

Gloucester City Council

Gloucester Local Development Framework



Core Strategy Issues & Options Consultation Sustainability Appraisal



September 2005
Policy, Design & Conservation



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1. INTRODUCTION

- 1.1 This report outlines the findings of a Sustainability Appraisal carried out on the Core Strategy 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 potential option set out in the Core Strategy 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 appraisal 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 Core Strategy are invited until **24th October 2005**.
- 1.6 Comments we receive will be taken into account along with those we have already received and will feed into a Core Strategy ‘Preferred Options’ paper which will be published for a further six-week period of public consultation in January 2006.

2. BACKGROUND

- 2.1 Sustainable development is about ensuring plans policies and proposals have regard for environmental, economic and social well-being. It is an issue that is very much at the top of the Government's policy agenda.
- 2.2 In subjecting each of our planning documents to a Sustainability Appraisal we can ensure that potential policies and proposals are consistent with the fundamental objectives of sustainable development. We can also identify how policies might be revised to make them more 'sustainable'.
- 2.3 On July 28th 2005 the Council approved a Sustainability Appraisal 'Scoping Report' which sets out the approach that the Council will take in appraising each LDF document.
- 2.4 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 policy influences on Gloucester as well as the current baseline state of the City in environmental, social and economic terms. From this assessment, the report draws out the key issues facing Gloucester and translates these into a number of sustainable objectives.
- 2.5 The Full Scoping Report (as well as a non-technical summary) is available to download online at www.gloucester.gov.uk. Hard copies may be viewed and/or purchased from the City Council Offices.
- 2.6 The Scoping Report has directly informed this appraisal document. In particular, the Scoping Report includes within it a Sustainability Appraisal (SA) Framework. This is essentially a matrix of objectives and questions to be applied to each policy/proposal in order to 'score' how well they perform in sustainability terms.
- 2.7 A series of Officer Workshop Sessions were held in August 2005 during which the SA Framework was completed for each potential policy option including a 'do-nothing' or business as usual scenario where the effect of not having a policy or proposal in place was assessed.
- 2.8 A schedule of Core Policies is set out at Appendix A of this report. Completed matrices are set out at Appendix B.

3. CORE STRATEGY OPTIONS

- 3.1 The Core Strategy Paper outlines a range of relevant 'baseline' data for Gloucester. These are key statistics on issues such as population, health, housing, crime, employment, education, transport and so on.
- 3.2 This baseline data is then used to draw out the key issues that currently face, and are likely to face Gloucester in the future.
- 3.3 Some of the key issues identified in the Core Strategy include:
 - Higher than average rates of crime
 - Lack of public open space
 - Lack of affordable housing
 - Poor health of Gloucester residents
 - Poorer than average educational attainment
 - The City's important built and natural heritage
 - Unemployment
 - High levels of deprivation in certain wards
- 3.4 These and other key issues are then translated into a series of strategic objectives including:
 - Encouraging inward investment and economic growth
 - Tackling poverty and inequality
 - Reducing crime and fear of crime
 - Improving the health of Gloucester residents
 - Reducing car use and encourage better use of public transport
 - Ensuring high standards of design in new buildings
 - Improving the health of the City Centre
 - Improving the attraction of Gloucester as a visitor destination
- 3.5 These strategic objectives then feed into a series of potential policy options including most fundamentally a proposed **Spatial Strategy** setting out the main principles for the future growth of Gloucester as a Principal Urban Area (PUA). From this strategy, stems 16 potential **Core Policies** setting out guidance on a range of key topics from affordable housing to retail development.
- 3.6 The Spatial Strategy and each Core Policy Option have been rigorously assessed using the Council's Sustainability Appraisal (SA) Framework.
- 3.7 Completed matrices are set out at Appendix B. Commentary on the key findings is set out in Section 4.0 below.
- 3.8 The Spatial Strategy and Core Policy options are briefly summarized below.

The Spatial Strategy

- 3.9 The most important component of the Core Strategy is the overarching 'Spatial Strategy'. This is intended to represent the main, over-arching policy mechanism through which the key issues and strategic objectives identified earlier in the document will be implemented in practical terms.
- 3.10 Only one Spatial Strategy is put forward. The strategy seeks to maximise Gloucester's opportunities and build on its strengths in order to deliver a sustainable and ongoing urban renaissance.
- 3.11 The key elements of the strategy are:
- Focusing the majority of growth (but not all) into the Central Area of Gloucester
 - Upgrading and enhancing the local and strategic transport network
 - Realizing the full development potential of previously developed land and buildings in order to safeguard Greenfield land
 - Encouraging the most efficient use of land
- 3.12 The Strategy is underpinned by a number of key objectives including:
- The provision of enough housing and employment land to meet forecast needs
 - Reducing the need to travel
 - Encouraging mixed use development in appropriate locations
 - Strengthening the City Centre
 - Ensuring access to essential services for all
 - Securing a good balanced mix of land uses
 - Protecting environmentally sensitive parts of the City from inappropriate development
 - Safeguarding the City's built and natural heritage
- 3.13 So far we have received strong general support for the proposed strategy which seeks to maximise development opportunities in the Central Area of Gloucester. Some concerns have been expressed however that such a strategy will preclude development opportunities elsewhere in the Gloucester.
- 3.14 This is not the case. The strategy will focus primarily, but not exclusively on growth within the Central Area. Other development opportunities in more peripheral locations will be supported provided they are consistent with other relevant aspects of the Spatial Strategy such as reducing the need to travel and ensuring access to essential services.
- 3.15 It is also important to note that the majority of the underlying principles of the strategy relate to Gloucester as a whole and not just the Central Area.
- 3.16 Commentary on our appraisal of the proposed Spatial Strategy is set out in Section 4.0. We have tested the sustainability implications of the Spatial Strategy as well as the implications of the strategy not being put in place (i.e. a business as usual or do-nothing scenario).

Core Policies

- 3.17 The Core Strategy consultation paper includes 16 potential Core Policies designed to help implement the proposed Spatial Strategy and address the identified key issues and strategic objectives. A schedule of these Core Policies is attached at Appendix A.
- 3.18 Under each policy we have set out a number of potential options. For some policies only two options are put forward whilst for others up to four options are identified. This is because certain topics such as housing or employment provision lend themselves to a much broader range of possible different approaches.
- 3.19 We have appraised each of the options set out under each of the Core Policies. We have also appraised the implications of each policy not being put in place (i.e. a business as usual or do-nothing scenario). For example what are the sustainability implications of not including a policy that is designed to protect the City Centre from out of town shopping? Will this lead to out of centre proposals that compete aggressively with the City Centre?

Please note: Only when a particular option scores differently from the others has this been identified in the completed matrices set out at Appendix B. In other words, unless indicated to the contrary, it is to be assumed that each option has scored identically when compared to each sustainability sub-objective. The reasons for any differences are also set out in the completed matrices.

4. APPRAISAL OF OPTIONS

- 4.1 The full results of the Sustainability Appraisal of Core Strategy Options are set out in a series of matrices attached at Appendix B.
- 4.2 The matrix has been designed to ensure each option is subject to a rigorous assessment procedure that takes into account the requirements of the EC Directive on Strategic Environmental Assessment (SEA).
- 4.3 The matrix therefore looks at the likelihood of any impact, the likely timescale, whether the effect will be temporary or permanent, significant and/or cumulative and whether the impact will be localised, citywide or even cross-boundary. The impact of each option has been scored on the following basis:

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

- 4.4 Commentary on the main findings of the appraisal is set out below.

The Spatial Strategy

- 4.5 The Spatial Strategy has been summarised in Section 3.0 above and focuses on the regeneration of Central Gloucester. This is considered to be the only feasible option for future growth in Gloucester. No alternative options have been put forward during the consultation process to date. We have appraised the proposed strategy as well as the implications of not putting the strategy in place i.e. a business as usual scenario. The results are summarised below and are set out in full at Appendix B.

Overall Findings

- 4.6 The appraisal of the proposed Spatial Strategy demonstrates that it is wholly consistent with the main objectives of sustainable development.
- 4.7 The emphasis placed by the strategy on protecting the more environmentally sensitive parts of the City and safeguarding Gloucester's historic fabric/heritage ensures that it scores well in terms of the protection of vulnerable assets.
- 4.8 Similarly the emphasis on making the most efficient use of previously developed land and buildings ensures that the strategy is consistent with the sustainability objective of 'minimising the consumption of natural resources and production of waste' and making the most efficient use of previously developed land and buildings.
- 4.9 Concentrating the majority of future growth within the Central Area is consistent with a number of objectives including in particular the protection of vulnerable assets, the re-use of previously developed land and buildings, reducing the need to travel, encouraging walking and cycling, strengthening the vitality and viability (i.e. health) of the City Centre, improving

environmental quality and the improvement of Gloucester as a destination for tourism and inward investment.

- 4.10 It will however be necessary for the Core Strategy and associated Development Plan Documents to ensure that new development in the Central Area does not impact harmfully upon the City's important built heritage including its numerous Listed Buildings, Conservation Areas and Scheduled Ancient Monuments.
- 4.11 It will also be important to ensure that regeneration of the Central Area does not take place at the expense of other areas of the City particularly those wards, which suffer from acute levels of deprivation.
- 4.12 It will also be necessary to ensure that the provision of a balanced mix of uses for example through mixed use development does not result in conflict between different uses for example noise and disturbance arising from an employment use located next to a housing site.
- 4.13 The transport implications of additional growth in the Central Area are potentially significant and will need to be carefully resolved through the LDF process.
- 4.14 In economic terms, the continued expansion of Waterwells Business Park as an underlying principle of the Spatial Strategy scores well. It will however be necessary to ensure that other employment opportunities are provided across Gloucester. Not every firm will want to or can afford to occupy premises at Waterwells and the need for a suitable range of different types of premises across the City will need to be taken into account.
- 4.15 The impact of the spatial strategy is likely to vary from short to long term depending on which particular aspect of the strategy is considered. Focusing for example on high-density development and the re-use of previously developed land and buildings is an established part of Government policy and is already well underway in Gloucester. The impact of the strategy in this regard is therefore likely to be short term.
- 4.16 Other components of the strategy will take longer to come to fruition for example reducing the need to travel, which will require not only infrastructure improvements but also a large degree of culture change.
- 4.17 Other components of the strategy are more ongoing and the impact of these will be felt both in the short and long term for example resisting out of centre retail development and encouraging development which attracts a lot of people into the City Centre.
- 4.18 The strategy will impact on the whole of Gloucester although the greatest area of change will be the Central Area (as defined by the Gloucester Heritage Urban Regeneration Company). The strategy recognises the role of Gloucester as a Principal Urban Area. There will be some trans-boundary effects felt particularly in the longer term if Gloucester needs to expand into adjoining districts in order to accommodate required levels of growth.

Do-Nothing or Business as Usual Scenario

- 4.19 Under a 'do-nothing' or 'business as usual' scenario there is much less opportunity for the Core Strategy Development Plan Document (DPD) to fulfil the main objectives of sustainable development.
- 4.20 Particular problems arising if the proposed Spatial Strategy were not put in place are likely to include:
- Possible encroachment of development into environmentally sensitive parts of the City
 - Harm caused to the City Centre through competition from out of centre retail and leisure developments
 - Inefficient use of land
 - Vacant and derelict land remaining vacant and derelict
 - Increasing reliance on the private car and associated increases in congestion
 - Unnecessary need to travel
 - The loss of the few remaining Greenfield sites available in Gloucester
 - Insufficient provision for industry and the economy resulting in less inward investment and fewer job opportunities
 - People are less likely to have access to all of the essential services they require
 - Pressure for development on existing public open space and other recreational facilities
 - Gloucester may continue to fall further down the 'ranks' as a shopping destination; and
 - Potential decline in the quality of Gloucester's built and natural heritage

Comment/Suggested Changes

- 4.21 The sustainability appraisal of the Spatial Strategy highlights the fact that it does not fully address all areas of sustainability and the concept of 'spatial planning'.
- 4.22 More explicit reference could for example be made in the strategy to the following issues:
- Climate change
 - Renewable energy
 - Pollution
 - Highway safety
 - Reducing crime
 - Improving health
 - Affordable housing
 - Education
- 4.23 It is therefore suggested that these issues are taken more fully into account in revising the Spatial Strategy prior to the publication of Preferred Options in January 2006.

Core Policies

- 4.24 As set out previously, the Core Strategy includes 16 Core Policies each of which have two or more possible options. We have subjected each of these to a Sustainability Appraisal. For completeness, we have also assessed the 'business as usual' or 'do nothing' scenario. In other words what are the sustainability implications of not having the policy in place.
- 4.25 The results of the appraisal are set out in full at Appendix B and are briefly summarised below.

Core Policy 1 – Key Development Principles

- 4.26 The purpose of this proposed Core Policy is to set out the key principles that the Council will apply in its assessment of all development proposals ranging from small domestic proposals to large commercial developments.

The Options

- 4.27 Two options are put forward. Option A is a criteria based policy which specifies that development will only be permitted if certain criteria are met including; compliance with the Spatial Strategy and the objectives of sustainable development, efficient use of land, and high standard of design.
- 4.28 Option B is a more general policy, which states that all new development will be expected to comply with the Spatial Strategy and the underlying principles of sustainable development.

Overall Findings

- 4.29 The provision of an over-arching policy that requires all development to be in accordance with the Spatial Strategy (which is itself based on the fundamental principles of Sustainable Development) scores well in terms of ensuring that future development proposals are in accordance with sustainability objectives.
- 4.30 Although Option A is more prescriptive, a number of the criteria which development will be required to satisfy, are dealt with under the Spatial Strategy already (e.g. protection of built and natural environment, reducing car use, making efficient use of land).
- 4.31 It may therefore be more appropriate to rely on Option B.

Do-Nothing or Business as Usual Scenario

- 4.32 The effects of this over-arching policy not being put in place are not significant because the majority of key issues covered by the Spatial Strategy are dealt with through other Core Policies. The Spatial Strategy will also itself be a material consideration in dealing with development proposals.
- 4.33 Notwithstanding this, in order to fully ensure that all new development accords with the Spatial Strategy (and thus the sustainable development objectives contained within it) an overarching policy is considered to be a worthwhile inclusion within the Core Strategy document.

Comment/Suggested Changes

- 4.34 The appraisal demonstrates that the criteria-based approach adds little additional value in sustainability terms. In light of the need to ensure policies are succinct, it may therefore be preferable to pursue the more general policy approach set out in Option B.

Core Policy 2 – Housing Provision

- 4.35 The purpose of Core Policy 2 is to set out Gloucester's overall housing requirement. Recent Government advice suggests that this should cover a period of at least 15 years.

The Options

- 4.36 Four options are put forward. Option A seeks to identify a 15-year supply of housing based on figures contained in the Gloucestershire Structure Plan Third Alteration. Option B seeks to use the Structure Plan requirement as a minimum. Option C identifies a 16-year supply of housing primarily to allow the Core Strategy to cover a period of 10 years from the anticipated date of adoption. Option D is a more general statement that the Council will meet the housing requirements of the Regional Spatial Strategy (due to published in draft in April 2006).
- 4.37 All four options also set out a number of criteria against which the allocation of housing sites and consideration of speculative proposals will be considered including compliance with the Spatial Strategy, re-use of previously developed land and buildings, accessibility and proximity to existing shops and services.

Overall Findings

- 4.38 The nature of this policy means that it scores highly in sustainability terms in some respects and less well in others. Each option for example scores well in terms of ensuring that everyone has access to safe and affordable housing reducing homelessness and improving access to essential services. Whilst they score less well in terms of minimising the demand for raw materials and reducing the amount of waste that is generated as more dwellings equates to more construction, more people and more waste production for example.
- 4.39 Option A is likely to have the least detrimental impact in environmental terms as the other options (option D depending on the draft RSS) will lead to more homes being built.
- 4.40 This may however mean fewer opportunities for affordable housing provision.
- 4.41 Treating the Structure Plan Third alteration requirement as a minimum or seeking to purposefully exceed it is likely to increase development pressure on Greenfield sites. The impact of Option D is dependent on the housing figures set out within the draft RSS for the South West which is expected in draft form in April 2005. It is difficult therefore to comment on the implications of this option at this stage. However given the stance of the Regional Assembly to date it is reasonable to assume that housing numbers for Gloucester as a Principal Urban Area will exceed current requirements in terms of the annual build rate.

- 4.42 The addition of the criteria against which allocations and speculative proposals will be assessed into all four options means they will all help to ensure that what house building does take place, happens in the most sustainable locations.

Do-Nothing or Business as Usual Scenario

- 4.43 Under a 'do-nothing' scenario, there will be less certainty about the amount of new houses that should be built. This could lead to a potential over-supply or under-supply of houses. It may also increase development pressure on more sensitive sites.

Comment/Suggested Changes

- 4.44 Given the fact that the Structure Plan Third Alteration is being held in abeyance it may be more appropriate to base the City's housing requirement on the forthcoming draft RSS.
- 4.45 The impact of any increase in housing numbers may be mitigated through a phased approach to provision. Housing monitoring would then allow for more, or fewer sites to be released depending on build rates achieved. This would be consistent with the Government's 'plan monitor and manage' approach.

Core Policy 3 – Affordable Housing

- 4.46 Core Policy 3 sets out the Council's affordable housing requirement in relation to new residential development i.e. the amount of affordable housing expected as part of new development and the size of development that this requirement will be applied to.

The Options

- 4.47 Four options are put forward. Options A, B and C are similar seeking an element of affordable housing on new housing sites of 15 or more dwellings or 0.5 hectares irrespective of the number of dwellings. The target level of provision under each option is 40% of the net site area although under Options B and C this is identified as a minimum level of provision.
- 4.48 Option D is the most stringent of the options put forward seeking affordable housing provision on sites of 5 or more dwellings or 0.2 hectares irrespective of the number of dwellings. It also identifies a level of provision of 40% of the net site area.

Overall Findings

- 4.49 Core Policy 3 will not increase the number of houses being built in Gloucester rather it will ensure that a proportion of those houses that are built are 'affordable'. In sustainability terms therefore each option scores well. Particular objectives that will be met include seeking to ensure that everyone has access to safe and affordable housing as well as reducing homelessness.
- 4.50 As with Core Policy 2 – Housing Provision, the construction of new affordable dwellings has implications in terms of the consumption of raw materials as well as water consumption and waste generation.

- 4.51 In sustainability terms there is little difference overall between each of the options although clearly Options B and D would yield the highest number of affordable dwellings.

Do-Nothing or Business as Usual Scenario

- 4.52 Under a 'do nothing' scenario, fewer affordable dwellings are likely to be provided. Gloucester's identified housing need (2004 Housing Needs Survey) will therefore not be met.
- 4.53 The total number of dwellings built will not be affected but the proportion of these that are 'affordable' will be significantly reduced contrary to a number of sustainable objectives.

Comment/Suggested Changes

- 4.54 In order to ensure greater social cohesion/interaction, the policy could specify the need for affordable housing on larger housing sites in particular, to be distributed evenly or 'pepper-potted' across the site in order to avoid isolation and encourage integration.

Core Policy 4 – Employment Provision

- 4.55 Core Policy 4 will set out the Council's approach towards the provision of new employment land. Three options are proposed.

The Options

- 4.56 Option A is a general policy commitment towards strategic employment development at RAF Quedgeley and Waterwells with provision to be made elsewhere in order to meet economic needs.
- 4.57 Option B seeks to identify a target for employment provision based on the total number of additional jobs created. Option C seeks to provide for X hectares (yet to be determined) in accordance with the Regional Spatial Strategy.

Overall Findings

- 4.58 Clearly the provision of additional employment opportunities through new floorspace or a jobs-based target will meet a number of sustainable economic objectives and each option scores highly in this regard, particularly the creation of new and lasting full time jobs and encouraging inward investment.
- 4.59 Option B in taking a 'number of jobs created' approach, should help to ensure more fully that new and lasting full time jobs are created than say Option C which is based on floorspace. This is because some forms of employment e.g. B8 – storage and warehousing have much lower employment densities than other forms of employment such as B1 office or light industrial.
- 4.60 The potentially negative impacts of the different options centre around the need for new construction. As with new housing, the construction of new employment premises will have some negative impacts in terms of the use of raw materials, waste generation, water consumption and emissions.

- 4.61 Option A offers the greatest level of flexibility although it may prove difficult to implement and monitor. It also offers less certainty to landowners and developers as to the amount of employment land needed.

Do-Nothing or Business as Usual Scenario

- 4.62 Under a do-nothing scenario, employment land is still likely to be built but there can be no guarantee that it will be of the right type and in the right location.
- 4.63 Sites that are suitable for employment provision may also come under pressure from higher value forms of development such as residential. There will also be much less certainty from the market's perspective.

Comment/Suggested Changes

- 4.64 In order to more fully meet the sustainable objective of supporting and encouraging the growth of small businesses, it may be appropriate to refer in the policy to meeting the needs of smaller businesses within the City. The policy could also be improved by requiring employment development to be built on previously developed land or utilised existing buildings. Option B, which takes a jobs-based approach is most likely to have an impact in terms of job-creation although may prove difficult to implement in practical terms.

Core Policy 5 – Transport and Accessibility

- 4.65 Core Policy 5 seeks to identify certain transport and accessibility requirements that the Council expects to be met for all new development.

The Options

- 4.66 Two options are put forward - both criteria based policies that identify a number of criteria that must be met before planning permission will be granted. These include accessibility by a choice of means of transport, compliance with Local Transport Plan objectives, parking provision, compliance with RPG10 standards and in the case of major development the provision of adequate highway infrastructure.

Overall Findings

- 4.67 The thrust of this policy is to reduce car use by ensuring that new development is accessible by a choice of means of transport. Both options therefore score highly in terms of the majority of sustainable objectives including in particular, reducing the need to travel, ensuring alternatives to the private car are available and improving access to essential basic services including access for disabled people through application of the Council's parking standards. Good transport infrastructure is also likely to prove attractive to potential investors. There may be indirect benefits in terms of improving the ability of people to access essential services.
- 4.68 There are no major sustainability concerns associated with either Option A or B and both options score similarly overall. Option B scores slightly higher because it positively seeks to encourage a reduction in the need to travel, especially by car.

Do-Nothing or Business as Usual Scenario

- 4.69 Exclusion of this policy will mean that there is less opportunity to ‘steer’ new development to the most sustainable locations i.e. locations which are not car dependent. This may lead to an increase in the number of car journeys being made or at least limit the opportunities to encourage a reduction in car use.

Comment/Suggested Changes

- 4.70 In view of the similarities between the two policy options it may be advisable to combine them together. Reference to the need for travel plans in major and some minor development should be retained. The policy could be amended further to require all development to take into account the needs of people with disabilities.

Core Policy 6 – Regeneration of the Central Area

- 4.71 This policy seeks to outline the Council’s commitment to the regeneration of the Central Area of Gloucester, which is the thrust of the proposed Spatial Strategy.

The Options

- 4.72 Three options are put forward. Option A is a positive statement that states the City Council will encourage the regeneration of the Central Area of Gloucester through suitable new development. Option B is more prohibitive stating that development not in accordance with the Spatial Strategy of Central Area regeneration will be resisted. Option C is another general statement that all new development should be consistent with the approved Spatial Strategy.

Overall Findings

- 4.73 All three options are similar and would have similar benefits in sustainability terms. They therefore score very similarly when applied to the SA Framework. In ensuring that new development accords with the overall spatial strategy which focuses on central area regeneration, each option scores well in terms of encouraging the re-use of previously developed land and buildings, ensuring access to shops and services, reducing the need to travel and reducing the amount of derelict and vacant land.
- 4.74 There is however some potential for repetition with Core Policy 1, which also requires new development to be in accordance with the Spatial Strategy. Option C for example essentially repeats the main objective of Core Policy 1.
- 4.75 Both options present potential conflict with the protection of the historic environment. Many of Gloucester’s historic and cultural assets are in the centre of Gloucester and care will be needed to ensure that new development takes into account the need to protect the historic environment.

Do-Nothing or Business as Usual Scenario

- 4.76 The exclusion of this policy is unlikely to have a significant effect as the main objective of the policy (the regeneration of Central Gloucester) is already covered in Core Policy 1 and the proposed Spatial Strategy itself.

Comment/Suggested Changes

- 4.77 Given the repetition between Core Policy 6 and Core Policy 1, in the interests of keeping the number of policies down to a minimum it may be advisable to delete Core Policy 6 as it adds little extra in sustainability terms.

Core Policy 7 – City Centre and Retail Development

- 4.78 This policy sets out a general commitment towards the protection of Gloucester's Primary Shopping Area and other designated centres (District and Local Centres).

The Options

- 4.79 Three options are proposed. Option A is a general statement of the Council's commitment towards improving the health of designated centres. It also allows for the creation of new centres in appropriate locations.
- 4.80 Option B simply states that permission will not be granted for any development that would cause harm to the health of a designated centre.
- 4.81 Option C takes a criteria based approach seeking to resist out of centre retail development unless it can be demonstrated that there is a need for the development, that no other more centrally located sites are available, the development would not harm the Spatial Strategy, it would not impact harmfully upon existing centres and that it would be accessible by a choice of means of transport.

Overall Findings

- 4.82 The main objective of this policy is to protect the health and well being of Gloucester's designated centres. Each option seeks to achieve this but in slightly different ways. This policy is largely unrelated to the majority of the sub-objectives set out in the SA Framework although each options scores in relation to a number of social and economic objectives.
- 4.83 These include improving Gloucester as a tourist destination, ensuring access to shops and services, reducing the need to travel and maintaining and enhancing the vitality and viability of designated centres.
- 4.84 Option A in allowing for the creation of new centres in appropriate locations creates some potential conflict with a number of objectives including the consumption of raw materials and production of waste. On the positive side however additional local centres are likely to further improve access to essential shops and services and may reduce the need to travel by car. Option A also seeks to improve the vitality and viability of the City Centre and other designated centres.

Do-Nothing or Business as Usual Scenario

- 4.85 Under a 'do nothing' scenario, there will be increased development pressure in locations outside designated centres thus creating potentially harmful impacts on those centres.
- 4.86 This may also lead to an increase in the number of car journeys made.

Comment/Suggested Changes

- 4.87 None – although repetition with similar Development Control Policies should be avoided.

Core Policy 8 – Mixed-Use Development

- 4.88 Core Policy 8 sets out the Council's commitment to mixed-use development in appropriate locations (i.e. development involving more than one land use such as housing above shops).

The Options

- 4.89 Three options are put forward. Option A encourages mixed-use development in appropriate locations. Option B encourages mixed-use development within existing buildings, for new buildings and for larger schemes. Option C requires all larger development schemes within the Central Area to incorporate a mix of different uses unless it can be demonstrated that a mix of uses is not desirable or achievable.

Overall Findings

- 4.90 Options A and B are very similar and both score well in sustainability terms. Mixed-use development offers the potential to make efficient use of land and allows for a reduction in car use through linked trips. It can also add vitality to an area by creating activity throughout the day not just between 9am and 5pm.
- 4.91 Option B is explicit in encouraging mixed-use development within existing buildings and therefore scores well in terms of re-using previously developed land and buildings. Option A in specifying that mixed-use development should involve compatible uses in appropriate locations scores well in terms of improving access to essential services and protecting vulnerable assets. Both options have potential economic benefits as mixed-use developments can enliven evening economies through increased evening activity.
- 4.92 Option C is the most stringent policy and therefore scores slightly higher in sustainability terms than Options A and B. Requiring all development to be mixed-use unless not feasible or desirable should increase the number of mixed-use schemes coming forward. There are concerns however over the definition of 'larger' development schemes as well as the potential for developers to simply argue that a mix of uses is not desirable. The Policy should perhaps therefore be tightened further.

Do-Nothing or Business as Usual Scenario

- 4.93 The implications of excluding a mixed-use policy are not significant as some mixed-use development will occur regardless. However, there may be missed opportunities for developing innovative mixed-use schemes and as a result there may be less efficient use made of land, greater land-take than would otherwise be necessary and fewer opportunities to benefit from reduced car use through linked trips.

Comment/Suggested Changes

- 4.94 Requiring all larger development proposals to incorporate a reasonable mix of uses yields the most benefits in sustainability terms.

Core Policy 9 – Design and Density

- 4.95 Core Policy 9 seeks to encourage all new development to be of high quality design and to make the most efficient use of land.

The Options

- 4.96 Only two options are put forward. Option A requires development to be of high quality whilst making the most efficient use of land. Particular regard must be had to the rhythm, density, massing, layout and appearance of neighbouring buildings. Option B expects all new development to be of the highest possible quality in design terms and to make the most efficient use of land through density of development.

Overall Findings

- 4.97 Both options are similar and score well when assessed against the Sustainability Framework. Making the most efficient use of land is consistent with a number of objectives including, protection of vulnerable assets, encouraging development on previously developed land, reducing the consumption of raw materials and reducing the amount of vacant and derelict land.
- 4.98 Ensuring good design from new development is also consistent with a number of sustainable objectives including reducing crime and fear of crime, improving the quality of where people live and improving the attraction of Gloucester as a visitor destination.
- 4.99 There is little difference between the two options in sustainability terms.

Do-Nothing or Business as Usual Scenario

- 4.100 Good design and making efficient use of land are fundamental tenets of Central Government Policy and therefore the exclusion of this policy is unlikely to suddenly lead to poorly designed, low-density schemes coming forward. However the inclusion of such a policy places the City Council in a much stronger position to negotiate with developers to ensure good design and efficient use of land and to refuse applications that are not consistent with these objectives.

Comment/Suggested Changes

- 4.101 None.

Core Policy 10 – Community Safety

- 4.102 Core Policy 10 seeks to set out a general requirement for all new development to have regard to the issue of community safety. This is an important issue for Gloucester which has a higher than average rate of crime.

The Options

- 4.103 Three Options are put forward. Option A requires all new development to have regard to the key principles of community safety. Option B states that permission will not be granted for any development that would contribute to an increase in crime or the fear of crime. Option C expects all new development to contribute to the strategic objective of increasing community safety.

Overall Findings

- 4.104 Reducing crime and the fear of crime is one of the sub-objectives set out within the Sustainability Framework. All three options are clearly consistent with this objective and therefore score highly in this regard. Because this topic is quite specific, each option is largely unrelated to the majority of sub-objectives set out in the SA Framework. There may be some positive benefits however in terms of helping to improve the quality of where people live and encouraging the provision of safe housing.
- 4.105 There is no difference between the three different options in sustainability terms.

Do-Nothing or Business as Usual Scenario

- 4.106 Good design can ensure that the opportunity for crime is reduced which then reduces both the fear of crime and actual occurrence of crime. Excluding this policy means there will be less scope for the Council to negotiate and seek appropriate design solutions in new development such as improving surveillance or reducing the number of potential 'escape routes'.

Comment/Suggested Changes

- 4.107 None.

Core Policy 11 – Protection of the Built and Natural Environment

- 4.108 Core Policy 11 sets out a general presumption against development that would cause harm to Gloucester's built and natural environment. It is intended to be a generic policy that would apply to a range of designations from Sites of Nature Conservation Interest and the River Severn Floodplain to Conservation Areas and Listed Buildings.

The Options

- 4.109 Two similar options are put forward. Option A states that any development that would cause harm to Gloucester's built and/or natural environment will not be permitted, whilst Option B states that all new development will be expected to protect and wherever possible, enhance the City's built and/or natural environment.

Overall Findings

- 4.110 Both options score extremely well when assessed against the Sustainability Framework including in particular the following objectives; minimising the risk of flooding, conserving and enhancing natural and semi natural habitats, maintaining and enhancing sites of nature conservation importance, improving the quality of where people live and maintaining, air, soil and water quality.
- 4.111 Option B scores slightly higher overall because it states that new development will be expected to protect and wherever possible, enhance the City's built and/or natural environment.

Do-Nothing or Business as Usual Scenario

- 4.112 Although the built and natural environment will be protected by a number of separate policies relating to conservation areas, listed buildings, sites of nature conservation importance etc. it is considered useful to include a more generic policy that applies to each. This will ensure that consideration is given at all times to the protection of the built and natural environment. It will also ensure that areas of interest that are not covered by other policies will be protected from inappropriate development.

Comment/Suggested Changes

- 4.113 Encouraging new development to 'enhance' wherever possible, the built and/or natural environment is likely to yield greater benefits in terms of sustainability.

Core Policy 12 – Community Provision

- 4.114 Core Policy 12 sets out a commitment towards the provision of new community facilities and the protection of existing ones.

The Options

- 4.115 Two options are put forward. Option A seeks to encourage new community facilities in locations that are accessible by a choice of means of transport and are well related to the area they intend to serve, whilst resisting the loss of existing facilities other than in exceptional circumstances. Option B also seeks to encourage new community facilities in locations that are accessible by a choice of means of transport and are well related to the area they intend to serve although takes a criteria based approach in relation to the loss of existing community facilities. The loss of these will only be permitted where either the facility is replaced within the new development or in an alternative location, or it can be demonstrated that the facility is not in use and is surplus to requirements.

Overall Findings

- 4.116 Both options score well in sustainability terms. Particular objectives that would be met through either policy option include: reducing the need to travel, improving access to services, encouraging community engagement and improving community cohesion.
- 4.117 There are no major potential conflicts although there may be a small increase in the consumption of raw materials and the production of waste through the creation of new community facilities. The level of impact will however depend on the number of facilities that come forward.

Do-Nothing or Business as Usual Scenario

- 4.118 Under a 'do nothing' scenario, there may be increased pressure for new community facilities in locations that are not well served by a choice of means of transport. This may lead to an increase in the number of car journeys and less opportunity for walking, cycling and using public transport. It may also limit the opportunities for people with disabilities to access such facilities.
- 4.119 There may also be increased pressure on existing community facilities. Excluding this policy will provide the City Council with less opportunity to resist the loss of community facilities, which may lead to a reduction in the number of facilities available to Gloucester residents.

Comment/Suggested Changes

- 4.120 Community provision is an important element of sustainable development and this policy fulfils a number of sustainable objectives. A criteria-based approach to the loss of existing facilities provides clearer guidance as to the circumstances in which the loss of an existing community facility may be considered acceptable.

Core Policy 13 – Access to Shops and Services

- 4.121 Core Policy 13 seeks to support new development that would lead to an improvement in people's ability to access shops and services including jobs, housing, health, education, shops, leisure and community facilities, open space, sport and recreation.

The Options

- 4.122 Only one option is put forward which, subject to compliance with other relevant policies, offers positive support for new development that would improve people's access to shops and essential services.

Overall Findings

- 4.123 The policy is very specific and is largely unrelated to the majority of sub-objectives set out in the SA Framework. There will however be positive impacts particularly in terms of reducing the need to travel and helping people to access essential services. Less obvious positive impacts might include helping to reduce deprivation (by improving access to services – one of the key barriers) and improving access to learning and skills opportunities.
- 4.124 There may be some negative impacts associated with new development (which the policy is seeking to support in accessible locations) in terms of the consumption of raw materials.

Do-Nothing or Business as Usual Scenario

- 4.125 The do nothing implications are not significant as this policy seeks to positively support new development that is accessible rather than resist development which is not accessible.

Comment/Suggested Changes

- 4.126 In order for this policy to more fully comply with sustainable objectives, it could be re-phrased to state that permission will not be granted for new development unless it is accessible to local shops and services. Explicit reference could also be made to meeting the needs of people with disabilities.

Core Policy 14 – Sport and Recreation

- 4.127 Core Policy 14 seeks to protect and to provide public open space and other sport and recreational facilities. Gloucester has a deficit of public open space compared to nationally recommended standards and this is therefore an important issue. Certain areas of the City are more deficient than others in terms of open space and sport/recreation facilities.

The Options

- 4.128 Four options are put forward. Option A relates solely to the provision of new public open space in new residential and employment development. The level of provision will be a matter for negotiation but will not be less than 2.8 hectares per 1,000 population.

- 4.129 Option B relates to the provision and protection of sports and recreational facilities (not just open space). New facilities will be positively encouraged in accessible locations whilst the loss of existing facilities will only be permitted in exceptional circumstances. Option C is very similar although states that permission will be granted for new facilities in accessible locations rather than 'will be encouraged'.
- 4.130 Option D sets out a general presumption in favour of new sports and recreational facilities in accessible locations and adopts a criteria based approach towards the loss of existing sports and recreation facilities the loss of which will only be considered acceptable if it can be demonstrated that the facility is no longer needed, that a deficiency in provision will not arise if the facility is lost, or the importance of the proposed development outweighs the recreational and amenity value of the site and suitable alternative provision can be found in an equally accessible location.

Overall Findings

- 4.131 All four options score well in sustainability terms. Particular objectives that the policy is compatible with include, improving the quality of where people live, improving community cohesion, improving health, reducing the need to travel especially by car, the provision of additional leisure facilities and improving the attraction of Gloucester as a tourist destination.
- 4.132 Option A relates solely to public open space and therefore scores slightly less well than the other options which relate to sports and recreational facilities as a whole (including open space). Option A also fails to offer protection to existing facilities. The identification of a clear target level of provision does however add extra clarity to this option.
- 4.133 Options B and C are very similar and this is reflected in the sustainability appraisal, which shows no difference in their results.
- 4.134 Option D arguably performs best as it allows positively for new sports and recreational facilities in accessible locations whilst setting out clear criteria against which the loss of existing facilities will be considered. This will help to ensure that existing facilities are only lost to other forms of development where there is a genuinely sound case.

Do-Nothing or Business as Usual Scenario

- 4.135 Under a do-nothing scenario there is a danger that new facilities may be provided in locations that are not accessible by a choice of means of transport, thus increasing the use of the car and limiting opportunities for walking, cycling or using public transport.
- 4.136 There may also be increased development pressure on existing sports and recreational facilities and less policy support to resist such proposals.

Comment/Suggested Changes

- 4.137 Option A addresses only public open space and also relates to the provision of new facilities not the protection of existing. Options B and C are unclear in terms of what the 'exceptional circumstances' in which permission for the loss of existing sports and recreational facilities, will be permitted.

Core Policy 15 – Culture and Tourism

- 4.138 Core Policy 15 sets out a presumption in favour of new cultural and tourist facilities in appropriate locations and a presumption against the loss of existing facilities other than in exceptional circumstances.
- 4.139 Gloucester has an important heritage and this issue is extremely important in terms of sustainable development at the local level.

The Options

- 4.140 Two options are proposed. Option A encourages the provision of new cultural and/or tourist facilities in the Central Area particularly where they are well related to existing attractions and allows for the loss of existing facilities in exceptional circumstances (but does not define what these might be).
- 4.141 Option B is less prescriptive in terms of new facilities steering these to the Central Area but not necessarily to locations that are well related to existing attractions. In terms of the loss of existing cultural and tourist facilities the policy is more prescriptive than Option A in that it identifies a number of criteria which must be met before permission will be granted including whether it can be demonstrated that the facility is no longer needed or viable, whether it will be replaced elsewhere or it can be demonstrated that the facility was poorly located in the first instance.

Overall Findings

- 4.142 Both Options score well in sustainability terms. Particular objectives that would be met include, increasing the attraction of Gloucester as a tourist destination, maintaining the City's cultural assets and increasing participation in cultural activities.
- 4.143 Option A scores well in terms of reducing the need to travel by seeking to link new facilities to existing ones (thus creating the opportunity for linked trips).
- 4.144 Option B offers clearer guidance on the factors that will be taken into account by the Council in considering applications involving the loss of existing cultural or tourist facilities. It therefore scores marginally higher in terms of maintaining and enhancing the vitality and viability of designated centres.

Do-Nothing or Business as Usual Scenario

- 4.145 Under a 'do nothing' scenario, there is a danger that new cultural and/or tourist facilities will be built in inappropriate locations that tend to increase reliance on the private car and limit the opportunity for linked trips.
- 4.146 There is also a danger that existing facilities will be more prone to development pressures and may be lost to higher value uses without proper scrutiny of the implications.

Comment/Suggested Changes

- 4.147 It is suggested that elements of Options A and B could usefully be combined to create a stronger, more sustainable policy. In other words to retain the criteria based approach of Option B whilst ensuring that new facilities are well related to existing ones – as per Option A.

Core Policy 16 – Developer Contributions

- 4.148 Core Policy 16 seeks to ensure that developers make reasonable contributions either directly or indirectly to offset the impact of their development for example the provision of new highway infrastructure, affordable housing provision or a financial contribution towards additional school places.

The Options

- 4.149 Three options are put forward. Option A states that under Section 106 of the 1990 Act, developers will be expected to make reasonable contributions in the form of land or otherwise towards the provision of infrastructure and community services. Option B is identical to Option A although adds that the nature of any provision will be a matter for negotiation on a site by site basis.
- 4.150 Option C is also similar stating that the City Council will ensure that new development does not burden Gloucester's existing infrastructure and where appropriate will enter into an agreement to ensure that the impact of development is mitigated.

Overall Findings

- 4.151 All three options are very similar and therefore score equally well in sustainability terms. Particular objectives that are met through this policy include, improving road safety and reducing traffic congestion, improving the quality of where people live, providing affordable housing in some cases and the provision of additional green spaces and recreational facilities particularly in larger developments.

Do-Nothing or Business as Usual Scenario

- 4.152 Developer contributions are an established and accepted part of the planning process. Notwithstanding this, the exclusion of this policy will place the Council in a weaker position when negotiating to ensure that suitable infrastructure improvements are made to mitigate the impact of development. This may lead to new development placing an unacceptable and harmful impact on existing infrastructure.

Comment/Suggested Changes

- 4.153 None.

SCHEDULE OF CORE POLICIES

- Core Policy 1 – Key Development Principles
- Core Policy 2 – Housing Provision
- Core Policy 3 – Affordable Housing
- Core Policy 4 – Employment Provision
- Core Policy 5 – Transport and Accessibility
- Core Policy 6 – Regeneration of the Central Area
- Core Policy 7 – City Centre and Retail Development
- Core Policy 8 – Mixed Use Development
- Core Policy 9 – Design and Density
- Core Policy 10 – Community Safety
- Core Policy 11 – Protection of the Built and Natural Environment
- Core Policy 12 – Community Provision
- Core Policy 13 – Access to Shops and Services
- Core Policy 14 – Sport and Recreation
- Core Policy 15 – Culture and Tourism
- Core Policy 16 – Developer Contributions