

25th March 2022

Gloucester City Council Planning Department,
92 Westgate Street,
Gloucester,
GL1 2PE

By e-mail

Dear Sir/Madam,

Request for Screening Opinion under Regulation 6 of the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as amended) for the proposed of up to 330 dwellings, associated infrastructure and landscaping on land at Great Western Yard, Great Western Road, Gloucester.

We write on behalf of Eutopia Homes (Gloucester) Ltd. (the "Applicant") to request a Screening Opinion to determine the requirement for an Environmental Impact Assessment (EIA) to accompany a planning application for the **proposed residential development scheme of up to 330 dwellings with associated landscaping, parking, and ancillary works** (the 'Proposed Development') on land at Great Western Yard, Great Western Road, Gloucester ("the Site"). This request is made pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations').

In accordance with the EIA Regulations, please find enclosed:

- i) A plan sufficient to identify the land (drawing **P20-0832_01 SLP**)
- ii) A brief description of the nature and purpose of the development and its possible effects on the environment, set out below; and
- iii) Such other information and representation comprising:
 - a. An assessment against the criteria of the EIA Regulations including Schedule 3, also set out below; and
 - b. Environmental Designations Plan (**P20-0832_02 EDP**).

Proposed Development

The Proposed Development comprises the clearance of the Site, including the demolition of all of the extant buildings within the Site and the construction of up to 330 dwellings with associated open space and access within a site area of 3.14ha.

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PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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The residential component would comprise of dwellings of a mixed size (number of bedrooms), type (terraced and apartments) and tenure (open market or affordable housing), to be determined during the planning application stage. The footprint of dwellings would vary depending on size/type of property; the maximum height would be up to 5 storeys. The residential development would include the associated estate roads, footpaths/cycle ways, parking, lighting and strategic landscaping and appropriate supporting infrastructure.

Site Context

The Application Site is approximately 3.14ha of brownfield land, geometric in shape with a flat topography in keeping with the surrounding area which is generally level. The Site is located in the city of Gloucester, approximately 260m west of Gloucester Railway Station. The Site was previously owned by Network Rail and comprises a disused rail depot, small operational timber yard and vehicle repair garage. Immediately south of the Site is the operational railway line serving Gloucester Station. The Site is located within the administrative boundary of Gloucester City Council.

Lying in the wider vicinity of the Application Site is a mixed-use area comprising residential and commercial uses. The Gloucestershire Royal Hospital is immediately north of the Site, Pullman Court Business Centre immediately to the west and circa 1900's Victorian terrace properties adjoin the Site's northern boundary in part. The Site allows for access at both ends of the linear Site and is well connected to key routes within and out of the city of Gloucester. There are no Public Right of Ways (PRoW) within the Site, however the proposal will include a network of footpaths linking pockets of space throughout the Site.

The Application Site is not in, or adjacent to, an environmentally sensitive area, as defined by Regulation 2(1) of the EIA Regulations (i.e., sites designated as Sites of Special Scientific Interest (SSSI), National Parks, World Heritage Sites, Scheduled Monuments, Area of Outstanding Natural Beauty, and sites covered by international conservation designations), and therefore is not considered to represent an environmentally sensitive location.

Within a 5km study area of the Site are the following designations:

- Barnwood Arboretum LNR (circa 1.6km east);
- Alney Island LNR (circa 1.4km west);
- Saintbridge Balancing Pond LNR (circa 1.6km south-east);
- Robinswood Hill LNR (circa 2.4km south);
- Hucclecote Meadows LNR/SSSI (circa 3.3km south-east);
- Innsworth Meadow SSI (circa 3.1km north); and
- Green Farm Orchard LNR (circa 4.4km south-west) of the Site.

A Preliminary Ecological Appraisal of the Site was undertaken in September 2020 and the Site was found to be comprised of primarily hardstanding with significant scrub/ ruderal and early successional vegetation encroachment. Habitats on-site were considered to be of low



potential for reptiles. All vacant structures within the former sidings area and former diesel depot underwent a Preliminary Bat Roost Assessment. These internal inspections did not record any presence of bats in the structures and features present were considered to have only low or negligible potential to support roosting bats. A 2020 and 2021 nocturnal bat survey did not record any bats roosting within these buildings and only negligible levels of bat activity were recorded. There was evidence of nesting bird activity across the Site including feral pigeon and black bird within buildings and within trees and scrub vegetation present on-site. Opportunities for other protected species such as Dormouse, Otter, Water Vole and Badger were negligible, and these species are therefore considered unlikely to be impacted on by development of the Site.

The design of the Proposed Development seeks to provide further well-designed landscaping on-site, as an extension to the existing underused green space to its north-east and make a valuable contribution to improving the biodiversity at the Site. Whilst there may be an effect on biodiversity, the Proposed Development seeks to retain and enhance areas of ecological value where possible. Through the implementation of appropriate measures during construction, effects can be managed and are unlikely to be unusually complex or significant. Provisional Agricultural Land Quality Classification identifies the entire Site as Urban. It is considered from the evidence presented that there is unlikely to be any significant adverse effects associated with biodiversity.

The Site is not covered by any current national or local landscape designations. Cotswold AONB is approximately 4km east of the Application Site. The Proposed Development lies within the Landscape Typology 'Urban' in the setting of Gloucester within the 'Severn and Avon Vales' National Character Area 95 (NCA). The Townscape Character Assessment: Gloucester (June 2019) depicts the Site within the Kingsholm and Wotton Ward. The general character of the area is a mix of uses with a wide variety of house types. The Gloucestershire Royal Hospital complex occupies a large area of land between Great Western Road, London Road and Horton Road, north of the Application Site. Gloucestershire Royal Hospital has a number of buildings including Listed Victorian elements. The railway triangle and railway corridor have become a large area of light industrial and retail park usage. The Application Site lies within the railway triangle/ corridor development zone, a segmented area from the city centre. It is part of the 'City Plan' to push development out beyond the city centre and allow fringe areas of Gloucester to see the benefit of new development (Policy SP2 in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (December 2017)). Developing within the railway triangle/ corridor zone will further integrate this zone with the city centre. It is considered from the evidence presented in this Screening Request that there is unlikely to be any significant adverse effects associated with townscape and visual impacts.

The Site is not located within any statutory/non-statutory heritage designated sites. The Site does not contain any statutorily Listed Building, nor is it located within the boundaries of a Conservation Area. Additionally, there are no statutorily Listed Buildings within the vicinity of the Site which may be sensitive to development within their setting. The Site does not lie within a Scheduled Monument. A Heritage Appraisal of the Site was undertaken in 2022 identifying three non-designated buildings on-site requiring demolition due to the Proposed

Development. Two of the buildings were built in the mid-20th century with the significance of these two buildings as very low, and due to their condition, it is not possible to retain or renovate them without significant works to their fabric. The remaining building has its origins as one of the older phases of development on the Site, used a utilitarian office building. However, the building has been significantly altered and changed during its lifetime and is now in a derelict condition with very little of its original form and design detailing remaining. The report concludes the existing structures on-site, derelict and of extremely poor condition, are of low heritage significance and that their proposed loss has to be balanced against the benefits of the scheme.

The Site is entirely located in Flood Zone 1 which is considered the lowest risk for flooding by the Environment Agency. As such National Planning Policy requires all planning applications above certain thresholds to include a Flood Risk Assessment (FRA), including mitigation in the form of a drainage strategy. An FRA drainage strategy will be provided as part of a planning application and as such the Proposed Development is unlikely to have a significant effect.

The Site does not lie within an Air Quality Management Area (AQMA). The closest AQMA is Barton Street AQMA, located approximately c.450m to the south of the Site. The designated area encompasses Barton Street, Gloucester from its junction with Trier Way/Bruton Way to the northwest and Upton Street to the southeast, with the designation linked to road traffic sources of pollution. As such, the construction and operation of the Proposed Development is unlikely to have a significant effect regarding air quality.

EIA Screening

A development proposal required to be accompanied by an EIA (i.e., 'EIA Development') is defined within the EIA Regulations (Regulation 2) as one that is "... (a) *Schedule 1 development*; or (b) *Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location*" (emphasis added).

Whilst 'Schedule 1 development' is defined by those development of a description mentioned within Schedule 1, 'Schedule 2 development' is defined with reference to the description of development (as set out in Schedule 2, column 1) where the corresponding threshold or criteria is respectively exceeded or met (as set out in Schedule 2, column 2 (as amended)). This proposal is considered against 10(b) Infrastructure Projects, Urban Development, i.e.:

- a. *The development includes more than 1 hectare of urban development which is not dwelling house development (comprising of strategic landscaping/open space); or*
- b. *The proposed development includes greater than 150 dwellings (the Proposed Development has up to 330 dwellings); and*
- c. *The overall site area exceeds 5 hectares*

Guidance on the application of the EIA Regulations is set out within the National Planning Practice Guidance (NPPG), Environmental Impact Assessment section, which provides further indicative criteria and thresholds, as well as key issues to consider in the

determination of likely significance of effects. For 10(b) Urban Development Schemes, the criteria and key issues are identified as:

- Indicative Criteria and Threshold- *"Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed:*
 - i. *area of the scheme is more than 5 hectares; or*
 - ii. *it would provide a total of more than 10,000m² of new commercial floor space; or*
 - iii. *the development would have significant urbanising effects in a previously non-urbanised area (e.g., a new development of more than 1,000 dwellings)."*
- Key issues to Consider – *"Physical scale of such developments, potential increase in traffic, emissions and noise."*

The Proposed Development does not fall within the indicative criterion. Notwithstanding the above, the NPPG clearly states that *"...it should not be presumed that development above this threshold should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects... Each development will need to be considered on its merits'."*

Accordingly, it is necessary to consider the proposed development against the criteria set out within Schedule 3 of the EIA Regulations, which requires the consideration of (1) the characteristics of the development and (2) the environmental sensitivity of the location, both set in the context of (3) the characteristics of the potential impacts, comprising: (a) the extent of impact; (b) the nature of the impact (c) trans-boundary nature of impact; (d) intensity and complexity; (e) probability; (f) the onset, duration, frequency and reversibility of impact; (g) the cumulative impact of the development; and (h) the possibility of reducing the impact.

1. Characteristics of Development

- a. Size – the Site occupies 3.14ha of land which is below the site area threshold set out within both Schedule 2 of the EIA regulations and the NPPG. The number of properties proposed is above the EIA regulations criteria, however, is significantly lower than the indicative threshold set in the NPPG indicative criteria (3). The scale (footprints and heights) of the Proposed Development is similar to the residential properties within the surrounding area of the Site and would neither overwhelm neighbouring properties nor form a landmark

feature within the wider area. The presence of the residential development within the Site would be limited in its geographical extent to the area as indicated; the scale of the development is not of a magnitude or complexity to give rise to any unusual risks or effects; and notwithstanding that the proposed development would be certain and permanent, the effect is theoretically reversible. Accordingly, the proposed development is unlikely to have any significant effects by virtue of its size/scale.

b. Cumulation with other development

There are no notable granted planning permissions within close proximity of the Proposed Development. No notable applications for planning permission or granted planning permission are within the wider locality of the Proposed Development and therefore likely to cause cumulative effects.

c. Use of natural resources –

There would be a loss of land as the Application Site is redeveloping an already urbanised area of land. Natural resources, such as minerals, energy and water would be expended during the construction phase, although the nature and scale of development is not considered sufficiently large or unusual such that the use of resources would be no more than is expected for construction activities, and not of a scale of duration that would be significant. In accordance with construction best practice a Site Waste Management Plan would be implemented to reduce use of resources and encourage recycling. Furthermore, in accordance with best practice, modern design standards and Building Regulations, the new dwellings would be constructed to minimise the use of energy and water. Accordingly, the proposed development would not result in the significant use of natural resources either during the construction or occupation phases.

d. Production of Waste –

Waste associated with the construction phase would primarily comprise arisings from demolition clearance. Furthermore, in accordance with construction best practice a Site Waste Management Plan would be implemented to reduce waste arisings and encourage recycling.

e. Pollution and nuisance –

During the construction phase there would be some potential for some localised noise generation and degradation of air quality (dust and emissions) associated with earth movements, use of plant equipment on-site, vehicle movements associated with materials delivery etc. Given the background noise levels of the Site, largely due to the presence of the surrounding road network including the A4302 Metz Way, Horton Road and Great Western Road, it is considered that the noise impact associated with this development is not likely to have significant effects. Trip generation for the development will be detailed in a supporting Transport Assessment which will consider



access by walking, cycling and public transport in addition to private vehicles. Based upon the anticipated number of vehicle trips associated with this development and the existing traffic flows on the local highway network, it is considered that this development will not have a severe detrimental impact upon the existing highway network and associated traffic flows. There is some potential for pollution to ground and surface waters arising from spillages of oil/diesels from construction plant and equipment. However, this risk is considered to be consistent with all construction works; there would be no unusual or complex activities and risks would be controlled through adoption of construction best practice techniques and secured by standard planning conditions.

f. Risk of accidents –

There would be no unusual or complex processes employed during construction and standard construction best practice would serve to reduce the risks of accidents. Risk to members of the public is low and there will be limited public access to the Site.

2) Location of Development

i. Existing Land Use-

The Site is brownfield land, consisting of a number of extant buildings to be demolished on-site to allow for the Proposed Development. The Application Site does not benefit from Grade 1, 2 or 3a Agricultural Land Classification, as demonstrated by Natural England Regional Agricultural Land Classification Map.

ii. Natural resources within the area-

The Proposed Development would not result in the loss of natural resources, save the minor removal of some vegetation where considered necessary; such loss would not be significant and in any event would be mitigated by the inclusion of new strategic landscaping.

iii. Absorption Capacity

- a. The Site is not located within or in close proximity to any wetland;
- b. The Site is not located within or in close proximity to a coastal zone;
- c. The Site is not located within or in close proximity to a mountain or forest area;
- d. The Site is not located in an environmentally sensitive area. Within 5km there are seven environmentally designated sites; the closest of which is Alney Island LNR circa 1.4km west of the Site.

- e. The Site is not located within or in close proximity to an area subject to any known environmental quality standard set down in EU legislation;
- f. The Site would be an extension to existing urban development in the surrounding area of Gloucester, extending present form creating visual coherence to the surrounding area. Given the site context and the nature of the proposed development it is considered unlikely that significant effects on densely populated areas would occur; and
- g. The Site is not located within an area of historical, cultural, or archaeological significance.

In summary, the Proposed Development is not listed as a Schedule 1 project and is not located within a 'sensitive area' in the context of the EIA Regulations but does exceed the threshold of the Schedule 2 EIA Regulations for this type of development (10(b)) and the threshold in the NPPG.

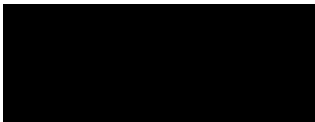
It is therefore concluded that whilst there may be some effects upon the environment as a consequence of the Proposed Development, these would be limited in their effect and extent, such that none of them could be considered to constitute 'significant effects' in the context of EIA Regulations.

Accordingly, it is considered that the proposal does not constitute EIA development and therefore the planning application should not be required to be accompanied by an Environmental Statement.

We look forward to receiving the Council's Screening Opinion within 3 weeks from receipt of this request, in accordance with Regulation 6(6) of the EIA Regulations.

In the meantime, should you have any queries or require any further information please do not hesitate to contact me.

Yours faithfully,



Hannah Tidd
Environmental Planner



Enclosed:
Site Location Plan **P20-0832_01 SLP**
Environmental Designations Plan **P20-0832_02 EDP**

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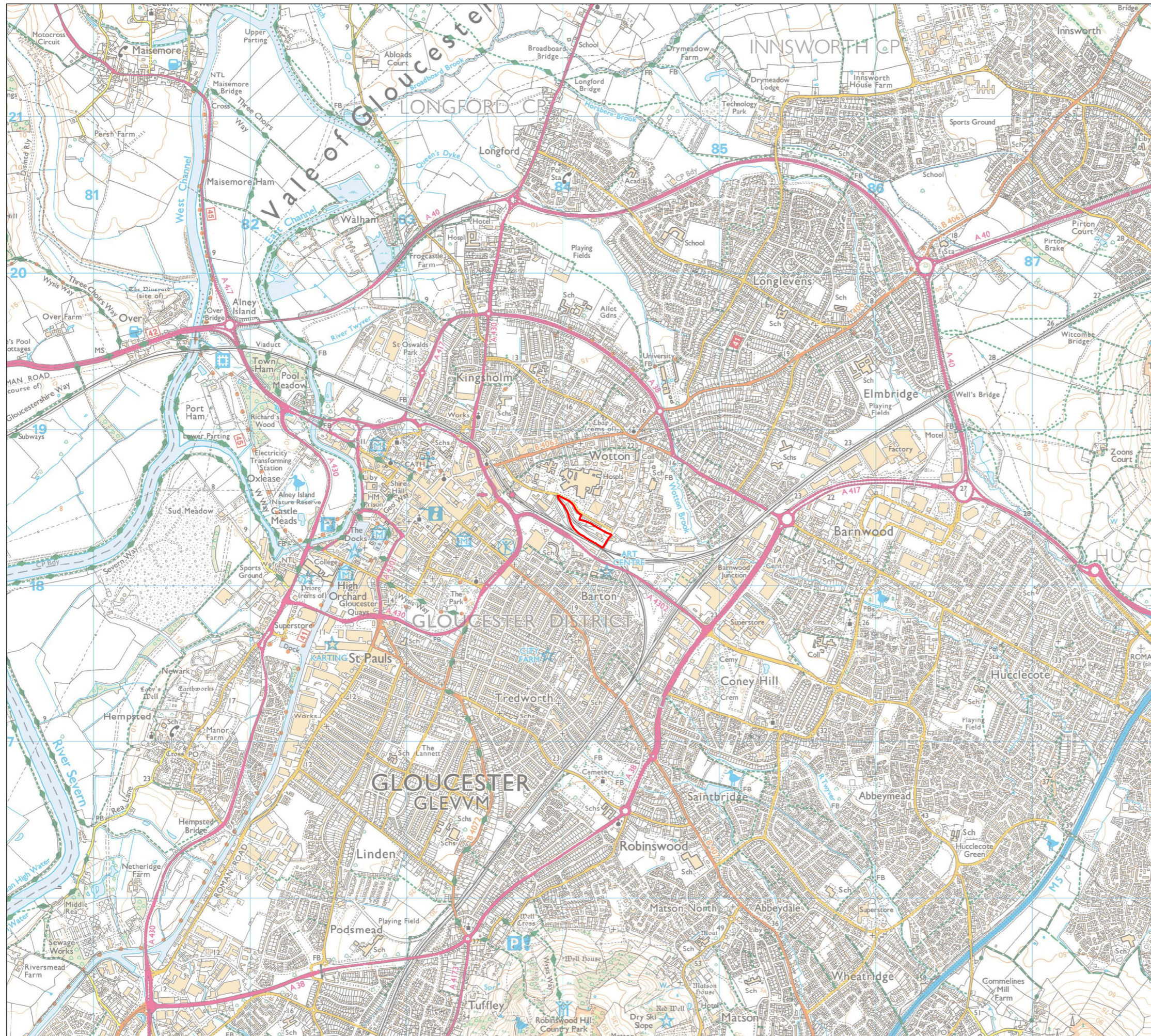
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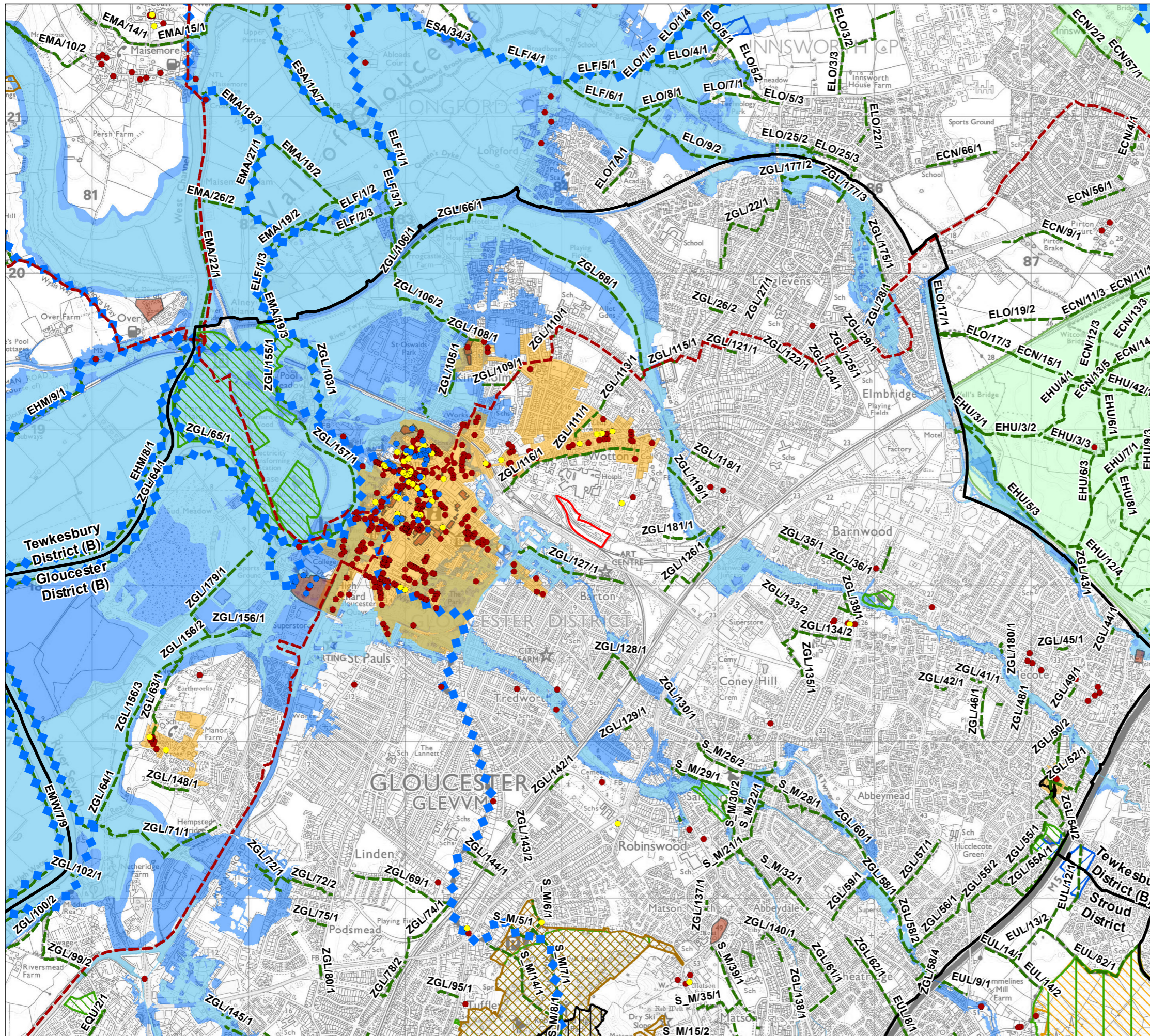
KEY
 Site Boundary

Revisions:
 First Issue- 02/02/2022 JS

Site Location Plan
Great Western Yard, Gloucester

Client: Eutopia Homes
 DRWG No: **P20-0832_01** Sheet No: - REV: -
 Drawn by: JS Approved by: IH
 Date: 02/02/2022
 Scale: 1:25,000 @ A3





KEY

- Site Boundary
- Local Authority Boundary
- Sustrans National Route
- ◆◆◆◆ Long Distance/Recreational Route
- Public Right of Way
- Area of Outstanding Natural Beauty (AONB)
- Open Access Land / Registered Common Land
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building
- Country Park
- Scheduled Monument
- Environmentally Sensitive Area (ESA)
- Conservation Area
- Local Nature Reserve (LNR)
- Site of Special Scientific Interest (SSSI)
- Ancient Woodland
- Green Belt
- EA Flood Zone 3
- EA Flood Zone 2

Revisions:
First Issue- 02/02/2022 JS

Environmental Designations Plan
Great Western Yard, Gloucester

Client: Eutopia Homes
 DRWG No: P20-0832_02 Sheet No: - REV: -
 Drawn by: JS Approved by: IH
 Date: 02/02/2022
 Scale: 1:25,000 @ A3

