at present.
- 8.30 The provision of new housing offers the opportunity to provide safe and affordable housing in this location. Its proximity to the City Centre and bus services along Bristol Road mean that residents and employees would not be reliant on the private car to travel to and from the site.
- 8.31 A well-designed scheme also has the potential to improve the quality of the environment along Bristol Road by enhancing the appearance of this landmark building.
- 8.32 Residents of the site would have access to a wide range of local shops and essential services. The site is also only part occupied at present and its redevelopment for a more intensive use would effectively reduce the amount of underused land in this area.
- 8.33 There are no obvious conflicts with other sustainability objectives.

Do-Nothing or Business as Usual Scenario

- 8.34 Although a speculative proposal for this site may come forward, there can be no guarantee that this will happen. Allocating this site for mixed-use development through the LDF is more likely to stimulate interest in this site.
- 8.35 In the absence of any allocation, the site may remain in its present employment use which clearly would have benefits in terms of retaining job opportunities however the site is relatively inefficiently used being only part-occupied.

Comment/Suggested Changes

8.36 None.

9. TRANSPORT

Cycle Routes

- 9.1 Under the Deposit Draft Local Plan, we have identified a number of designated cycle routes which will be safeguarded.

The Options

- 9.2 Essentially three options are proposed. Option 1 is to maintain the current cycle route designations as set out in the Draft Local Plan. Option 2 is to identify additional cycle routes and Option 3 is to remove the currently defined cycle routes shown in the draft Local Plan and to make no attempt to identify any additional routes.

Overall Findings

- 9.3 Options 1 and 2 score extremely well in sustainability terms. Particular sub-objectives that would be met include: improved access to essential services, making access easier for those without a car, providing additional leisure facilities, improving health, reducing the need/desire to travel by car, ensuring alternatives to the car are available, reducing traffic congestion, and reducing contributions to climate change.
- 9.4 Option 2 scores higher because it would increase the number of cycle routes available and thus the number of benefits outlined above. Appropriate locations for new cycle routes would however need to be identified through the LDF process.

Do-Nothing or Business as Usual Scenario

- 9.5 The do-nothing implications are not significant although removing the designated cycle routes would clearly place the Council in a weaker position to resist development that might prejudice their operation or attractiveness. Planned new routes are also less likely to be implemented.

Comment/Suggested Changes

- 9.6 The provision of additional cycle routes should be investigated in appropriate locations such as those parts of the City which are presently less well served and/or where car ownership is lower than average.

New Railway Station and Freight Terminal

- 9.7 The Second Deposit Draft Local Plan (2002) identifies land for a new passenger railway station on land to the south of Naas Lane and a new rail freight terminal at RAF Quedgeley.

The Options

- 9.8 Essentially 5 options are put forward. Option 1 is to retain the passenger railway station allocation. Option 2 is to delete this allocation. Option 3 is to retain the rail freight allocation. Option 4 is to delete this allocation. Option 5 is the 'do-nothing' option whereby neither site would be allocated (effectively a combination of Options 2 and 4).

Overall Findings

- 9.9 Option 1, which is to retain the passenger railway station allocated on land south of Naas Lane, scores well in sustainability terms. Particular objectives that would be met include improved access to essential services, reducing the need to travel by car, ensuring alternatives to the car are available and reducing traffic congestion and pollution. There may also be some indirect benefits such as encouraging inward investment as well as the creation of additional job opportunities particularly during the construction phase.
- 9.10 Option 2, which is to delete this allocation, would effectively reduce the opportunity to achieve the sustainability benefits outlined above. There may be some positive benefits in that not constructing a new station in this location would provide the opportunity for other development such as housing or additional employment (which would have associated benefits in sustainability terms).
- 9.11 Option 3, which is to retain the rail freight terminal allocation at RAF Quedgeley, would have a direct positive impact in terms of increasing the proportion of freight carried by rail. This in turn would have a positive impact in terms of reducing congestion (by taking additional HGVs off the road) and reducing contributions to climate change.
- 9.12 Option 4, which is to delete the rail freight allocation, would effectively reduce the opportunity to increase the proportion of freight presently carried by rail. This in turn would reduce the opportunity to achieve a reduction in congestion.

Do-Nothing or Business as Usual Scenario

- 9.13 See assessment of Options 2 and 4 above.

Comment/Suggested Changes

- 9.14 Retention of both allocations scores well in sustainability terms although indications suggest that the rail freight terminal proposal is unlikely to happen due to the prohibitive costs associated with implementation.

Bus Priority

- 9.15 Bus priority means introducing measures to make using the bus quicker than using a car. This should encourage people to leave their cars at home in favour of using public transport.

The Options

- 9.16 Essentially three options are put forward. Option 1 is to maintain the current bus priority routes as set out in the Deposit Draft Local Plan (2002). Option 2 is to extend these routes into other areas where appropriate. Option 3 would be to remove the current bus priority routes set out in the Local Plan under a 'do-nothing' scenario.

Overall Findings

- 9.17 Options 1 and 2 both score well in sustainability terms because they are designed to achieve a shift from people using their cars to using buses instead. Particular benefits therefore include reduced congestion, reducing the need/desire to travel by car, improving access to essential services, reducing contributions to climate change and ensuring that alternatives to the car are available for essential journeys.

Do-Nothing or Business as Usual Scenario

- 9.18 Removing the designated bus priority routes set out in the Deposit Draft Local Plan will significantly reduce the possibility of bus priority measures being introduced in the future. This will mean less opportunity to reduce congestion, encourage modal shift and to achieve the other benefits outlined above.

Comment/Suggested Changes

- 9.19 The performance of the policy/designation could be improved by ensuring that areas of congestion are tackled in particular.

10. FLOODING

- 10.1 The Second Deposit Draft Local Plan identifies the extent of the River Severn Floodplain. This is based on the extent of a large flood event which occurred in 1947.

The Options

- 10.2 No alternative options are put forward. The consultation paper simply sets out a commitment to identify the precise extent of the current River Severn Floodplain through consultation with the Environment Agency.

Overall Findings

- 10.3 The designation of a defined floodplain will help to ensure that the risk of flooding to people and places is kept to a minimum. It is largely unrelated to the majority of sustainable objectives.

Do-Nothing or Business as Usual Scenario

- 10.4 Not defining the extent of the floodplain is not considered to be a realistic option.

Comment/Suggested Changes

- 10.5 None.

11. DISTRICT AND LOCAL CENTRES

- 11.1 We have identified a number of District and Local Centres across the City in order to provide for local shopping needs. There are two District Centres and ten Local Centres. They are important because they provide facilities for those who are unable to travel into the City Centre.

The Options

- 11.2 Essentially three options are put forward. Option 1 is to maintain the current District and Local Centre designations. Option 2 is to maintain these designations but to also identify a new Local or District Centre or centres. Option 3 is to delete the District and Local Centre allocations under a 'do-nothing' scenario.

Overall Findings

- 11.3 Options 1 and 2 both score well in sustainability terms. Particular objectives that would be met include: supporting and encouraging the growth of small businesses, helping people to access essential basic services, making access easier for those without a car, helping disabled people access services more easily, reducing the need/desire to travel by car, reducing poverty (by increasing access to shops and services) and maintaining and enhancing the vitality and viability of designated centres.
- 11.4 Option 2 scores higher because it has the potential to address any current shortfalls in local shopping provision in certain parts of the City. Appropriate new sites would however have to be identified through the LDF process and assembled.

Do-Nothing or Business as Usual Scenario

- 11.5 The do-nothing implications of excluding the District and Local Centre allocations are relatively insignificant. We already have a network of local shops and services and these would not disappear overnight. They may however come under pressure from other forms of development, which could weaken them and ultimately lead to the loss of the centre.
- 11.6 In delineating local and district centres we can steer appropriate forms of development towards them and resist inappropriate forms of development. This would be harder to achieve were clear boundaries not identified.

Comment/Suggested Changes

- 11.7 The possibility of identifying new local or district centres should be fully explored in the interests of further improving the ability of all residents to access shops and services easily.

12. COMMUNITY PROVISION

- 12.1 Community provision refers to the provision of community facilities such as health centres, surgeries, schools and colleges, community centres, meeting halls and so on.
- 12.2 Such facilities tend to be provided by a variety of agencies in the public, private and voluntary sectors. Gloucestershire County Council has a statutory responsibility to ensure the provision of community services including education, social services, youth services, libraries and the fire service. The City Council can identify suitable sites and seek to work in partnership with these organisations to bring proposals forward.

The Options

- 12.3 The Second Deposit Draft Local Plan (2002) identifies a number of potential new community facilities.

Land at Lobleys Drive

- 12.4 As part of the comprehensive Abbeymead development, land was reserved for a community centre off Mead Road to serve the residents of the area. However, after consultation with the local community it was decided that a better site would be the area of land at Lobleys Drive. This was duly allocated for a new community building in the Deposit Draft Local Plan (2001).

The Options

- 12.5 Essentially two options are put forward. Option 1 is to retain this allocation and carry it forward under the LDF. Option 2 is to delete the allocation under a 'do-nothing' or business as usual scenario.

Overall Findings

- 12.6 Option 1 scores well in sustainability terms. This is considered to be a good location for a new community building, being well-located in the heart of a predominantly residential area. Particular objectives that would be met include improving the ability of people to access essential services, improving people's ability to engage in healthy activities (assuming the facility would be used for aerobics and similar) encouraging community engagement in community activities, improving community cohesion and improving the quality of where people live.
- 12.7 It may also reduce the desire/need to travel by car to other facilities that are further afield.
- 12.8 Some potential conflict however exists as the proposal would involve the construction of a new building. There may be conflict therefore with objectives relating to the need to reduce the consumption of natural resources and reduce water consumption, although this will be small-scale.

Do-Nothing or Business as Usual Scenario

- 12.9 Without this allocation, there is less chance that such a facility will come forward in this location. This may mean that residents are forced to travel further potentially leading to unnecessary car journeys. There will also be less opportunity for people to engage in community based activities including healthy activities and thus opportunities for enhanced community cohesion may therefore be lost.

Comment/Suggested Changes

- 12.10 None.

Land off Abbeymead Avenue

- 12.11 The County Council has reserved a site for a new library and police station on land off Abbeymead Avenue at Abbeymead to meet the needs of the area.

The Options

- 12.12 Essentially two options are put forward. Option 1 is to retain this allocation and carry it forward under the LDF. Option 2 is to delete the allocation under a 'do-nothing' or business as usual scenario.

Overall Findings

- 12.13 The provision of a new police station on this site is largely unrelated to the majority of sub-objectives set out in the Sustainability Appraisal Framework although there may be some positive benefits in terms of reducing crime and the fear of crime and thereby improving the quality of where people live. Again, the construction of a new building will have some dis-benefits in terms of the consumption of energy and raw materials although this is likely to be relatively minor.
- 12.14 The provision of a new library on this site will improve people's ability to access learning, skills and knowledge and may help to improve educational attainment. It will also reduce the need to travel to other facilities in the wider area thus potentially reducing car use.

Do-Nothing or Business as Usual Scenario

- 12.15 The do-nothing implications of excluding the proposed police station are not too significant although clearly there is a perceived need for a new station in this location and if it is not provided, there will be less opportunity to positively influence a reduction in crime and the fear of crime in the east of the City.
- 12.16 Deleting the library allocation will mean less opportunity for people in this area to access learning, skills and knowledge and will mean that unnecessary car journeys take place as people are forced to travel further afield to reach the nearest library facility.

Comment/Suggested Changes

12.17 None.

Land off the Wheatridge East

12.18 The County Council has reserved a site at the Wheatridge (East) for a new Primary School. This site is allocated in the Second Deposit Draft Local Plan (2002).

The Options

12.19 Two options are put forward. Option 1 is to retain the current allocation. Option 2 is to delete it under a 'do-nothing' or business as usual scenario.

Overall Findings

12.20 Option 1 scores well in sustainability terms. The provision of a new primary school in this location would be consistent with a number of objectives including: improving access to essential services, making access easier for those without a car, improving access to learning, training, skills and knowledge, improving the skills of young people, improving community cohesion and reducing the need/desire to travel by car.

12.21 Potential conflict exists with certain objectives including the use of raw materials, waste generation, energy consumption and water consumption. These effects are however unlikely to be significant.

Do-Nothing or Business as Usual Scenario

12.22 Excluding this allocation reduces the likelihood of a new primary school coming forward in this location. There is likely to be pressure from alternative forms of development on the site including for example housing.

12.23 If a school does not come forward on this site, there will be less opportunity to reduce car use and congestion as people are forced to travel further to the nearest school. Implementation of this proposal will however depend on the County Council's school programme.

Comment/Suggested Changes

12.24 None.

Land at Clearwater Drive

12.25 The second site reserved for a new school site is land at Clearwater Drive, Quedgeley. This site is allocated in the Second Deposit Draft Local Plan (2002). The allocation states that if the school does not come forward, the site should be used for public open space.

The Options

- 12.26 Essentially four options are put forward. Option 1 is to retain the current school allocation. Option 2 is for the site to be used as public open space instead. Option 3 is for the site to be used for both housing and public open space and Option 4 is to delete the allocation under a 'do-nothing' scenario.

Overall Findings

- 12.27 Options 1, 2 and 3 score well in sustainability terms, each for different reasons. Option 1, which is to retain the current school allocation, scores well in terms of reducing the need to travel and improving access to learning, skills and knowledge.
- 12.28 Option 2, which is to use the site as public open space instead, scores well in terms of the provision of additional leisure facilities and greenspace, improving people's ability to engage in healthy activities and improving the quality of where people live (note: Quedgeley is deficient in terms of public open space provision).
- 12.29 Option 3, which is to use the site for both housing and public open space, scores well in terms of providing access to housing, the provision of additional leisure facilities and greenspace and in terms of improving people's ability to engage in healthy activities.
- 12.30 Clearly the construction of new dwellings will have some negative impacts in terms of the consumption of energy and raw materials both during and after construction.

Do-Nothing or Business as Usual Scenario

- 12.31 Not allocating this site for any particular purpose may lead to speculative development interest, perhaps for housing. Although new housing in this location would have a number of sustainable benefits, it would also remove an opportunity to provide additional public open space in the Quedgeley area.

Comment/Suggested Changes

- 12.32 None.

13. OTHER ISSUES

Cordon Sanitaire

- 13.1 The Second Deposit Draft Local Plan (2002) identifies a 'cordon sanitaire' around Netheridge Sewage Works. This is essentially a zone within which most forms of development will not be permitted because of the potential problems associated with odour from the works.

The Options

- 13.2 Essentially four options are put forward. Option 1 is to retain the existing cordon sanitaire designation as set out in the Draft Local Plan. Option 2 is to reduce the extent of this designation. Option 3 is to enlarge the designation and Option 4 is to delete it completely under a 'do-nothing' or business as usual scenario.

Overall Findings

- 13.3 The 'cordon sanitaire' designation is largely unrelated to the majority of objectives set out in the sustainability framework. There are however some linkages.
- 13.4 Options 1 and 3, which are to retain or enlarge the current designation score well in terms of reducing sources of pollution (odour) maintaining air quality and improving the quality of where people live.
- 13.5 Option 2, which would see the cordon reduced in size may lead to potential problems where new development occurs in locations that are prone to odour problems.

Do-Nothing or Business as Usual Scenario

- 13.6 The business as usual scenario of excluding this designation is not too significant because the area within the cordon is also designated as floodplain and landscape conservation area, which would also safeguard the area from inappropriate forms of development.
- 13.7 Deletion of this designation may however place the Council in a weaker position to resist development likely to suffer adversely from smell, particularly permanent uses such as housing or employment.

Comment/Suggested Changes

- 13.8 The appraisal suggests that this allocation should at least be retained as currently defined.

Conservation Areas

- 13.9 Section 69 of the Act imposes a duty on local planning authorities to designate as conservation areas any 'areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'. There are now more than 8,000 conservation areas in England.
- 13.10 We have 11 Conservation Areas in Gloucester. Three of these lie outside the 'Central Area' at London Road, Hempsted and Hucclecote Green.

The Options

- 13.11 Three options are put forward. Option 1 is to maintain the current Conservation Area designations at London Road, Hempsted and Hucclecote Green. Option 2 is to identify additional Conservation Areas in appropriate locations. Option 3 is to delete the current Conservation Area designations under a 'do-nothing' scenario.

Overall Findings

- 13.12 Options 1 and 2 score well in sustainability terms although are largely unrelated to the majority of sustainability objectives. Those that would be met include the maintenance and enhancement of historic assets, improving the attraction of Gloucester as a visitor destination and improving the quality of where people live.
- 13.13 There are no notable conflicts with any of the other objectives set out in the SA framework.
- 13.14 Option 2 scores marginally higher although clearly the designation of an additional Conservation Area or Areas would have to be fully justified in terms of the historic or architectural importance of the area.

Do-Nothing or Business as Usual Scenario

- 13.15 Given the legal requirement for the Council to designate conservation areas, this isn't considered to be a realistic option. In hypothetical terms however, deleting these designations may reduce the Council's ability to resist inappropriate forms of development. This may lead to harm being caused to the character of areas of particular architectural or historic importance although other policies will help to some extent to ensure that this doesn't happen. This may lead to a reduction in the quality of where people live and possible harm to historical assets.

Comment/Suggested Changes

- 13.16 The possibility of identifying new Conservation Areas in appropriate locations should be fully investigated through the LDF process.

14. CONCLUSION & NEXT STEPS

- 14.1 The appraisal process has demonstrated that the majority of potential options set out in the consultation paper are consistent with the key objectives of sustainable development.
- 14.2 It has also served to identify where improvements can be made in order to make potential policies and proposals more sustainable.
- 14.3 In nearly all cases, the proposed policy options have been preferable to the do-nothing or business as usual scenario.
- 14.4 The matrix attached at Appendix 1 identifies any potentially significant impacts and their likely duration.
- 14.5 Responses to this appraisal document will be taken into account along with those we receive in response to the Issues and Options consultation papers themselves. These will be reported to Council who will agree a 'Preferred Option' consultation document, which will be published in March/April 2006.

English

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Urdu

اگر آپ کو یہ انگریزی میں سمجھنے میں مشکل پیش آتی ہے تو براہ مہربانی یہاں
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Gujarati

તમોને જો આ ઈંગ્લીશમાં સમજવામાં તકલીફ પડતી હોય તો મહેરબાની
કરીને નીચેની જગ્યાએ સંપર્ક સાધશો :
ટેપિસ્ટ્રી ટ્રાન્સલેશન સર્વિસ,
કોર્પોરેટ પર્સનલ સર્વિસીસ,
હેરબર્ટ વેરહાઉસ, ઇ ડૉક્સ,
ગ્લોસ્ટર, બ્રાયોલ ૧ ૨ઈકીયુ.
ટેલીફોન નંબર : (૦૧૪૫૨) ૩૯૬૯૦૯

Chinese

如果你對明白這些英文有困難的話，請聯絡
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Bengali

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ঠিকানায় যোগাযোগ করুন:
ট্যাপেস্ট্রী ট্রান্সলেশন সার্ভিস
করপোরেট পার্সোনেল সার্ভিসেস
হারবার্ট ওয়ারহাউস, দা ডকস
গ্লোস্টার ডিএল ১ ২ইকিউ
টেলিফোন নম্বর: (০১৪৫২) ৩৯৬৯০৯

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