



GLOUCESTER CITY PLAN 2011-2031

SUSTAINABILITY APPRAISAL (SA)
(integrating Strategic Environmental Assessment,
Health Impact Assessment, Equality Impact
Assessment, Habitats Regulations Assessment)

SA ADOPTION STATEMENT
January 2023

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Gloucester City Plan (GCP) 2011-2031:

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This SA Adoption Statement

- 1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development – as set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF¹, revised 2021).
- 2 SA incorporates the requirements for Strategic Environmental Assessment (SEA) implemented in the UK through the SEA Regulations (2004)². SEA seeks to provide a high level of protection of the environment and to contribute to promoting sustainable development by integrating environmental considerations into the process of preparing certain plans and programmes.
- 3 In addition, the Council chose to integrate the Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes within the overarching SA/SEA process. HIA is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty³ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. The SA, SEA, HIA and EqIA therefore all form part of the integrated Sustainability Appraisal (SA) process for the Gloucester City Plan (GCP).
- 4 The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the GCP. The HRA process has its own legislative drivers and requirements⁴. Whilst the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel to the SA and its findings have informed the SA, but the details have been reported separately.
- 5 The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations and as guided through Government Planning Practice⁵. This SA Adoption Statement satisfies the SA/SEA requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

³ Equality Act, 2010

⁴ Conservation of Habitats and Species Regulations (2017)

⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- (a) how environmental considerations have been integrated into the plan or programme;*
 - (b) how the environmental report has been taken into account;*
 - (c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*
 - (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;*
 - (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*
 - (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*
- 6 SA should demonstrate how the plan has addressed relevant economic, social, and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

Development of the Gloucester City Plan 2031

- 7 The Gloucester City Council has prepared a new Local Plan in consideration of the revised NPPF, changed local circumstances, and the progress of the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS, adopted December 2017)⁶. The GCT JCS (2011-2031) sets out the housing and employment needs for the Gloucester City area including the strategic direction for development growth with Policies (Strategic, Allocation, and Delivery). The Gloucester City Plan (GCP), covering the administrative area of Gloucester City, will guide development in the local area and is part of a hierarchy of planning policy sitting underneath the higher-level JCS.
- 8 The GCT JCS through Strategic Policy SP1 Need for Development sets out the requirement for approximately 35,175 new homes and land to support approximately 39,500 new jobs. This is to be delivered by development within existing urban areas through district plans, existing commitments, urban extensions to Cheltenham and Gloucester, and the provision of Strategic Allocation at Ashchurch. The housing requirement for the Gloucester City Council area is for at least 14,359 new homes. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary. The GCT JCS therefore identifies strategic allocations around Gloucester to contribute to the residual need – Policy A1 Innsworth and Twigworth; Policy A2

⁶ <https://www.jointcorestrategy.org/adopted-joint-core-strategy>

South Churchdown and Policy A3 North Brockworth; in addition to Policy A6 Winnycroft (which is within its administrative boundary).

- 9 The Gloucester City Plan presents an overall Vision, as follows:

“Between 2011 and 2031 the city Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan. During this time significant progress will have been made in the regeneration of the City Centre and elsewhere within Gloucester. The city will be a flourishing, healthy, modern and ambitious City, where people feel safe and happy in their community and are proud to live and work. Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location, whilst supporting business growth and expansion within the city itself. A significant number of new decent homes will have been delivered in a way that reflects the type and tenure needed by the local community and that supports economic growth. Health and wellbeing will be improved through the protection and provision of active streets, open and green spaces, woods and trees, playing fields, community infrastructure, environmental quality, connectivity and access. New development will be built to the highest possible standard of design, focused on protecting the quality and local distinctiveness of the city, whilst responding to and building resilience and adaptability to the implications of climate change. Gloucester’s unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy.”

- 10 A set of 13 key principles set out how the City Plan Vision will be delivered. The scale and distribution of new development is directed by GCT JCS Policies SP1-2. Further guidance on development is detailed through Local Policies A1-A10 Housing), B1-B6 Employment, Culture & Tourism, C1-C8 Healthy Communities, D1-D4 Historic Environment, E1-E7 Natural environment, F1-F7 Design, G1-G7 Sustainable Transport & Parking, and Policy SA Site Allocations. JCS Policies are supported through local policies to reflect the Gloucester city area characteristics and provide local guidance on healthy communities; the historic environment; the natural environment; design; sustainable living, transport & infrastructure.
- 11 The GCP allocates 18 local (non-strategic) sites for new development through Policies SA01-SA18. Policies SA02-SA05, SA09-SA13, and SA15-SA16 allocate residential development. A new primary school and residential dwellings is allocated through Policy SA01; a sports and community hub allocated through Policy SA06; employment supported through Policy SA14; mixed use development allocated for Policies SA07, SA08 and SA18; and a replacement community facility allocated through Policy SA17.
- 12 Considerable work and consultation have been undertaken since early preparation in 2011 to develop the Local Plan. Various studies were undertaken to provide the evidence⁷ base to inform decision-making, including on housing; employment and economy; retail and city centres, tourism and culture; health and wellbeing; the historic environment; the

⁷ <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan-examination-library/>

natural environment; design; sustainable transport; infrastructure; and viability. Systematic assessments of potential site options for possible allocation were also undertaken.

- 13 The proposed draft Gloucester City Plan was submitted to the Secretary of State for independent examination by a planning inspector on 20 November 2020. Hearing sessions were held virtually via Zoom between 11 May and 9 June 2021. The Inspector advised in her initial findings (Post Hearings Letter 19 August 2021) that she considered the GCP to be a Plan that could be found sound subject to Main Modifications (MMs). Following additional work by the Council, the proposed MMs to the GCP were published for public consultation between 16 May and 4 July 2022. The Inspector in her final report (9 November 2022) concluded that the duty to cooperate has been met and that with the recommended main modifications, the Gloucester City Plan 2011-2031 satisfies the requirements of Section 20(5) of the 2004 Act and is sound and legally compliant.
- 14 In accordance with the Council's adopted Statement of Community Involvement (SCI), at each stage of the development of the Local Plan, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised, and responses prepared have been documented during the development of the Local Plan and published on the Council's website⁸.

How environmental and sustainability considerations have been integrated into the Local Plan; How the Sustainability/Environmental Report has been taken into account

- 15 During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan. The SA was undertaken in accordance with government guidance⁹ which encourages a staged approach that integrates appraisals to consider the effects of the emerging plan on socio-economic as well as environmental factors. Initial SA work (2012-2013) was undertaken by the Council. Since 2016, independent specialist consultants have been appointed to carry out the SA for the Council. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the Local Plan.
- 16 The SA of the Local Plan built upon the assessments carried out for the GCT JCS to ensure compatibility and continuity of assessments with more locally specific thresholds and criteria relevant to the Gloucester City area incorporated into the assessment for the GCP. The SA used the same SA

⁸ <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan/>

⁹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Framework developed during the SA scoping process (2012, revised and updated 2016) as the basis for assessing the emerging GCP - and as explained in Section 2 of the submitted SA Report (July 2019). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Sub-Objectives/Decision-Aiding Questions that seek to resolve the sustainability issues identified and relevant to the plan and the Gloucester City Council area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.

- 17 The SA considered the likely significant effects of the implementation of the Local Plan on the sustainability objectives for the Gloucester City Council area. For each aspect of the GCP, the assessment against the SA Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported. The SA was informed by best available information and considered the effects of the policies of the GCP as a whole.
- 18 There is limited possibility for investigating strategic options through the Gloucester City Plan. The GCT JCS sets out the overarching strategy for growth and identifies a settlement hierarchy as the basis for the strategy for delivering growth targets, and the development of this strategic approach was tested through SA. For the GCP, potential site allocation options were investigated, tested through SA, and were presented in the SA Reports that accompanied the Initial Regulation 18 consultation (May – July 2013) and the revised Regulation 18 consultation draft GCP (January – February 2017). In this way, relevant alternatives have been tested through the SA process in an iterative and ongoing way to inform plan-making. The SA reported outline reasons for progressing or rejecting potential options for allocation. The findings and recommendations of the SA informed plan-making and were integrated into the development of the Local Plan - and as set out in the Submitted SA Report (July 2019).
- 19 Overall, the SA found that the Gloucester City Plan is likely to have positive effects for SA objectives on housing, employment/economy, and communities. Certain sites allocated for residential development are located within more deprived areas of the city and indicate significant positive effects as such new development can contribute to reducing inequalities. The selection and location/capacity of the site allocations, together with site-specific requirements - provide relevant mitigation measures to reduce potential negative effects and confirm possible positive effects. Provision of land for housing and employment will contribute to SA objectives for communities/population and health. Other policies also guide development for achieving positive results for local communities, include access to open space and recreational facilities, creating safe and well-designed

developments, and preventing negative effects associated with noise, air, and water pollution.

- 20 There is the potential for significant negative effects on transport, landscape/townscape, water management, protected and local biodiversity, and the historic environment. However, mitigation measures are provided through local policies and the specific location of site allocations selected to minimise negative effects. The SA made suggestions and recommendations for reducing uncertainty and potential negative effects, for example, with site-specific requirements for development proposals
- 21 The Equality Impact Assessment (EqIA) screening found that the Gloucester City Plan 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. The Habitats Regulations Assessment (HRA) found that the GCP is considered unlikely to have significant effects on any European sites, alone or in-combination with other plans and projects. However, it was noted that the JCS authorities and other local planning authorities, together with the Environment Agency and Natural England would continue to work to address the issue of increased recreational pressures on the Cotswold Beechwoods SAC and the Severn Estuary SAC/SPA/Ramsar. GCP Policy E2 sets out the requirements that proposed development must meet and the supporting text provides further guidance on internationally designated sites.
- 22 Following submissions to the examination and discussions at the hearings, proposed Main Modifications (MMs) to the GCP were prepared and subject to SA. Many amendments are for updating and to provide further clarity and as such are not significant for SA and HRA. Many of the MMs were refinements to improve the effectiveness of the policies, including site-specific deliverables for flood risk management and ecological enhancement, thus confirming certainty of implementation of such mitigation measures, and reaffirming previous SA findings for reducing negative effects to neutral/not significant. Other MMs reflected updating of site allocations, for example where planning permissions have now been received, where sites have been removed due to current unavailability, and where the potential capacity has changed.
- 23 These matters were explained and assessed in the SA Addendum Report (April 2022) accompanying the proposed Main Modifications to the Local Plan. Those MMs identified as potentially significant for SA/SEA were then appraised using the same methods and assessors as for the submitted SA Report. Overall, it was found that the previous findings of the SA/SEA remain relevant and valid. The refinements strengthen the mitigation measures embedded in the policies and thus confirm that there will be no significant negative effects and that positive effects have been optimised. The previous findings of the HRA remain relevant and valid - the GCP will not have adverse effects on the integrity of protected sites, alone or in combination.
- 24 The Inspector requested that the Council should undertake SA of an additional site – Land east of Winnycroft Lane. The site was tested through SA in a consistent and comparable manner as far as possible using the same SA

framework of objectives and published evidence. The site contains the nationally protected Scheduled Monument of Sneedham's Green moated site. As an earthwork, this monument is visible and can be comprehended as a heritage asset and appreciated within its historic setting. The setting of moated sites consists of their rural location and this link with the countryside provides a substantial part of the monument's significance. The SA found major negative effects likely from new development on the historic environment. Overall, the SA findings indicated that the site is not suitable for consideration as a site allocation in the GCP due to major negative effects on the historic environment and uncertainty about the effectiveness of any mitigation possibilities. The Inspector in her final report found that the quantum of housing development to be provided within Gloucester City is consistent with the urban capacity for Gloucester set out in the JCS and concluded therefore there was no requirement to revisit those sites which were not considered reasonable alternatives with the Strategic Assessment of Land Availability.

How the results of consultation have been taken into account

- 25 Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the Local Plan preparation and the SA as follows:

GCP Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
City Plan Scope Consultation 23 May – 23 August 2011	
City Plan Part 1 (development strategy and key development principles) Consultation March – April 2012	Sustainability Appraisal Statement February 2012 (undertaken by Gloucester City Council) Consultation March – April 2012
City Plan Part 2 (development site options) Consultation 13 May – 12 July 2013	Sustainability Appraisal Report May 2013 (undertaken by Gloucester City Council) Consultation 13 May – 12 July 2013
Draft Gloucester City Plan Regulation 18 Consultation 16 January – 27 February 2017	Sustainability Appraisal Report October 2016 (undertaken by Enfusion) Regulation 18 Consultation 16 January - 27 February 2017
Pre-Submission GCP Regulation 19 Public consultation 7 November 2021- 14 February 2020	SA Report (July 2019) Regulation 19 Public Consultation 7 November 2021- 14 February 2020
Submission GCP Regulation 20 Submission to Secretary of State 20 November 2020	SA Report Regulation 20 Submission to Secretary of State 20 November 2020

Examination Hearings 11 May to 9 June 2021	Examination Hearings 11 May to 9 June 2021
Main Modifications Consultation 16 May - 4 July 2022	SA Report (April 2022) Consultation 16 May - 4 July 2022
Adoption of GCP January 2023	SA Adoption Statement January 2023

26 SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and the responses made to issues and concerns raised have been published, including at key statutory stages, as follows:

- SA Scoping Report October 2011
- Appendix VI of Pre-Submission SA Report (July 2019) summarises SA representations to consultation and responses
- The SA Addendum Report (April 2022) outlines issues raised and discussed at the examination and resulting in the proposed Main Modifications

Consultation representations and responses are available on the Council's website under pages for the Gloucester City Plan¹⁰.

Reasons for choosing the Local Plan as adopted, in the light of other reasonable alternatives

27 The SEA Regulations require assessment of the likely significant effects of implementing the plan and "reasonable alternatives" taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. The UK Government's planning practice guidance¹¹ states that "reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable".

28 There is limited possibility for investigating strategic options for the Gloucester City Plan as this was investigated through the preparation of the GCT JCS, including testing and reporting through SA. There are also limited possibilities for local sites in the Gloucester area. Potential site allocation options were investigated and tested through SA using the SA framework of objectives in a comparable and consistent manner. The findings were reported in the SA Report (July 2019) and detailed in Appendix IV (October 2016 and updated March-July 2019). The reasons for selecting and rejecting site options were outlined in Table 6.2 and in accordance with the requirements of the SEA

¹⁰ <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan/>

¹¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Regulations. The reasoning for further amendments to the site allocations is discussed in the SA Addendum Report (April 2022) that accompanied the proposed Main Modifications to the Plan on public consultation.

- 29 The 'do-nothing' scenario is not an option for a Local Plan as councils are required to provide for their identified development needs. However, this was considered by the SA process and the SA reported that significant negative effects on environmental factors were likely without a plan and that positive effects for socio-economic factors were less likely to be implemented. Doing nothing is not a reasonable alternative for the GCP since an approach with locally relevant Policies and local (non-strategic) site allocations is required to avoid negative effects and ensure a sustainable delivery of the required development in the Gloucester area and as identified in the JCS (Policies SP1 and SP2).
- 30 Overall, the reasons for choosing the Gloucester City Plan as adopted include that the adopted Plan progresses the overall Vision and for high quality development in the Gloucester City area, contributes to meeting the identified needs for housing and employment whilst avoiding significant change to the intrinsic character of the area and securing the most benefits and the least negative effects for sustainable development.

Measures that are to be taken to monitor the significant sustainability/ environmental effects of the implementation of the Local Plan

- 31 The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports¹² on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan.
- 32 The GCT JCS includes Part 7 on Monitoring & Review, and Gloucester City Council undertakes various monitoring. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage and provide information on the predicted effects from the SA. No additional proposed monitoring that might be required as part of the SEA process was indicated from the findings of the SA.

¹² Gloucester City Annual Monitoring Reports available at: <https://www.gloucester.gov.uk/planning-development/planning-policy/annual-monitoring/>