

**GLOUCESTER LOCAL DEVELOPMENT
FRAMEWORK**

**SUSTAINABILITY APPRAISAL OF THE SITE
ALLOCATIONS & DESIGNATIONS (NON-
CENTRAL AREA) DPD (PREFERRED OPTIONS)**

AUGUST 2006

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1. INTRODUCTION

- 1.1 This report outlines the findings of a Sustainability Appraisal carried out on the Site Allocations and Designations (Non-Central Area) Preferred 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 preferred 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 Comments on this Sustainability Appraisal are invited until **18th September 2006**
- 1.5 All of the comments we receive will be taken into account and will feed into the final draft Site Allocations and Designations (Non-Central Area) document, which will be formally submitted to the Secretary of State for approval in March 2007.

2. BACKGROUND

2.1 The Council is in the process of preparing a Local Development Framework for Gloucester (LDF). This will replace the existing Local Plan. The LDF will consist of four main Development Plan Documents (DPDs) 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.

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 This appraisal relates to the Preferred Option version of the Site Allocations and Designations (Non-Central Area) document (i.e. the second stage of consultation).

2.5 The final draft Site Allocations/Designations document will be submitted in March 2007 and a final Sustainability Report will be prepared at that time.

2.6 This Sustainability Appraisal should be used to inform your responses to the Preferred Option Site Allocation and Designation (Non-Central Area) consultation document.

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

What is Sustainable Development?

2.8 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'.

2.9 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.

2.10 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

2.11 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 improve health and enhancing people's ability to engage in healthy activities as well as whether it would improve access to health care facilities or improve access to opportunities for learning, training, skills and knowledge.
- 3.10 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). Such a 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 preferred option in order to determine how well it performs in sustainability terms.
- 3.14 Officer workshops were held in June/July 2006 during which the performance of each of the preferred options 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 2 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 Section 4.0 below. We deal with policies and proposals as they are set out in the preferred option document itself.

4. BASELINE INFORMATION

- 4.1 Our Core Strategy Development Plan Document sets out a range of baseline information about the City. Much of this is relevant to our sustainability appraisal of the policies and proposals set out in the Site Allocations and Designations DPD. Set out below is a summary of some of the most relevant baseline information. Further baseline information is set out at Appendix 1.
- 4.2 Gloucester along with Cheltenham is defined as a Strategically Significant City. These two settlements are the focus for growth in the County under the draft Regional Spatial Strategy for the South West.
- 4.3 The draft RSS states that 11,500 new homes should be provided in Gloucester in the period 2006 – 2026.
- 4.4 Although house prices are lower than the County average in Gloucester, average incomes are also low and this coupled with higher than average annual house price increases, has caused problems for first-time buyers in particular, creating pressure on the rented sector and on social housing.
- 4.5 A recent Housing Needs Survey carried out by 'Outside Research' on behalf of the City Council, identified an acute need for affordable housing in Gloucester with approximately 1,234 affordable dwellings being needed each year in order to clear the existing backlog of housing need and to meet those in future housing need.
- 4.6 As one of the principal urban areas within the south West Region, Gloucester is a major employment centre. The annual business enquiry (ABI) 2002 estimates that there are 3700 businesses in Gloucester employing a total of 60,700 people.
- 4.7 The majority of business units are small employers with almost 60% of businesses in Gloucester employing 1-4 employees in 2002. There has however been a decline in the number of VAT registered businesses in the City, from 2,815 in 1997 to 2,500 in 2004.

- 4.8 Gloucester is significantly more deprived than any other district in the County. Barton & Tredworth, Eastgate and Coney Hill are among the 10% most deprived wards nationally in terms of homelessness and unsatisfactory accommodation. In terms of employment deprivation (including sickness and disability), Gloucester is in the worst 50% of districts nationally with three wards, Westgate, Matson and Barton falling within the worst 12% of wards nationally. Westgate is the most deprived ward in Gloucestershire in overall terms.
- 4.9 The health of Gloucester residents is slightly poorer than the local average with 8.6% of people considering themselves to be in poor general health, compared to 7.6% for the County and 9.2% for England and Wales. 16.9% of people in Gloucester have a long-term limiting illness, compared to 16.1% for Gloucestershire as a whole.
- 4.10 Crime rates in Gloucester are higher than County and national averages. The most prevalent crime type in the Gloucester area is theft and handling, which accounts for 23% of all the district's offences. Shoplifting makes up a significant proportion of this and accounts for over 8% of overall crime. Theft of cycles is also an issue with two cycles a day being stolen in the Gloucester area, a figure, that given the city's population, is higher than average amongst similar districts.
- 4.11 Gloucester pupils perform more poorly at all key stages than the national averages except for KS4 (GCSE). Gloucester also has lower than average numbers of people with a degree or other higher qualifications, and higher than average people with no, or few qualifications.
- 4.12 Car ownership in Gloucester is lower than the County average. Gloucester has the highest percentage of households with no car and the lowest percentage of households with two or more cars.
- 4.13 The Council's Public Open Space Strategy published in 2001 demonstrated that Gloucester is deficient in terms of the amount of public open space available. The level of provision in 2001 was 2.19 hectares per 1,000 population compared to the National Playing Fields Association recommended standard of 2.4 hectares per 1,000 people.
- 4.14 In terms of the natural environment, Gloucester has two Sites of Special Scientific Interest (SSSIs) six key wildlife sites and 28 other sites of nature conservation interest. 27% of the City is designated as Landscape Conservation Area and much of the western part of the City falls within the floodplain of the River Severn. There is also a defined Prime Biodiversity Area (PBA) comprising the area of un-built land to the west of the Gloucester - Sharpness Canal (including Hempsted Landfill) and Alney Island.
- 4.15 The built environment of Gloucester is equally important. The city has 707 Listed Buildings, of which 13% are Grade I or II* i.e. of outstanding architectural or historic interest. (Note: the equivalent figure for the whole of England is only 6%). There are also 26 Scheduled Ancient Monuments and 11 designated Conservation Areas.

4.16 In 2003/2004, the amount of household waste and composting in Gloucester amounted to 9.72% of all household waste in the City. This was substantially lower than the rate for both the County and the national averages, which were 20.87% and 22.49% respectively.

5. OVERALL FINDINGS

- 5.1 In this section of the appraisal we summarise for each policy/proposal, the main findings of the completed matrices set out at Appendix 2. This also includes a written assessment of the 'do-nothing' or business as usual scenario.

POLICY DESIGNATIONS

SAD1 – Public Open Space and Private Playing Fields

The Policy

- 5.2 The policy identifies public open space and private playing fields outside the Central Area of the City. These designated areas will be safeguarded in accordance with the criteria set out in Development Control Policy LR1.

Overall Findings

- 5.3 The policy performs well in sustainability terms when assessed against the SA framework. It would for example help to conserve natural and semi-natural habitats. It would also help to ensure that everyone has access to open space by maintaining a network of open spaces across the City.
- 5.4 This in turn will help to reduce the need to travel unnecessarily by car, and will improve the ability of those who don't have access to a car to reach such facilities. The policy will have a direct and positive impact in terms of the provision of recreational facilities and improving people's ability to engage in healthy activities. Secondary impacts will include improved health and improved community cohesion as open spaces often act as a focus for community activities.

Do-Nothing/Business as Usual Scenario

- 5.5 Under the business as usual scenario, there is likely to be increased pressure on Gloucester's open spaces for other forms of development. Excluding the policy will place the Council in a much weaker position in terms of its ability to resist development proposals involving the loss of open space.
- 5.6 Under a worst-case scenario, this will lead to the loss of open spaces and further shortages across the City. It is acknowledged that national policy affords open spaces a degree of protection and that there is separate legislation relating to school playing fields however it is considered vital that the Council has in place a policy identifying the areas of open space that will be safeguarded. Policy LR1 sets out the criteria against which proposals involving open space will be assessed and this is considered to be an appropriate approach.

Comment/Suggested Changes

- 5.7 Gloucester has a demonstrable shortage of open space. Identifying the areas of open space that will be safeguarded helps to provide certainty and resist inappropriate forms of development that would otherwise lead to further shortages. This is a particularly key issue for an urban area like Gloucester.

SAD2 – Landscape Conservation Areas

The Policy

- 5.8 The policy is area-specific and defines the extent of the Landscape Conservation Area boundaries located outside the Central Area. These will be safeguarded in accordance with Development Control Policy BNE4 – Landscape Conservation Areas.

Overall Findings

- 5.9 The policy performs well in sustainability terms. In particular, it will help to conserve and enhance natural and semi-natural habitats and species diversity. In some cases, LCAs will also include Sites of Nature Conservation Importance which will be afforded an additional degree of protection from harmful development.
- 5.10 The policy will also in some cases help maintain tree cover and will help to ensure that areas of green space are available for passive forms of recreation such as walking. This in turn may create potential health benefits. In overall terms, the policy will have a positive impact on the quality of where people live particularly those who live close to a designated area.

Do-Nothing/Business as Usual Scenario

- 5.11 Not defining Landscape Conservation Areas is likely to place these locations under greater development pressure. This may lead to inappropriate forms of development taking place at the expense of landscape quality being harmed.

Comment/Suggested Changes

- 5.12 None.

SAD3 – Green Belt

The Policy

- 5.13 Policy SAD3 identifies a green belt to the south of Gloucester. Within the Green Belt, only appropriate development which would not compromise the open character of the Green Belt or which would not contribute to the coalescence of settlements will be permitted.

Overall Findings

- 5.14 The policy performs well in sustainability terms with particular regard to the environment. There are no predicted negative impacts. The policy will for example, help to conserve and enhance natural habitats with consequent benefits in terms of maintaining and enhancing biodiversity.
- 5.15 It will also help to preserve the historic setting of the City for example, Robinswood Hill. Trees within the defined green belt area will be protected by virtue of the policy.
- 5.16 The policy will help to ensure that green space is retained for informal recreational purposes and should help to maintain the quality of where people live in general terms.
- 5.17 In resisting inappropriate forms of development, the policy may also help to reduce the consumption of raw materials and may help restrict contributions to climate change.

Do-Nothing/Business as Usual Scenario

- 5.18 The draft Regional Spatial Strategy for the South West states that a greenbelt should be identified to the south of Gloucester. The do-nothing scenario is not therefore considered to be an option.

Comment/Suggested Changes

- 5.19 None.

SAD4 - Sites of Nature Conservation Importance and Special Scientific Interest

The Policy

- 5.20 The policy seeks to identify Sites of Nature Conservation Importance including Sites of Special Scientific Interest. Within these areas, biodiversity will be protected and wherever possible, enhanced. Development proposals in these locations will only be permitted where the criteria set out in draft Policy BNE1 of the Development Control Policies DPD are satisfied.

Overall Findings

- 5.21 The policy performs well in sustainability terms. It will have a direct, positive impact in the short term in terms of protecting natural habitats, preserving and enhancing biodiversity and protecting sites of nature conservation interest.
- 5.22 Where there are trees within SSSIs and SNCIs, these will be safeguarded to a large extent by virtue of the policy.
- 5.23 The policy will help to ensure that people have access to greenspace suitable for passive, informal forms of recreation which in turn will have some potential secondary health benefits.
- 5.24 In general terms, maintaining a network of SNCIs and SSSIs is considered to have a positive impact in terms of maintaining the quality of where people live.

Do-Nothing/Business as Usual Scenario

- 5.25 The do-nothing scenario is that sites of nature conservation interest may come under pressure from development. This may lead to the loss of sites and the consequent loss of natural habitat and biodiversity. This is not considered to be a desirable outcome.
- 5.26 SSSIs are protected under national legislation and the do-nothing implications are therefore less significant.

Comment/Suggested Changes

- 5.27 None.

SAD5 – Prime Biodiversity Area

The Policy

- 5.28 Policy SAD5 identifies a Prime Biodiversity Area. Prime Biodiversity Areas (PBAs) 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.

- 5.29 The policy specifies that appropriate development may be permitted within the PBA if it can be shown that the proposal, where possible, will lead to biodiversity gains in the area.
- 5.30 Where appropriate, financial contributions will be sought from new development in 'urban fringe' locations towards the ongoing operation of the 'Sevenside' Project.
- 5.31 The Sevenside Project is a project involving local landowners, community groups, businesses, volunteers and schools designed to conserve, enhance and manage important habitats in order to enhance biodiversity in the area, increase opportunities for quiet, informal recreation and provide opportunities for local community participation and environmental education.

Overall Findings

- 5.32 The policy performs really well in sustainability terms with particular regard to potential environmental impacts. It will help for example to safeguard existing natural habitats with consequent benefits in terms of biodiversity and the protection of trees.
- 5.33 The policy seeks financial contributions from new development towards the 'Sevenside Project'. This will have benefits in terms of community participation and environmental education.
- 5.34 The policy will also help to maintain air, soil and water quality within the defined PBA boundary.

Do-Nothing/Business as Usual Scenario

- 5.35 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.
- 5.36 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.
- 5.37 There may also be missed opportunities to enhance the role and function of the Sevenside Project.

Comment/Suggested Changes

- 5.38 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.

SAD6 – Allotments

The Policy

- 5.39 The policy seeks to identify allotment gardens outside the Central Area. These will be safeguarded. Development involving the loss of part or all of an existing allotment site will only be permitted where the criteria set out in Policy LR6 of the Development Control Policies DPD are satisfied.

Overall Findings

- 5.40 The policy performs well in sustainability terms particularly in relation to environmental sub-objectives. It will for example help to conserve and enhance natural and semi-natural habitats which in turn may help to conserve biodiversity to some extent, depending on the degree to which the site has been cultivated.
- 5.41 The policy will ensure the provision of leisure facilities for those interested in gardening. A broad distribution of sites across the City will help to reduce the need for people to travel by car and will increase accessibility by non-car modes of transport including walking, cycling and public transport.
- 5.42 Other potential benefits include improved health and community cohesion as well as an overall improvement in the quality of where people live.

Do-Nothing/Business as Usual Scenario

- 5.43 Not safeguarding allotments is likely to place them under considerable pressure for development. This may lead to the loss of some sites, which would reduce the potential for this form of passive, informal recreation. The City has a shortage of public open space and increasing housing densities mean new developments often have little or no garden space. Publicly available areas of open space are therefore considered to be an important resource and it is considered appropriate to safeguard it for this purpose.

Comment/Suggested Changes

- 5.44 None.

SAD7 – Robinswood Hill Country Park

The Policy

- 5.45 Policy SAD7 designates Robinswood Hill as a designated as a Site of Nature Conservation Importance and Landscape Conservation Area. Important views of Robinswood Hill will be safeguarded.

Overall Findings

- 5.46 The policy scores similarly to those outlined above as its key objective is the safeguarding of an area of existing green space. This will for example help to preserve and enhance natural habitats and biodiversity, provide protection for a designated site of nature conservation interest and will help to maintain and enhance the hill which can be seen as an important historic and cultural asset for the City.
- 5.47 Other potential positive impacts include improving the attraction of Gloucester as a tourist destination, the provision of additional green space and increasing the ability of local residents to participate in healthy activities.
- 5.48 In general terms the policy will help to maintain soil, water and air quality and will help to maintain the quality of where people live.

Do-Nothing/Business as Usual Scenario

- 5.49 Omission of this policy may lead to development pressure in the fringe locations of the hill with consequent loss of greenspace, natural habitat, opportunities for recreation and so on. This is not considered to be a sustainable or desirable outcome.

Comment/Suggested Changes

- 5.50 Robinswood Hill Country Park was established in the 1960s to satisfy the demand for informal recreation. In view of the shortage of public open space in the City it is a particularly valuable asset that should be safeguarded.

SAD8 – Floodplain

- 5.51 The policy seeks to identify the extent of the floodplain of the River Severn and its tributaries. Development will be controlled accordingly so that it is not at risk from flooding and does not exacerbate the risk of flooding elsewhere.
- 5.52 The extent of the floodplain is defined by the Environment Agency. It is drawn on a technical basis, based on previous flood events. Where there is a 1% chance of flooding or greater the area is defined as high-risk.

Overall Findings

- 5.53 The focus of the policy is very specific and as a result, it is largely unrelated to the majority of sustainability objectives set out in the matrix.
- 5.54 Clearly the policy will help to ensure that the risk to people and property from flooding is minimised. This will also help to ensure indirectly that areas of natural habitat including potentially wetland or semi-wetland habitats are safeguarded from development.
- 5.55 Ensuring development does not take place within flood risk areas will also help to reduce long-term vulnerability to flooding arising from climate change.

Do-Nothing/Business as Usual Scenario

- 5.56 The do-nothing scenario is that development is allowed to take place within the floodplain. This will put people and property at risk from flooding both directly and indirectly. This not considered to be a realistic or sensible option.

Comment/Suggested Changes

- 5.57 None.

SAD9 – Conservation Areas

The Policy

- 5.58 The policy seeks to define Conservation Area boundaries outside the Central Area. These will be safeguarded in accordance with Development Control Policy BNE5.

Overall Findings

- 5.59 The policy is largely unrelated to the majority of sustainability objectives but scores positively in a number of respects. In particular, it will help to maintain and enhance cultural and historic assets, improve the attraction of Gloucester as a destination for tourists and improving the overall quality of where people live.

Do-Nothing/Business as Usual Scenario

- 5.60 The do-nothing scenario is not a realistic option as we are required as a local planning authority to identify designated Conservation Areas. Not defining these areas may place them under greater risk from inappropriate forms of development that may harm and undermine the character of areas of historic and/or architectural importance. This is not considered to be a desirable approach.

Comment/Suggested Changes

- 5.61 Defining and safeguarding Conservation Areas will help to preserve and enhance the historic fabric of the City which will benefit residents and visitors alike. Conservation Area boundaries will be reviewed as part of the LDF process.

SAD10 – Views and Skyline

The Policy

- 5.62 The policy seeks to protect the City's skyline and important views from new development.

Overall Findings

- 5.63 The policy scores reasonably well in sustainability terms although is largely unrelated to the majority of sub-objectives. There are no predicted negative impacts. In positive terms, the policy will help to ensure that the quality of where people live is maintained and enhanced, that cultural and historic assets are maintained e.g. the Cathedral and that the attraction of Gloucester as a tourist destination is maintained.

Do-Nothing/Business as Usual Scenario

- 5.64 The do-nothing implications are that development may be allowed to take place that compromises important views. The city's skyline forms part of its distinctive character and it is important that it is maintained and wherever possible, enhanced.

Comment/Suggested Changes

- 5.65 The policy could be further refined by identifying in detail important view 'corridors', within which development will be controlled. This would provide greater certainty and detail about the locations in which development will be assessed in terms of its potential impact on important views. This should be carried out prior to submission.

SAD11 – District and Local Centres

The Policy

- 5.66 The policy identifies a number of District and Local Centres across the City. These are clusters of shops and services that serve an every day role for shopping and other needs. These centres will be safeguarded and development that would have an adverse impact on the vitality and viability of a designated District or Local Centre will be refused. The loss of shops within a designated centre will be carefully assessed.

Overall Findings

- 5.67 The policy performs well in sustainability terms. There are no predicted negative impacts. Positive impacts are based around the provision of shops and services in accessible locations which will help to improve quality of life and reduce the need to travel by car in favour of more sustainable modes of transport such as walking, cycling and public transport.

Do-Nothing/Business as Usual Scenario

- 5.68 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.
- 5.69 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

- 5.70 The provision of a network of local and district centres that are accessible on foot is particularly important in Gloucester as rates of car ownership are lower than average.

SAD12 – Cordon Sanitaire

The Policy

- 5.71 The policy defines the boundary of a Cordon Sanitaire around Netheridge Sewage works. Development within the cordon that is likely to be adversely affected by smell will not be permitted.

Overall Findings

- 5.72 The policy is specific both in its subject matter and the area that it covers. It is largely unrelated to the majority of sub-objectives set out in the SA framework. It will however have a positive impact in terms of reducing pollution in the form of odour and ensuring good air quality.

Do-Nothing/Business as Usual Scenario

- 5.73 In not defining a 'cordon sanitaire' boundary around the sewage works, there is a danger that development will take place that would be subjected to unreasonable levels of odour from the works, particularly residential development where occupants could potentially be present 24 hours a day. Despite technological improvements at the works, the closure of Gloucester's other major works at Longford means that the Netheridge works is likely to continue to emit odour particularly at some times of the year.

- 5.74 Removing the cordon boundary and allowing all forms of development within close proximity of the works is likely to give rise to an increase in the number of complaints concerning smell from the works and is not considered to be a desirable option.

Comment/Suggested Changes

- 5.75 The cordon sanitaire boundary plays an important role in ensuring that new development does not suffer unreasonably from problems of odour generated by the works. Severn Trent who operate the works have confirmed that they believe the boundary should be retained. This is a view shared by most people who responded at the Issues and Options stage and is reflected in the preferred option.

SAD13 – Areas of Principal Archaeological Interest

The Policy

- 5.76 The policy seeks to define Areas of Archaeological Interest outside the Central Area. Within these areas, new development will be controlled so as to not harm remains of archaeological importance.

Overall Findings

- 5.77 The policy is relatively specific in its objectives and therefore is unrelated to the majority of objectives set out in the SA matrix. There are no predicted negative impacts. Positive impacts include improving the attraction of Gloucester as a tourist destination and maintaining the City's historical assets.

Do-Nothing/Business as Usual Scenario

- 5.78 Not defining areas of Archaeological Interest would provide less certainty in terms of where new development should have regard to potential remains of archaeological interest. In a worst case scenario, this could lead to important remains being spoiled or lost through new development that does not have appropriate regard to the need to preserve any remains of importance.

Comment/Suggested Changes

- 5.79 None.

SAD14 – Scheduled Ancient Monuments

The Policy

- 5.80 The policy identifies Scheduled Ancient Monuments (or SAMs) within the Central Area. The policy states that there will be a presumption against development on the site of, or in the setting of, a scheduled ancient monument except where this would enhance the character and setting of that monument.

Overall Findings

- 5.81 The policy scores very similarly to Policy SAD13 above as the objectives of the two policies are relatively similar. The same comments therefore apply. Additionally, the policy offers scope for increased participation in cultural activities. Blackfriars Priory for example which is a Scheduled Ancient Monument, will be re-used for cultural activities under the draft policy for the Greater Blackfriars area set out in the Central Area Action Plan Preferred Option consultation paper. There may be other opportunities that come forward outside the Central Area.

Do-Nothing/Business as Usual Scenario

- 5.82 Under this scenario there is a danger that some Scheduled Ancient Monuments may be harmed directly or indirectly by new development (although it is acknowledged that most will be protected by other policies/legislation e.g. Listed Buildings, Conservation Areas).

Comment/Suggested Changes

- 5.83 None.

SAD15 – Bus Priority Routes

The Policy

- 5.84 The policy identifies a number of 'bus priority' routes outside the Central Area. The implementation of bus priority measures such as bus lanes and bus priority at junctions will help to reduce the use of the private car, which is consistent with strategic objectives set out in the Core Strategy DPD.

Overall Findings

- 5.85 The policy performs well in sustainability terms particularly in terms of reducing car use, encouraging sustainable modes of transport and reducing traffic congestion and pollution.
- 5.86 There are no predicted negative impacts.

Do-Nothing/Business as Usual Scenario

- 5.87 Under the do-nothing scenario there is unlikely to be an increase in the use of buses as an alternative to the private car. This has obvious implications in environmental terms. People need to be given an incentive to use alternative modes of transport and bus priority will help to achieve this objective.

Comment/Suggested Changes

- 5.88 Bus Priority is recognised as an important way of increasing the use of public transport. The Gloucestershire Local Transport Plan recognises the potential for bus priority in Gloucester and this is reflected in the preferred option.

SAD16 – Cycle and Pedestrian Routes

The Policy

- 5.89 Strategic cycle routes as identified on the Proposals Map will be safeguarded. Development affecting cycle or pedestrian routes will only be permitted where satisfactory provision is made to retain or divert the existing or proposed cycle or pedestrian route, taking into account the operation, safety, attractiveness or convenience of these routes. Provision for cyclists will also be required in all major developments.

Overall Findings

- 5.90 This policy performs very well in sustainability terms. The policy will reduce and need and desire to use the private car, through the protection and, where appropriate, provision of new pedestrian and cycle links. This will help to increase the permeability of the City, and will help to act as a viable alternative for journeys.
- 5.91 The implementation of this policy may also encourage people to partake in healthy activities, through encouraging people to utilise pedestrian and cycle links for essential journeys but also for recreational purposes.
- 5.92 Other benefits of this policy include the potential for a reduction in traffic congestion, a reduction in atmospheric pollution (carbon dioxide) as a consequence, and therefore reductions in Gloucester's contribution to climate change.

Do/Nothing/Business as Usual Scenario

- 5.93 The omission of this policy would not be in the best interests of sustainable development. Without it there would be potentially be little or no improvement to pedestrian and cycle links on the City. Existing routes may also be disrupted as a result of new development. There would not be a decrease in the desire to use the private car, and the associated benefits, such as improvements to health, and reductions in carbon dioxide emissions, would not happen.

Comment/Suggested Improvements

- 5.94 None.

SAD17 – Static Caravan Sites

The Policy

- 5.95 Policy SAD17 identifies several existing static caravan sites. These will be safeguarded for their current use. Proposals for alternative development will be refused.

Overall Findings

- 5.96 The policy is specific in its objectives and is therefore unrelated to most of the sub-objectives set out in the SA framework. The only predicted impacts are in terms of the provision of an affordable form of accommodation, which may also have a small positive impact in terms of reducing homelessness. There are no predicted negative impacts.

Do-Nothing/Business as Usual Scenario

- 5.97 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

- 5.98 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.

SAD18 – Showmen’s Guild Site, Pool Meadow

The Policy

- 5.99 The policy states that the existing site for travelling showpeople at Pool Meadow will be safeguarded for its current use and alternative development will be refused.

Overall Findings

- 5.100 The policy is unrelated to most of the sub objectives set out in the SA Matrix. There are no predicted negative impacts. In positive terms, the policy will help to ensure the housing needs of the travelling showpeople are met (although there is still a need for new sites (see later). The central location of the site will also help to reduce the need to travel by car and encourage non-car modes of transport including walking and cycling.

Do-Nothing/Business as Usual Scenario

- 5.101 The omission of the policy may lead to pressure for redevelopment of this site which serves an almost unique function in meeting the needs of a particular and long-standing sector of Gloucester's population. This is not considered to be a desirable outcome.

Comment/Suggested Changes

- 5.102 None.

SAD19 – Safeguarded Family Housing – Barton and Tredworth

The Policy

- 5.103 Policy SAD19 relates to a particular part of Barton and Tredworth within which family housing will be safeguarded. Proposals for the sub-division of family accommodation into smaller dwellings through subdivision and conversion will not be permitted. New housing proposals within this area will be required to include a mix of accommodation including housing suitable for families. Proposals to redevelop existing residential dwellings or groups of dwellings shall replace, like for like, any existing family housing lost through demolition.

Overall Findings

- 5.104 The policy scores well in sustainability terms. In negative terms, arguably, in seeking to encourage more family accommodation, this may contribute to less efficient use of land being made than would be the case with smaller residential units. This however needs to be offset against the provision of a range of accommodation types in the interest of creating mixed and balanced communities.
- 5.105 Positive impacts are likely to include the provision of housing for everyone (i.e. suitable for all types and groups of people) improved community cohesion by providing a mix of dwelling types and improving the quality of where people live.

Do-Nothing/Business as Usual Scenario

- 5.106 The business as usual scenario is that existing housing suitable for families continues to come under pressure for redevelopment or conversion to smaller units and that new development provides only for smaller household sizes including single person households.
- 5.107 This is likely to lead to an imbalance of housing types being provided in this area and a lack of community cohesion.

Comment/Suggested Changes

- 5.108 The provision of housing suitable for families is a key issue, which has been raised in consultation on the LDF to date.

SITE ALLOCATIONS

SAD20 – Kingsholm Rugby Club

The Policy

- 5.109 Policy SAD20 seeks to allocate Kingsholm Rugby Club for residential development of up to 100 dwellings on the basis that, should a new stadium come forward on the Railway Triangle, the current site would be surplus to the club's requirements. The site was previously allocated in the draft Local Plan (2001).

Overall Findings

- 5.110 The majority of impacts are considered as long-term on the basis that the availability of the site for housing will depend on the relocation of the club to an alternative site such as the railway triangle.
- 5.111 In positive terms, the site scores very well in reducing the need/desire for car travel. The site is within walking distance from the city centre and there are several bus services running past the site into the main shopping area. The railway station is located close to the city centre.
- 5.112 The site scores well concerning the re-use of previously used land and encouraging the most efficient use of land and provides an opportunity to contribute towards citywide affordable housing numbers.
- 5.113 The site scores well in providing good access to local services and facilities. It is within walking distance of the city centre, post office and a local primary and secondary school.
- 5.114 The site is located within the floodplain but this is not considered to be a significant constraint to development. The policy specifies the need for a Flood Risk Appraisal as part of any application.

Do-Nothing/Business as Usual Scenario

- 5.115 The do-nothing scenario depends on whether the rugby club, relocate to another site or not. If they do decide to relocate it is likely that they would have to sell the existing ground to fund the relocation. If this happened, it is likely that a high value scheme such as residential or retail would be promoted. The site is not considered to be suitable for retail development as it is located outside the Primary Shopping Area.

- 5.116 If the club decides to remain in situ, the do-nothing scenario is that the site remains in its current use.

Comment/Suggested Changes

- 5.117 The policy could be amended to refer to the need for on-site renewable energy generation.

SAD21 – Clifton Road Triangle

The Policy

- 5.118 The policy seeks to allocate land at Clifton Road for residential development of up to 65 dwellings.

Overall Findings

- 5.119 The site is centrally located on a vacant brownfield site. The development of this site will have a direct and positive impact in terms of reducing the amount of derelict and underused land in Gloucester. It also provides an opportunity to contribute towards citywide affordable housing numbers.
- 5.120 Redevelopment of the site for housing will represent much more efficient use of the site than is the case at present.
- 5.121 The site also scores very well in reducing the need/desire for car travel. The site is within walking distance from the city centre. The locality of the site encourages the use of alternative means of transport i.e. public bus service, cycling and walking.
- 5.122 The site will however cause the displacement of the current on-site uses which would lead to a small loss of existing employment opportunities. Overall however the sustainability gains are considered to outweigh this impact. It may also be possible to build on just part of the allocation with the existing occupants remaining in situ. This will however reduce the possibility of a quality comprehensive scheme coming forward.

Do-Nothing/Business as Usual Scenario

- 5.123 The do-nothing scenario is that the site continues to remain vacant and in its current state. This is not considered to be a desirable scenario. The site is unattractive and unkempt and provides the opportunity to make a useful contribution towards meeting the City's housing requirements whilst significantly improving the appearance of this prominent site.
- 5.124 There may be speculative planning applications for other uses on the site as has been the case recently. These would have to be considered on their merits based on relevant policies.

Comment/Suggested Changes

- 5.125 The policy could be expanded to include a requirement to make provision for renewable energy.

SAD22 – Land at Clearwater Drive

The Policy

- 5.126 Policy SAD22 seeks to allocate land at Clearwater Drive for public open space and limited residential development of up to 30 dwellings.

Overall Findings

- 5.127 The site is partly located within the floodplain although it is in Zone 2 which is only moderate risk. Furthermore the area proposed for residential development is not in the floodplain. Any development would need to carefully consider and address the issue of flood risk.
- 5.128 The site is also greenfield rather than previously developed or 'brownfield'. There will some increase in generation of waste and the consumption of raw materials and water although given the scale of proposed development, these impacts will be negligible.
- 5.129 In positive terms, the allocation offers the potential to protect the nature conservation interests of the site whilst ensuring the accessibility of it to the public for recreational use as public open space.
- 5.130 Natural habitat will be safeguarded and species diversity positively encouraged. The development would represent more efficient use of the land than is the case at present, whilst retaining the use of the site for recreation.
- 5.131 Use of the site for recreational purposes will have secondary benefits in terms of the ability of local residents to engage in healthy activity.
- 5.132 The location of the site and its proximity to Quedgeley District Centre means that walking and cycling are realistic options. There are also a number of local bus services operating in the area. This should help to reduce the need/desire to travel by car although clearly some trips will still need to be made.
- 5.133 The location of the site also means that there are schools and health care facilities within walking distance.

Do-Nothing/Business as Usual Scenario

- 5.134 The do-nothing scenario is that a speculative application comes forward for residential development on the majority of the site. The allocation of the site puts the Council in a much stronger position to secure limited development with the remainder of the site laid out as public open space.

Comment/Suggested Changes

- 5.135 Amend policy to refer to the need for a Flood Risk Assessment as part of any development proposal.

SAD23 – Mayo's Land

The Policy

- 5.136 The policy allocates land between the A38 and Waterwells Business Park (known as 'Mayo's Land') for residential development of up to 70 dwellings in the period post 2013. This phased approach is to allow brownfield sites in the Central Area to come forward as a priority.

Overall Findings

- 5.137 All impacts are considered to be long-term given the phased approach to development specified in the policy.
- 5.138 In negative terms the proposal will lead to the loss of a greenfield site with a consequent loss of natural habitat and species diversity. The site is not however recognised as being of particular importance in nature conservation terms.
- 5.139 Although the site is located away from the town centre, its close proximity to the Quedgeley District Centre gives relatively good access to local shops services and services. The site therefore scores reasonably well in terms of reducing the need to travel by car. It is located near to one of Gloucester's park and ride schemes and in close proximity a main bus route and cycle route.
- 5.140 Redevelopment of the site for housing provides the opportunity to make more efficient use of the site than is the case at present. New residential development of the scale proposed will also attract the provision of new public open space as part of the development.

Do-Nothing/Business as Usual Scenario

- 5.141 It is unlikely that this site will remain in its current state. There is known developer interest and land to the south has been promoted through the Stroud Local Plan. If the site is not allocated on a phased basis there is a prospect of a speculative planning application being submitted in the short-term. At present, the site is not needed to meet the City's housing requirements.

Comment/Suggested Changes

- 5.142 The policy could refer to the need for 10% on-site renewable energy generation.

SAD24 – Former Oil Storage Depot, Hempsted Lane

The Policy

- 5.143 Policy SAD24 allocates land at the former oil depot, hempsted for limited residential development of up to 30 dwellings.

Overall Findings

- 5.144 The allocation of the site for housing performs reasonably well in sustainability terms when assessed using the SA matrix. It provides the opportunity to make more efficient use of a under-used derelict site which comprises predominantly brownfield land (although parts of the site have regenerated naturally and have become more greenfield in character).
- 5.145 The location of the site means it is relatively accessible to a range of shops and services which should in turn help to reduce car use and encourage more sustainable modes of transport.
- 5.146 The allocation will attract a small proportion of new affordable housing. The development of the site offers the opportunity to improve soil quality through the decontamination of any pollution that may be present on site.
- 5.147 In general terms, the visual improvements to the site arising from residential development are likely to improve the quality of the site for local residents.

Do-Nothing/Business as Usual Scenario

- 5.148 There is known developer interest in the site and it is likely that a speculative planning application would be submitted irrespective of the LDF allocation. There is a danger that such an application would seek to increase the number of dwellings proposed and to utilise the whole site rather than just part as is envisaged in the policy.
- 5.149 This would lead to the erosion of an area of Landscape Conservation Importance and is not considered to be a sustainable, desirable scenario.

Comment/Suggested Changes

- 5.150 None.

SAD25 – Land at Leven Close and Paygrove Lane

The Policy

- 5.151 Policy SAD25 seeks to allocate land at Leven Close for limited residential development of up to 15 dwellings with the rest of the site laid out as public open space. Paygrove Lane is allocated as a Neighbourhood Park.

Overall Findings

- 5.152 The policy scores well in sustainability terms. It will for example help to conserve existing natural habitats by seeking to ensure that the majority of the site is retained as public open space.
- 5.153 The maintenance of this public open space will have a number of positive benefits including improved ability for people to involve themselves in healthy activity, greater community cohesion and involvement in community activities.
- 5.154 Although the sites are Greenfield, the scale of proposed built development is minimal and this will help to reduce the level of impact.
- 5.155 In seeking to permit residential development, the policy seeks to secure the remainder of the sites for use as public open space. This will have a number of benefits.
- 5.156 The sites are well located in respect of the Local Centre on Cheltenham Road which will help to reduce the need to travel by car.

Do-Nothing/Business as Usual Scenario

- 5.157 There are two main do-nothing scenarios. The County Council may simply retain the sites in their current form with no formal public access arrangements or they may choose to submit a speculative planning application. This may involve the loss of a greater portion of the Leven Close site and the loss of some of the Paygrove Lane site. This is not considered to be a sustainable outcome. The preferred option proposal strikes a balance between the provision of a limited number of new homes on a Greenfield site with the majority of the site being secured for use by the general public.

Comment/Suggested Changes

- 5.158 None.

SAD26 – Land at Hammond Way, Barnwood

The Policy

- 5.159 Policy SAD26 allocates a relatively small parcel of land off Hammond Way in Barnwood for residential development of 10 dwellings. The site consists of an area of surplus car parking owned by EON Plc UK. The site is located in a predominantly residential area.

Overall Findings

- 5.160 The scale of proposed development means that the predicted impacts of this draft allocation are relatively modest. They are however predominantly positive impacts showing that the site is a sustainable development opportunity.

- 5.161 The site comprises previously developed land and is not affected by any particular development constraints although access onto Barnwood Road will have to be considered carefully.
- 5.162 There would therefore be no loss of natural habitat, biodiversity or nature conservation interest. The proposal represents efficient use of a brownfield site that is considered surplus to requirements.
- 5.163 The location of the site means that despite it being on the relative fringe of the City, it is still very accessible for shops and essential services. This should help to reduce car use and promote walking and cycling in particular.

Do-Nothing/Business as Usual Scenario

- 5.164 The business as usual scenario is not significant. The site may remain in its current use which could be considered to represent a wasted and under used resource. Alternatively a speculative planning application may be submitted. This would need to be considered on its merits.

Comment/Suggested Changes

- 5.165 The policy could be amended to refer to the need for a Transport Assessment in order to determine the impact of additional car movements on the local road network particularly Barnwood Road.

SAD27 – Blackbridge Allotments off Stroud Road

The Policy

- 5.166 Policy SAD27 allocates land off Stroud Road currently used in part for allotments, for mixed use development including limited housing, a new GP surgery, community building/s and allotments.

Overall Findings

- 5.167 The policy scores well in sustainability terms when assessed using the SA Matrix. The provision of a new community building will help to encourage community activities and promote community cohesion, whilst the provision of a new GP surgery will improve the ability of existing and future residents to access health care facilities.
- 5.168 In retaining some allotments on the site, this will maintain the ability of people to engage in this healthy form of passive recreation.
- 5.169 The site is relatively accessible by non-car modes of transport. Stroud Road is a designated cycle route and there are seven bus services using Stroud Road that serve the City Centre, Quedgelely, Tuffley and Stroud.

Do-Nothing/Business as Usual Scenario

- 5.170 The business as usual scenario is that the sites remain in their current state. They are essentially under-used as an allotment site and this situation is likely to continue to worsen. There will be missed opportunities to provide considerable benefit to the local community whilst retaining a smaller number of potentially better-used allotments on the site.

Comment/Suggested Changes

- 5.171 None.

SAD28 – Norville Site, Tarrington Road

The Policy

- 5.172 Policy SAD28 allocates the existing Norville Optician site on Tarrington Road for mixed-use residential and employment development. The draft policy envisages 30 dwellings with 2,500 sq. m of office and or light industrial floorspace.

Overall Findings

- 5.173 The site scores well concerning the re-use of previously used land and encouraging the most efficient use of land and provides an opportunity to contribute towards citywide affordable housing numbers.
- 5.174 The site is within walking distance of local shops, services, local schools and public open space. The site is close to public transport routes and therefore reduced the need/desire for using a car.
- 5.175 The mixed-use allocation will retain job opportunities in this sustainable location.

Do-Nothing/Business as Usual Scenario

- 5.176 There is known developer interest in the site as the current owners have marketed the property with the intention of consolidating their activities onto their other site at Magdala Road. The omission of the policy would however place the Council in a weaker position to argue for a mixed use scheme. A solely residential scheme would result in the loss of job opportunities in a sustainable location and is not considered to be as sustainable an option as the mixed use draft allocation.

Comment/Suggested Changes

- 5.177 None.

SAD29 - Land at the Junction of Barnwood Road and Bypass

The Policy

- 5.178 The policy allocates land at the junction of Barnwood Road and Bypass for mixed use development including employment, limited residential (15 dwellings) and a new local shopping centre. The allocation has been carried through from the Deposit Draft Local Plan (2002). A number of planning applications have been submitted for the redevelopment of this area although a permission has not yet been secured for various reasons.

Overall Findings

- 5.179 The policy performs well in sustainability terms. The provision of new employment floorspace will for example help to create additional job opportunities, which may in turn help to attract additional inward and local investment.
- 5.180 The site is an underused parcel of previously developed land and buildings and the draft proposals will make much more efficient use of the site than is the case at present.
- 5.181 The provision of a new local shopping centre provides the opportunity to increase accessibility and to act as a focal point in the interests of improving community cohesion.
- 5.182 The site is reasonably accessible by a choice of non-car modes of transport which should help to reduce car use. There is also the opportunity for reduced perception and occurrence of crime through the redevelopment of some vacant buildings which presently can create some problems.
- 5.183 There will be some small negative impacts associated with the generation of waste and the consumption of raw materials and water although the scale of development means that impact in these regards will be relatively limited.

Do-Nothing/Business as Usual Scenario

- 5.184 There is known developer interest in this site, indeed a planning application was recently withdrawn. The implications are therefore that a scheme will be submitted regardless of the LDF. The omission of the policy would however potentially lead to a less acceptable mix of uses with, for example, a greater proportion of housing. This would not necessarily be in the interests of encouraging balanced provision of new housing and employment opportunities.

Comment/Suggested Changes

- 5.185 For clarity the policy could specify the type and scale of shops envisaged as part of the proposed local shopping centre.

SAD30 – Former B&Q site, Trier Way

The Policy

- 5.186 Policy SAD30 allocates the former B&Q site for mixed-use development including residential, offices and a limited amount of new retail floorspace.

Overall Findings

- 5.187 The proposed mixed use allocation of this site scores well in sustainability terms. The site comprises previously developed land and the proposals offer the opportunity to put it to much more efficient use through high quality mixed use development.
- 5.188 The provision of small scale retail development along Barton Street provides the opportunity to enhance the vitality and viability of the Local Centre which has struggled in recent years.
- 5.189 The location of the site just outside the Central Area means that walking, cycling and public transport are realistic options. This should help to reduce reliance on the private car.
- 5.190 The provision of new housing will increase the supply of affordable dwellings and the provision of new employment and retail floorspace will create a good number of additional job opportunities in an area of relatively high unemployment.

Do-Nothing/Business as Usual Scenario

- 5.191 The site could be reoccupied by another bulky goods retailer in which case there would be no discernible impact. It is also possible that proposals for further retail development on the site could come forward. This would however create the potential to undermine the delivery of new retail floorspace at the bus station which is the Council's preferred site as set out in the draft Central Area Action Plan.

Comment/Suggested Changes

SAD31 – Land East of Waterwells Business Park

The Policy

- 5.192 The policy allocates land to the east of Waterwells for the creation of new B1 office and light industrial floorspace as well as the provision of a new residential site for the travelling showpeople of Gloucester.

Overall Findings

- 5.193 The policy has a number of potential negative impacts including the loss of some natural habitat through the loss of a Greenfield site as well as potential increases in waste generation and water consumption.
- 5.194 However, these are considered to be outweighed by the potential positive impacts of the policy which include in particular the creation of additional job opportunities and the attraction of inward and local investment.
- 5.195 It will also help to meet the specific housing needs of the showmen's guild. The site is relatively accessible by non-car modes of transport including park and ride.

Do-Nothing/Business as Usual Scenario

- 5.196 The omission of the policy will reduce the probability of a large area of Greenfield land coming forward for employment development. It would also mean that the site is unlikely to come forward as a site for the travelling show people.

Comment/Suggested Changes

- 5.197 None.

SAD32 – South West Bypass Site

The Policy

- 5.198 Policy SAD32 allocates land off the south west bypass for B1 office and/or light industrial development. The allocation has been carried through from the Draft Local Plan (2002).

Overall Findings

- 5.199 Overall, the policy scores well against the SA matrix although its location may reduce options for non-car modes of transport compared to some sites. In positive terms, the creation of additional B1 floorspace will provide new job opportunities and may help to stimulate investment. Depending on the nature of the floorspace provided, there may be opportunities for small local companies to benefit.
- 5.200 Potentially new B1 uses may also offer job based training opportunities for people e.g. apprenticeships, although this is difficult to predict with any degree of certainty.

- 5.201 The site is potentially contaminated and if this is the case, the allocation will ensure that any on-site pollution is removed as a result of the development coming forward.

Do-Nothing/Business as Usual Scenario

- 5.202 It is possible that the site will remain in its current state and make no contribution to meeting the economic needs of the City. Alternatively there may be pressure for other forms of development, which would effectively represent a missed opportunity to provide quality employment floorspace in a prominent, accessible location.

Comment/Suggested Changes

- 5.203 None.

SAD33 – IM Group Site, North of Naas Lane

The Policy

- 5.204 Policy SAD33 allocates the IM Group site at Naas Lane for B1 office and light industrial development and B8 storage and warehousing. This allocation has been carried through from the draft Local Plan although it has been extended from B8 to B1 and B8 uses due to the fact that the rail freight depot proposal is unlikely to come forward now.

Overall Findings

- 5.205 The site performs similarly to the South West Bypass site referred to above. Particular positive benefits include the provision of new employment floorspace which not only would represent more efficient use of the site through increased density of development, but would also provide new job opportunities and help to stimulate investment.

Do-Nothing/Business as Usual Scenario

- 5.206 The site is likely to remain in its current use. This would represent a missed opportunity to make more effective use of the site in terms of the density of development and the potential to provide additional employment floorspace to meet the economic needs of the City.
- 5.207 There may also be pressure for residential development. The site has been promoted by the owners as a housing objection site at the Issues and Options stage and this may be pursued further. It is however important to balance housing and employment provision and the site is not needed to meet housing requirements, whilst it is needed to meet the City's economic needs as an extension to Waterwells the principal business park.

Comment/Suggested Changes

5.208 None.

SAD34 - Land south of the Junction between Eastern Avenue and Barnwood Road

The Policy

5.209 The policy allocates land south of the junction between Eastern Avenue and Barnwood Road for employment use (B1 office and/or light industrial). This allocation has been carried through from the Deposit Draft Local Plan.

Overall Findings

5.210 The policy performs well in sustainability terms. The site comprises previously developed land and is accessible by a choice of non-car modes of transport. The provision of a landmark building will significantly improve the visual appearance of this site.

5.211 The provision of additional employment floorspace will provide an increase in the number of job opportunities available. The site is potentially contaminated and the proposal would provide the opportunity to remove any ground pollution that may be present.

Do-Nothing/Business as Usual Scenario

5.212 The do-nothing scenario is that the site is likely to remain in its current state. Should a speculative application for non-employment use be received, this would need to be considered on its merits.

Comment/Suggested Changes

5.213 None.

SAD35 – Land adjacent to Walls Factory, Barnwood

The Policy

5.214 Policy SAD35 allocates land adjacent to the Walls Factory at Barnwood for B1 office and light industrial development. This site has previously been reserved by Walls for potential expansion of their operations.

Overall Findings

5.215 The performance of this site in sustainability terms is very similar to the IM group site discussed above. It is a large site and the opportunity exists to provide a significant amount of new employment floorspace which will have major benefits in terms of job creation.

- 5.216 The policy requires the provision of a link to the proposed bus link from the parkway station at Elmbridge. Although the timing of this depends on the station, such a link would serve to increase the accessibility of the site by public transport. The need for the link is stipulated in the policy.

Do-Nothing/Business as Usual Scenario

- 5.217 The site is likely to remain in its current state representing an underused potential asset in employment terms. There may be pressure for other forms of development such as commercial leisure and retail due to the prominent location of the site in relation to the A40. This is not however considered to be an appropriate location for such uses which, as major generators of travel, should be steered towards the City Centre.

Comment/Suggested Changes

- 5.218 Given the scale of potential development, the policy should specify a need for 10% on-site renewable energy generation.

SAD36 – Extension to Quedgeley District Centre

The Policy

- 5.219 The policy allocates land to the west of Tesco Petrol Filling Station in order to allow for the extension of Quedgeley District Centre.

Overall Findings

- 5.220 The principle of extending QDC scores well in sustainability terms. Although the site is Greenfield, the potential provision of additional shops and services within the District Centre as proposed to be extended, will help to maintain the vitality and viability of the Centre and will also reduce the need for people to travel unnecessarily by car to other locations to reach shops or services they would otherwise be unable to access to QDC.
- 5.221 The provision of better facilities is also likely to improve the quality of life of people who live in the locality and use the District Centre on a regular basis.

Do-Nothing/Business as Usual Scenario

- 5.222 The do-nothing scenario is that the site remains in its current state. This would represent a missed opportunity to strengthen the role and vitality of Quedgeley District Centre. This is not considered to be a desirable scenario. The site may also come under pressure from alternative forms of development that would not yield the same sustainability benefits as an extension of the District Centre.

Comment/Suggested Changes

- 5.223 The policy could be strengthened to state that proposals for other forms of development not associated with the extension of QDC will not be permitted.

SAD37 – Town Ham Allotments

The Policy

- 5.224 The policy allocates Town Ham allotments for an extension of the existing Showmen’s Guild site at Pool Meadow subject to the issue of contamination and ground conditions being resolved. If these issues can’t be resolved the site shall revert to public open space.

Overall Findings

- 5.225 The policy scores well in sustainability terms. It would for example help to bring a new use to a degraded and under-used parcel of land and in the process would require the removal of contamination that may be present with a subsequent improvement in ground conditions.
- 5.226 The location of the site means that it is relatively accessible by a range of non-car modes of transport. This should help to reduce the need/desire to travel by car.
- 5.227 Potentially if the site is not used for an extension of the showmen’s guild site it will be used as public open space which will have benefits in terms of providing opportunities for passive recreation.
- 5.228 Importantly the proposal will meet the specific housing needs of the Showmen’s Guild.

Do-Nothing/Business as Usual Scenario

- 5.229 Omitting the policy would mean less opportunity to meet the needs of the showmen’s guild for additional accommodation. The site is likely to remain in its current state and there will be no opportunity to remove the contamination that affects the site.

Comment/Suggested Changes

- 5.230 None.

SAD38 – New Community Facilities

The Policy

- 5.231 This policy allocates a number of sites for community uses, including new community buildings, a school, a police station and a library.

Overall Findings

- 5.232 This policy performs very well in sustainability terms. In particular, it contributes towards ensuring that everybody has access to basic essential services, contributes towards an improvement in learning and knowledge (through schools and libraries), and contributes towards the creation sustainable and inclusive communities and therefore community cohesion (for example through community buildings for community events).

Do/Nothing/Business as Usual Scenario

- 5.233 The omission of these policies would not be in the interests of sustainable development. The allocation of these sites for community facilities are essential for local community, and a lack of them would be detrimental to the local community.

Comments/Suggested Changes

- 5.234 None.

6. CONCLUSION & NEXT STEPS

- 6.1 The appraisal process has demonstrated that the preferred options set out in the consultation paper are consistent with the key objectives of sustainable development.
- 6.2 It has also served to identify where improvements can be made in order to make potential policies and proposals more sustainable.
- 6.3 In all cases, the preferred policy options have been preferable to the do-nothing or business as usual scenario.
- 6.4 The matrix attached at Appendix 2 identifies in full any potentially significant impacts and their likely duration.
- 6.5 Responses to this appraisal document will be taken into account along with those we receive in response to the Preferred Option Site Allocations and Designation Document.
- 6.6 These will be reported to Council who will agree a final draft submission version of the document likely to be published in March 2007. A final sustainability report will be published at that time.

SCHEDULE OF BASELINE INFORMATION AND INDICATORS

The following table sets out for each sustainability appraisal sub-objective, a range of relevant baseline data and indicators. Setting these out in a single schedule avoids the need to repeat the information throughout the appraisal, which helps to reduce the length of the report.

SA Objectives	Baseline Information	Indicator/s
1. To protect the City's most vulnerable assets		
1.a. Will it minimise the risk of flooding to people and property?	13.3 % of Gloucester lies within the floodplain.	Numbers of people and properties affected by flood events
1.b. Will it conserve and enhance natural/semi-natural habitats?	As well as designated sites of importance, the City also has a network of non-designated greenspaces that provide important corridors, buffers and stepping-stones between designated sites of importance.	Access to woodland Health of designated Sites of Special Scientific Interest
1.c. Will it conserve and enhance species diversity and in particular, avoid harm to protected species?	There are six key wildlife sites designated by Gloucester Wildlife Trust and 28 other sites of Nature Conservation Interest.	Achievement of Relevant (Urban Habitat) BAP targets Populations of wild birds
1.d. Will it maintain and enhance sites designated for their nature conservation interest?	The city has two Sites of Special Scientific Interest (SSSI's); Hucclecote Meadows in Abbeymead and Robinswood Hill Quarry on Robinswood Hill. There are also five local nature reserve designations.	Health of designated Sites of Special Scientific Interest
1.e. Will it maintain and enhance cultural and historical assets?	The city has 707 Listed Buildings, of which 13% are Grade I or II* and of outstanding architectural or historic interest. The equivalent figure for the whole of England is about 6%.	-
1.f. Will it maintain and enhance woodland cover?	There is an area of ancient woodland at Matson Wood although overall, woodland provision is limited given the urban nature of the City.	Access to woodland

SA Objectives	Baseline Information	Indicator/s
2. To Deliver Sustainable Economic Growth		
2.a. Will it create new and lasting full time jobs particularly for those most in need of employment?	Although the unemployment rate in Gloucester has fallen from 6% to 3% between 1997 and 2002, it is still the highest rate in Gloucestershire. The wards with the highest rates of unemployment in 2003 were Westgate (11.9%), Matson (8.8%), and Barton (7.7%). Unemployment double among Gloucester's black and minority ethnic communities.	Percentage increase/decrease in the total number of local jobs. Employment rates white/non-white
2.b. Will it encourage both indigenous and inward investment?	In Gloucester in 2002 there were 255 VAT registrations in total. However, there were also 345 VAT de-registrations, representing a net decrease of 90 businesses in Gloucester in that year.	Number of economic development enquiries Amount of land developed for employment, by type, which is in development and/or regeneration areas defined in the LDF
2.c. Will it help to support and encourage the growth of small businesses?	Figures gathered between 1997 and 2002 showed that the number of VAT registrations (i.e. business start ups) was 1,690.	Percentage change in the total number of VAT registered businesses in the area Percentage change in number of small companies (i.e. less than 5 employees)
2.d. Will it help to improve the attraction of Gloucester as a tourist destination?	In 2002 Gloucester attracted: In 2002 Gloucester attracted 315,000 trips by staying visitors 914,000 staying visitor nights	Number of visitors per annum Amount of visitor spend

SA Objectives	Baseline Information	Indicator/s
3. To minimise consumption of natural resources and production of waste		
3.a. Will it encourage the most efficient use of land and buildings?	Between 1st April 2004 and 31st March 2005 new dwelling completions in Gloucester were at the following densities: 15.3% at 30 dwellings per hectare or less 36.0% at 30 – 50 dwellings per hectare 48.7% at 50+ dwellings per hectare	Percentage of new dwellings completed at: Less than 30 dwellings per hectare Between 30 and 50 dwellings per hectare; and Above 50 dwellings per hectare
3.b. Will it encourage development on previously developed land?	Between 1 st April 2004 and 31 st March 2005 the percentage of new homes built on previously developed land was 443 representing 80% of the total number of new homes built.	Percentage of all new development on previously used land Percentage of land developed for employment, by type, which is on previously developed land
3.c. Will it minimise the demand for raw materials and/or encourage the use of raw materials from sustainable sources?	Gloucester City Councils Home Energy Conservation Act (1995) improvement figure for 1st April 2003 – 31 March 2004 was 3.8% - this represents an estimated energy saving of 264,867 Giga Joules (GJ).	Percentage of all new development on previously used land Improvements in energy efficiency Total amount of energy supplied from renewable energy sources
3.d. Will it increase waste recovery and recycling?	In 2003/2004 the amount of household waste and composting in Gloucester amounted to 9.72% of all household waste in the City. This was substantially lower than the rate for both the County and the National Averages, which were 20.87 % and 22.49 % respectively.	Overall satisfaction with provision for recycling Recycling of household waste
3.e. Will it help to reduce the amount of waste that is generated?	2003/2004 – 492kg waste produced per head in Gloucester 2004/2005 – 511kg waste produced per head in Gloucester	Waste produced per head (BVPI 84)
3.f. Will it positively encourage renewable forms of energy?	Gloucester City Councils Home Energy Conservation Act (1995) improvement figure for 1st April 2003 – 31 March 2004 was 3.8% - this represents an estimated energy saving of 264,867 Giga Joules (GJ).	Total amount of energy supplied from renewable energy sources Renewable energy capacity installed by type

3.g. Will it reduce water consumption?	-	Water consumption per head
SA Objectives	Baseline Information	Indicator/s
4. To ensure everyone has access to the essential services they require and that local needs are met		
4.a Will it help everyone access essential basic services easily, safely and affordably?	There are ten designated Local Centres providing a range of local-scale shops and services such as smaller supermarkets, post offices, hair salons and so on.	Percentage of residents surveyed finding it easy to access key local services Percentage of new residential development within a distance of 500m or 15 minute walk of key local services (post office, food shops, GP, primary school)
4.b. Will it help disabled people access services and facilities more easily?	These ten local centres provide important facilities for less mobile members of society and allow shopping trips to take place without the need for a journey by car or public transport.	Percentage of new residential development within a distance of 500m or 15 minute walk of key local services (post office, food shops, GP, primary school)
4.c. Will it make access easier for those without a car?	-	Percentage of residents surveyed finding it easy to access key local services Percentage of new residential development within a distance of 500m or 15 minute walk of key local services (post office, food shops, GP, primary school)
4.d. Will it provide additional leisure facilities, green spaces and improve access to existing facilities?	The City Council's current Public Open Space standard aims to ensure that there is 2.8 hectares (7 acres) open space per 1,000 residents. At the time of the most recent Public Open Space survey carried out in 2001, the proportion of open space available to Gloucester residents (not including the Riverside Meadows or Robinswood Hill) was 2.19 hectares per 1,000 population.	Access to local green space Cumulative total number of open spaces managed to 'green flag' award standard Satisfaction with sports and leisure facilities
4.e. Will it help to ensure that everyone has access to safe and affordable housing?	In Gloucester in 2003, the affordable housing ratio, that is, the number of average salaries per average house price for males was 5.07, against a County ratio of 6.63, and southwest ratio of 6.72. Between 1 st April 2004 and 31 st March 2005 there were 68 affordable housing completions in Gloucester.	Affordable housing (house price/earnings affordability ratio) Affordable housing completions

4.f. Will it reduce homelessness?	Homelessness is an issue within the City with a Housing Needs survey in 2003 identifying 436 households requiring accommodation.	Number of homelessness applications per quarter.
SA Objectives	Baseline Information	Indicator/s
5. To improve standards of health and education		
5.a. Will it improve health and people's ability to engage in healthy activities?	Overall, 8.6% of people in Gloucester have poor general health, compared to 7.6% for the County and 9.2% for England and Wales.	Expected years of healthy life Death rates from cancer, circulatory disease, accidents and suicides
5.b. Will it improve access to health care facilities?	-	GP appointments made within 48 hours where desired. Percentage of residents who feel that health services have improved.
5.c. Will it reduce inequalities in health by improving the health of the least healthy people?	In 2003 the number of people suffering from Circulatory Diseases in Gloucester was noticeably higher than in the County and England and Wales as a whole, with 113.27, 88.52, and 106.30 cases per 100,000 population under 75 respectively.	Death rates from cancer, circulatory disease, accidents and suicides.
5.d. Will it improve access to learning, training, skills and knowledge?	-	Percentage of adults participating in LSC funded learning.
5.e. Will it improve qualifications and skills of young people and adults?	In Gloucester, 27.9% of people have no qualifications, compared with 24.9% for the County, and 29.1% for England and Wales. Gloucester has more people without qualifications when compared to the County in all age groups (20 – 24, 25 – 44, 45-64, 65 – 74).	% 16 – 19 year olds with no qualifications. Qualifications/skills – percentage of working age population (16-54/59) with qualifications to either NVQ level 1 or 2/equivalent, NVQ level 3 or 4 or a trade apprenticeship or with no formal qualifications.

SA Objectives	Baseline Information	Indicator/s
6. To make Gloucester a great place to live and work		
6.a. Will it help to reduce crime and the fear of crime?	<p>During 2004 the number of crimes committed by 10 – 17 year olds was 114.02 per 1,000 population. This is substantially higher than the figure for the County, which is 69.08 per 1,000 population.</p> <p>In 2004 85.60% of people in Gloucester felt safe in daylight in their neighbourhood, compared with 90.30% of County residents.</p>	<p>Domestic burglaries per 1,000 households.</p> <p>Violent offences committed per 1,000 population.</p> <p>Percentage of residents surveyed who feel 'fairly safe' or 'very safe' after dark whilst outside in their local authority area (b) Percentage of residents surveyed who feel 'fairly safe' or 'very safe' during the day whilst outside in their local authority area.</p>
6.b. Will it encourage community engagement in community activities?	As of June 2005, there are 391 voluntary organisation in the City that are known to Gloucester City Council.	<p>Percentage of residents who feel community activities have improved in the last three years.</p> <p>Number of voluntary organisations.</p> <p>Number of neighbourhood partnerships.</p>
6.c. Will it increase the ability of people to influence decisions?	<p>In 2004, the following percentages of people in social housing in Gloucester were satisfied with the opportunities for participation in management and decision-making with their landlord:</p> <p>Very satisfied – 12.9% Fairly satisfied – 48.4% Neither – 16.1% Fairly dissatisfied – 22.6% Very dissatisfied – 0%</p>	<p>Percentage of adults surveyed who feel they can influence decisions affecting their local area.</p> <p>Tenant satisfaction & participation</p>
6.d. Will it improve community cohesion?	<p>A survey was carried out in 2003 that asked 52 community and voluntary sector organisations a number of questions regarding perceptions of community cohesion.</p> <p>Overall, 83.3% of people thought that Gloucester was a place where people from different backgrounds get on well together.</p>	Percentage of people who feel that their local area is a place where people from different backgrounds and communities can live together harmoniously.

6.e. Will it help to maintain and/or enhance the vitality and viability of a designated centre?	Gloucester has an assumed shopper population of 190,500 (derived from CBRE using NSLSP data), which ranks it at 74 in CB Richard Ellis' Rank of Shopper Populations.	Vacancy rates within the Primary Shopping Area Percentage change in the number of registered restaurants in the City Centre and other designated centres
6.f. Will it increase access to and participation in, cultural activities?	-	-
6.g. Will it reduce poverty and income inequality?	Gloucester suffers from higher levels of poverty and deprivation than any other District in Gloucestershire. Two of the City's, Barton, and Tredworth and Westgate, are included within the list of the 10% of most deprived wards in the Country. Another four are included within the list for the 25% of most deprived wards.	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country. Percentage of population of working age who are claiming key benefits. Proportion of households with an income of less than 50% of the national average.
6.h. Will it reduce the number of unfit homes?	In 2004, around 3,830 dwellings were classified as 'unfit' to live in – all of which were private sector dwellings.	Number of 'unfit' homes per 1,000 dwellings
6.i. Will it improve the quality of where people live?	-	Percentage of residents who are satisfied with their neighbourhood as a place to live. Percentage of residents who feel Gloucester has improved or is improving.

SA Objectives	Baseline Information	Indicator/s
7. To reduce the need to travel		
7.a. Will it reduce the need/desire to travel by car?	<p>In 2003, the largest mode of transport used to take children to school was the private car, constituting 45% of journeys to Primary School, and 41% of journeys to Secondary Schools.</p> <p>By far the most popular mode of transport for travelling to work in 2001 is the private car with 31,590 Gloucester residents using it.</p>	Passenger travel by modes.
7.b. Will it help ensure that alternatives to the car are available for essential journeys, especially to residents in areas of low car ownership?	<p>Gloucester currently has two dedicated park and ride sites at The Cattle Market and Waterwells.</p> <p>Between 1st April 2004 and 31st March 2005, ten travel plans were secured in Gloucester.</p>	<p>Number of park and ride users.</p> <p>Percentage of residents surveyed who feel that public transport has improved.</p>
7.c. Will it help to achieve a reduction in road accident casualties?	TBC	Number of road accident casualties per annum
7.d. Will it increase the proportion of freight carried by rail and water?	-	-
7.e. Will it help to reduce traffic congestion and improve road safety?	On average, the annual growth rate in traffic volumes in both Gloucester City and Gloucestershire is 1%.	<p>Number of road accident casualties per annum.</p> <p>Annual average flow per 1,000 km of principal roads.</p>

SA Objectives	Baseline Information	Indicator/s
8. To improve environmental quality (air, water, land)		
8.a. Will it help to reduce any sources of pollution?	Road traffic is the main source of air-borne pollution in Gloucester, however the air quality in Gloucester is good compared to other cities and approaches that found in rural areas. Levels of nitrogen dioxide are generally within acceptable limits.	Days when pollution is moderate or higher Annual average nitrogen dioxide concentration
8.b. Will it help to reduce levels of noise?	-	Percentage of residents surveyed who are concerned with different types of noise in their area. Number of formal noise complaints received by the Council per annum.
8.c. Will it maintain and enhance water quality?	-	Percentage of main rivers and canals classified as good or fair quality Dangerous substances in water Nutrients in water
8.e. Will it maintain and enhance air quality?	-	Population living in Air Quality Management Areas
8.f. Will it maintain and enhance land/soil quality?	-	-
8.g. Will it reduce the amount of derelict, degraded and underused land?	Between 1 st April 2004 and 31 st March 2005 the percentage of new homes built on previously developed land was 443 representing 80% of the total number of new homes built.	Vacant land and properties and derelict land. Number of planning applications granted permission with remediation maintenance conditions attached per annum. Percentage of all new development on previously used land.

SA Objectives	Baseline Information	Indicator/s
9. To reduce contributions to climate change		
9.a. Will it reduce contributions to climate change?	<p>In 2003/2004 the amount of household waste and composting in Gloucester amounted to 9.72% of all household waste in the City.</p> <p>Gloucester City Councils Home Energy Conservation Act (1995) improvement figure for 1st April 2003 – 31 March 2004 was 3.8% - this represents an estimated energy saving of 264,867 Giga Joules (GJ).</p>	<p>CO2 emissions</p> <p>Energy use per household</p> <p>Total amount of energy supplied from renewable energy sources</p>
9.b. Will it reduce vulnerability to climate change?	See above.	As above.