



GLOUCESTER CITY PLAN

SUSTAINABILITY (INTEGRATED) APPRAISAL

**(Sustainability Appraisal, Strategic
Environmental Assessment, Health Impact
Assessment, Equalities Impact
Assessment)**

NON-TECHNICAL SUMMARY

OCTOBER 2016



Gloucester City Council Gloucester City Plan: Draft

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

DRAFT Sustainability Appraisal Report NON-TECHNICAL SUMMARY

October 2016

enfusion

environmental planning and management for sustainability



Treenwood House
Rowden Lane
Bradford-on-Avon
BA15 2AU
T: 01225 867112
www.enfusion.co.uk

Non-Technical Summary (NTS)

This is the NTS of the Sustainability Report

1. This is the Non-Technical Summary of the Sustainability (Integrated) Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an Integrated Appraisal for the Draft Gloucester City Plan (GCP). This summary is an integral part of the Sustainability (Integrated) Appraisal Report that accompanies the Draft GCP for public consultation in January 2017. It provides an outline of the SA process and findings, including how the SA has influenced the development of the Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

The Gloucester City Plan (GCP)

2. Gloucester City Council, in partnership with Cheltenham Borough Council and Tewkesbury Borough Council have produced a Joint Core Strategy (JCS) which sets out a strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period to 2031) sets out the housing and employment needs for the Gloucester City area, which includes strategic direction for development growth and strategic policies. The Gloucester City Plan (GCP) covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance.
3. The GCT JCS identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031. At least 14,359 of these dwellings are identified to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS therefore is in the process of identifying strategic allocations / urban extensions around Gloucester to meet the residual need.
4. The GCP will identify the sites to deliver the 7,685 new dwellings. Two of these sites (Land at Winneycroft Lane / Corncroft Lane) are included within the GCT JCS given the strategic scale of development at these sites. As such, these sites have been appraised within the GCT JCS Sustainability Appraisal Addendum Report (2016), and it is not considered necessary to duplicate an assessment of these sites within this SA Report. The GCP, alongside the GCT JCS, will provide the planning policies that will be used to guide and manage development over the plan period to 2031.
5. The Draft GCP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability (Integrated) Appraisal, and consultation with the public, stakeholders and the regulators. The Draft GCP sets out the key challenges for the GCP area with a

proposed Vision for the development until 2031 and suggests Principles to address key issues and to help deliver the Vision.

6. The Draft GCP comprises of proposed Policies and site allocations, and alongside the GCT JCS, will guide the planning and management of growth and development in the Gloucester City area to accommodate the necessary new housing and jobs whilst protecting important and valued environmental assets such as biodiversity and historic heritage. The Draft GCP invites comments on the proposed site allocations, a call for new sites, and planning policies. Any comments received will be taken into consideration and reported in the subsequent stages of plan-making.

Integrated Appraisal: SA, SEA, EqIA and HRA

7. The purpose of Sustainability (Integrated) Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
8. Gloucester City Council commissioned independent specialist consultants, Enfusion, to progress the appraisal work in June 2016. For the SA of the GCP, an integrated process has been undertaken that also addresses health and equality issues alongside the requirements of the Habitats Assessment Regulations (HRA) (HRA Report available separately). The findings of the health and habitats assessments have been integrated into the SA. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the GCT Joint Core Strategy.
9. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope, the SA is prepared and includes an SA Framework of objectives for sustainable development in the Gloucester City area, and which forms the basis against which the Draft GCP is assessed.

Sustainability characteristics of the Gloucester City area

10. Gloucester City is characterised by its strong historic heritage, and dockland areas which have been the subject of ongoing regeneration. Much of the central area of Gloucester City forms part of the historic setting, containing many Listed Buildings, Scheduled Monuments and Conservation Areas. The

central area is also a designated Area of Archaeological Potential. The City is well connected in terms of road, rail and freight movements, and also with national cycle network connections and promoted walking routes. The City also contains over 500ha of open space and two designated Sites of Special Scientific Interest (SSSIs).

11. The majority of housing in Gloucester is semi-detached, and property prices in Gloucester are significantly lower than those in the surrounding local authority areas of Tewkesbury, Cheltenham, Stroud, Cotswold and Forest of Dean. A high percentage of the people of Gloucester City are economically active and the City also experiences a high number of in-commuters. A number of health indicators are identified as worse than the average for England in Gloucester, and these include levels of adult and child obesity, and levels of adult physical activity. The City is also constrained by flood risk, particularly fluvial flood risk as the River Severn channel becomes narrower, and the raising of flood defences, particularly around Westgate, is considered to deliver the most benefit is combating this risk. Without the Gloucester City Plan to guide new development, pressures on important townscape, heritage and biodiversity assets may cause adverse effects. The GCP can also maximise the potential benefits arising from new development, with opportunities for sustainable, well connected development that contributes to improving the experience of the City and the health and wellbeing of its residents, employees and visitors.

Key Sustainability Issues, Problems and Opportunities

12. The key sustainability issues and opportunities are summarised in the table below:

Key Sustainability Issues and Opportunities
Many of the un-built parts of the City are of significant landscape and/or nature conservation importance, particularly Sites of Special Scientific Interest.
A large proportion of the City falls within the River Severn floodplain.
Gloucester has an important built and cultural heritage with significant Conservation Areas and Listed Buildings.
Certain areas of the City suffer from traffic congestion and poor air quality.
There is a need to encourage a move away from the dependence on the private car.
There is a need to ensure carbon emissions are minimised.
Previously developed land may be subject to contamination.
The City needs to protect areas of public open space and green corridors/networks, and ensure open spaces are accessible to all.
There are areas of the City that experience high unemployment rates.
There is a growth in the service job sector and a need to protect from a significant decline in manufacturing industry.
High levels of in-commuting.
Limited early hours / evening economy.

Need to plan for and protect quality employment land and ensure a future supply.
There are older, less attractive employment areas.
Lack of overnight tourist visitors.
Poor retail provision compared to the size of Gloucester's shopper population.
There are opportunities to connect new employment development with key transport infrastructure projects (e.g. the M5 and Blackfriars to support the growth zone identified in the Strategic Economic Plan, and alongside the new bus station.
There is acute housing 'need' in the City.
'Pockets' of acute deprivation exist in some parts of the City.
There is a significant growth in the population predicted, particularly in the young and working age bands.
Growth in the number of households, in particular single person households.
Educational achievement needs improving.
Homelessness
There are inequalities in opportunity across the Plan area.
High levels of obesity in both adults and children.
Adequate protection of cultural heritage.
Localism driving increased local level participation.
Crime and fear of crime.
There are areas of the City that experience high unemployment rates.
There is a national requirement to minimise waste production and the amount of waste sent to landfill.
There is a requirement to maintain and improve the ecological status of the River Basin.

How has the GCP been assessed?

13. An SA Framework was compiled (based on that used for the GCT Joint Core Strategy to progress a consistency of approach), including SA Objectives that aim to resolve the issues and problems identified for development planning in the GCP area. This SA Framework, together with the baseline information and PP Review has been updated in this SA Report, and comprises the basis for assessment. The updated SA Framework can be found in Table 2.1 of the main SA Report, and a summary of the updated key issues and SA Objectives is presented in Appendix II of the main SA Report.
14. Each developing element of the Draft GCP, including potential site allocations and policies to control proposed development, was subject to SA. Using the SA Framework, the baseline information and professional opinion, the likely effects of the emerging Draft GCP were assessed. The SA considered positive, negative and cumulative effects according to categories of significance as set out in the following table:

Categories of Significance for SA		
Symbol	Meaning	Sustainability Effect

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

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

What reasonable alternatives have been considered and addressed?

16. Through the development of the Draft GCP, alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed the plan-making. Potential reasonable options for site allocations were assessed individually and with consideration of cumulative effects in settlement areas where possible. This Draft GCP invites comments on the proposed site allocations, a call for sites, and development management policies. Any comments received will be taken into consideration and reported in the subsequent stages of plan-making. The findings of the SA informed this selection but is not the sole source of information to inform decision-making as part of the plan preparation.
17. The Sustainability (Integrated) Appraisal considered cumulative effects and the inter-relationships between sustainability topics for each site option where possible, and made comments with regard to any significant effects, where possible.

What are the likely significant effects of the Draft GCP?

18. Overall, the implementation of the policies presented in the Draft GCP were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from technical studies, the wider evidence base, and comments received from public consultations on draft proposals. The key positive effects are as follows:

- Major long term and cumulative positive effects through meeting the housing needs of the GCP area - will also support economic objectives; good quality housing will have major direct cumulative positive effects on health
 - Ensuring that community facilities and other supporting infrastructure will be provided with both short and long term positive effects
 - Support for the economy and employment – will also have further positive effects for health and wellbeing; the vitality of the city and town centres
 - Long term protection against flood risk from all sources
 - Landscape, biodiversity and historic assets are protected.
 - Significant cumulative positive effects as a result of regeneration, which is heritage led providing a sense of identity and distinctiveness, delivering mixed-use development within the identified housing / regeneration zones.
19. Alongside the positive effects, some minor negative effects were also identified, largely as a result of the overall, cumulative effect of increased housing, employment and associated infrastructure development in the plan area. The key potential negative effects are summarised as follows:
- Noise, air quality reduction, pollution, and congestion, arising from the overall predicted growth in road based traffic
 - Effects on landscape and indirect effects for biodiversity, where local level habitats and linkages disturbed or removed – cumulative in the longer term

How could negative effects be mitigated?

20. A key function of the SA and overall Sustainability (Integrated) Appraisal process is to provide advice and recommendations to the development of the plan in order to mitigate identified negative effects and enhance positive effects. At each stage, these recommendations are taken forward into the next stage of the plan making process. The SA includes recommendations to support the plan development stages.
21. Potential negative effects have been mitigated through strong policies that protect the natural environment and promote sustainable and connected communities through requirements for appropriate provision of supporting infrastructure, such as community centres and transport. This is supported by policies within the higher-level Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. A strong feature of the JCS is the commitment to Green Infrastructure, recognising the many benefits it can provide, including managing flood risk, enhancing biodiversity, and providing recreational spaces for people. Potential negative effects on local biodiversity in the Draft GCP will be mitigated through the requirement to conserve and improve biodiversity in new development, wherever possible. The SA Recommendations and Suggestions include:

Recommendation(s):

- Enhanced support for the strategic connectivity of open recreational spaces, in line with the Open Space Strategy.
- Enhanced policy wording that seeks qualitative improvements to existing open spaces, where quantitative contributions are not required
- Clarification around acceptable approaches to preventing Gull roosting, nesting and damage, and the prioritisation of non-lethal solutions

Suggestions:

- Encouragement for early Phase 1 Habitats Surveys on brownfield sites

EqIA

22. The screening assessment has found that the Draft GCP is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

Consultation

23. The Draft GCP and its accompanying SA documents are provided for consultation through the Council's website. Comments made and responses to them will be recorded and made available. Thus consultation is a vital ongoing and iterative element of the plan-making and SA processes. The Draft GCP and accompanying SA Report reflect the findings of various technical studies and responses received so far during consultation.
24. The Draft GCP and this accompanying Sustainability Appraisal Report will be available for consultation for a period of approximately 6 weeks beginning in January 2017.

Monitoring Proposals

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