



**GLOUCESTER CITY PLAN
2016-2031
Main Modifications**

SUSTAINABILITY APPRAISAL (SA)

**(Integrating Strategic Environmental
Assessment, Health Impact Assessment,
Equality Impact Assessment, Habitats
Regulations Assessment)**

**SA Addendum Report
April 2022**

enfusion



Gloucester City Council Gloucester City Plan (2016-2031): Main Modifications

SUSTAINABILITY APPRAISAL (SA): Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA); Habitats Regulations Assessment (HRA)

Sustainability Appraisal Addendum Report April 2022

<i>date:</i>	December 2021 Draft v01 December 2021 Draft v02 April 2022 Final Draft v03	
<i>prepared for:</i>	Gloucester City Council	
<i>prepared by:</i>	Barbara Carroll	Enfusion
<i>quality assurance:</i>	Barbara Carroll	Enfusion

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1.0 INTRODUCTION

The Gloucester City Plan (GCP): Submission & Examination

- 1.1 The Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS) (plan period 2011 to 2031) sets out the housing and employment needs for the Gloucester City area, including the strategic direction for development growth and strategic policies. GCC is preparing a 'Part 2' Local Plan that 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.
- 1.2 The GCT JCS¹ (adopted December 2017) 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. The GCT JCS therefore identifies strategic allocations around Gloucester to meet the residual need. Strategic allocations in the GCT JCS are at Policy A1 Innsworth and Twigworth, Policy A2 South Churchdown, Policy A3 North Brockworth, and Policy A6 Winnycroft.
- 1.3 The GCP allocates non-strategic sites and local policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031. The GCP has been prepared in accordance with national planning requirements and iteratively informed through continuing technical studies, as well as wide consultation with the public, stakeholders, and the regulators. The proposed draft GCP was submitted to the Secretary of State for independent examination by a Planning Inspector on 18th November 2020. Hearing sessions were held virtually between 11 May and 9 June 2021.
- 1.4 The Inspector advised in her Post Hearings Letter [EXAM25] (19 August 2021)² that she considered that the draft GCP could be made sound through Main Modifications. The Inspector also confirmed that the proposed MMs should be subject to further Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) as necessary; these addendum reports should be published as part of the MM consultation. The MMs will be subject to public consultation and the Inspector's final conclusions will be reached taking into account any representations, including on the SA and HRA.

¹ <https://www.jointcorestrategy.org/>

² <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan-examination-library/>

Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA)

- 1.5 The emerging elements of the draft Gloucester City Plan have been tested through SA, integrating requirements for Strategic Environmental Assessment (SEA), Health & Equality Impact Assessment (EqIA), and Habitats Regulations Assessment (HRA). Each draft of the GCP has been accompanied by SA and HRA Reports through the various consultation stages of plan-making. Representations to the SA and HRA reports have been taken into consideration in the following iteration of assessments and plan-making, as appropriate and relevant.
- 1.6 The SA and HRA studies have been undertaken by independent specialists, Enfusion Ltd. The SA/SEA [CD005] and HRA [CD006] reports³ were submitted as evidence supporting the Local Plan. The Inspector raised certain Matters, Issues & Questions prior to the hearing sessions and these included queries regarding the SA/SEA, EqIA & HRA for Matter 1 Legal Compliance, SA & Duty to Cooperate. The Council prepared a written statement that responded to queries relating to these assessments. The SA/SEA and HRA reports were discussed during the hearing session for Matter 1 on 11 May 2021.
- 1.7 Representations and written statements to Matter 1 of the hearing sessions were provided by three organisations in addition to Gloucester City Council. There were no representations from the environmental regulators/statutory environmental consultation bodies. Of the 3 respondents, only one (an agent acting for developers/land owners) raised concern about the SA/SEA, in particular for the site known as Land east of Winnycroft Lane. The respondent asserted that the SA does not consider the potential to mitigate constraints in all sites considered unsuitable through the Strategic Assessment of Land Availability (SALA).
- 1.8 All sites tested by the SA and proposed in the Plan as allocations had been assessed through the SALA process. In terms of the SALA's assessment of heritage constraints on sites the Council has made its position clear [EXAM 21 GCC Note Heritage Assessments]. In her post hearings letter [EXAM 25], the Inspector did not raise any concerns about the selection of site allocations, their sifting through the SALA process or their assessment through the SA. It may be noted that the site known as Land east of Winnycroft Lane was not considered by the Council to be a reasonable alternative through the SALA and on advice from the Heritage team and Historic England. Therefore, it was not considered further through the SA process.
- 1.9 The Inspector did not raise any concerns regarding the SA/SEA and HRA in her Post Hearings Letter [EXAM25]. She advised that the requirements for SA/SEA and HRA should be met by producing addendum reports as necessary and that these should be subject to consultation with the MMs. The Inspector has also requested that the Council undertake an SA of the site Land east of Winnycroft Lane (SALA Ref: 06NEW17) and that this should be included in the updated SA to accompany the Main Modifications to the GCP on public consultation.

³ <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan-examination-library/>

Purpose & Methods for the SA & HRA Addendum Report

- 1.10 This SA Addendum constitutes part of the SA/SEA Report submitted [CD005] - for the purposes of demonstrating compliance with SA and SEA requirements. It also addresses updating of the HRA [CD006] Report. This Addendum Report only addresses the implications for the assessments with regard to the potential MMs; it does not reconsider any other aspects of the Plan. Thus, the purpose of the SA Addendum is to assess those proposed MMs that are likely to have significant effects and to demonstrate that the requirements for SA, SEA and HRA have been met.
- 1.11 A pragmatic and proportionate approach has been taken to the assessments. The MMs have been screened using professional judgment to assess their likely significance with regard to SA/SEA and HRA. Those MMs that were considered to be significant have been further assessed using the same method and SA Framework of Objectives (Table 2.1 CD005) and the implications for the previous findings considered. Any MMs that are relevant to the previous HRA findings have also been considered and the HRA updated within this SA Addendum Report.
- 1.12 In order to meet with the Inspector's request, the site Land east of Winnycroft Lane has been subjected to SA in a consistent and comparable manner as far as possible to the other development site options. The SA was undertaken using the same SA framework of objectives and available evidence – the findings are presented in the appendix to this Addendum Report and summary discussion provided in section 4.

2.0 SCREENING THE MAIN MODIFICATIONS (MMs) FOR SA & HRA SIGNIFICANCE

2.1 The Inspector has suggested Main Modifications that she considers could make the draft GCP sound. The MMs [EXAM xx] were screened for their significance with regard to SA, SEA and HRA, as set out in the following Table 2.1. It may be noted that some proposed modifications are to provide greater clarity, correct errors, avoid repetition, for consistency, and for updating (for example, with national policy changes), and as such may not be significant for the findings of the assessment processes and are not included in this summary table.

Table 2.1: Screening the MMs for SA & HRA Significance

MM No.	GCP Policy/ Paragraph	Summary of Changes	Significant for SA/SEA or HRA?
MM1 & MM2	Relationship with JCS	Additional text for clarification & updating	No
MM3	Para 2.16	Wording strengthened in relation to efficient use of resources, waste reduction, and greater use of sustainable transport	No
MM4	Vision	Additional wording " <i>and building resilience and adaptability to...</i> (climate change)"	Yes
	Key Principle 1	Additional wording "..." <i>low carbon city, which is resilient and adaptable to a changing climate, brings regeneration benefits, promotes sustainable development, incorporating measures to reduce waste, and makes the most efficient use of brownfield land and the reuse of vacant and underused buildings and space.</i> "	Yes
MM5	Development needs & Strategy	Additional words for updating & clarification, including updating of housing figures with shortfall updated from 900 to 1,042 dwellings.	No
		Additional text relating to employment land & including updating of allocation from 14.6 to 8.1 hectares.	No
		Additional text providing clarification & further information regarding gypsy & traveller communities and windfall development.	No
MM6	Housing	Additional text providing clarification & further information; updating of housing trajectory	No
MM7	A1 effective & efficient use of land & buildings	Additional text for clarification. Additional clause 7 - <i>Be well-designed to create and support healthy living conditions</i>	Yes
MM8	New Policy – Houses in Multiple Occupation	New policy	Yes

MM9	A2 Affordable Housing	Policy & supporting text deleted & consequential amendment to Policy A5 – see MM11	
MM10	A4 Student Accommodation	Minor additions for clarification	No
MM11	A5 Specialist Housing	Additional text for clarification & further information. Criterion 4 – additional text - <i>Will not lead to harm through over concentration in the local area, including but not limited to:</i> <ul style="list-style-type: none"> a. <i>Levels of activity that cause excessive noise and disturbance to local residents</i> b. <i>Excessive demand on social infrastructure, such as health and social care and police services</i> c. <i>Significantly reducing housing choice in the local area, preventing the existence of a mixed and balanced community.</i> 	Yes
MM12	A6 Accessible & Adaptable Homes	Change from 50 to 25%; additional text - <i>4% of affordable homes should be wheelchair accessible to meet identified need on the City Council's Housing Register. Provision shall comprise of affordable rented homes to which the City Council will allocate households to;</i> and explanation regarding exceptions.	No
MM13	A7 Self-build & custom-build	Minor additions for clarification	No
MM14	Employment Development	Additional text for clarification & further information relating to the JCS & the GCP & employment land	No
MM15	B1 Employment & skills	Amendments & additional text for clarification & further information	No
MM16	B2 safeguarding employment	Amendments & additional text for clarification & further information	No
MM17	B3 New employment development	Amendments & additional text for clarification & further information & new criterion - <i>Provision is made for the delivery of efficient and effective commercial waste collection services.</i>	No
MM18	B4 development Gloucester Docks	Criterion 2 rewritten - <i>Development will be expected to respond to the significance of the historic docks conservation area and other individual heritage assets, ensuring new development makes a positive contribution to its character and distinctiveness</i> & new criterion 5 re existing businesses.	Yes

MM19	B6 Public Houses	Additional text to provide further guidance re marketing & sale; new supporting text explaining re needs of local community.	No
MM20	C1 Active design & accessibility	Additional wording - <i>meet the highest possible standards of accessible and inclusive design</i> and new criterion 3 <i>The development will support healthy active lifestyles by facilitating participation in physical activity by incorporating the following active by design principles</i> with clauses a-g providing details	Yes
MM21	C3 public open space	Amendments for clarification; additional criterion - <i>For public open spaces, an assessment demonstrates the site is of low value and of poor quality, with no opportunities for improvement and is surplus in terms of all functions that open space can provide</i>	No
MM22	C4 Hot Food takeaways	Amendments for clarification	No
MM23	C6 Cordon Sanitaire	New text - <i>Planning permission will be granted for development within the Cordon Sanitaire, as shown on the policies map, where it can be clearly demonstrated through a robust odour assessment that: 1. The users/occupants of the proposed development will not be adversely affected by odour nuisance; and 2. The introduction of the proposed use will not adversely affect the continued operation of the Netheridge Sewage Treatment Works.</i> Provides more explanation – overall no significant effects for SA findings. Additional supporting text for further information & including details on waste management; guidance for odour assessments, & acknowledgement re no prejudice of NSTW's operations.	No
MM24	C8 changing Places toilets	Amendments & additional text for clarification	No
MM25	D1 Historic Environment	Rewording – <i>“preservation ment sustaining or enhancing of its significance”</i> Additional text - <i>Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification</i>	Yes
MM26	D2 Non-designated historic	Amended wording - <i>Development affecting a non-designated heritage asset, or its setting, should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact</i>	Yes

		<i>and the significance of the heritage asset will be considered</i>	
MM27	D4 shopfronts	Amendments & additional text for clarification & further information	No
MM28	Natural environment – Introduction	New paragraph explaining that part of the GCP lies within the SW Marine Plan area – for further information	No
MM29	E1 Landscape	Delete policy as this issue is covered by the JCS	No
MM30	E2 Biodiversity Geodiversity	Amendments for updating	No
MM31	E3 Nature Recovery	Amendments for updating	No
MM32	E4 Trees	Minor additions for clarification; additional text - <i>All new streets must be tree-lined unless, in specific circumstances, it can be demonstrated that there are clear, justifiable and compelling reasons why this would be inappropriate</i> New supporting text relating to maintenance, protection of veteran trees, & protection of wild birds	Yes
MM33	E5 Green/Blue infrastructure	Additional wording to include supporting text details for blue infrastructure & further information	Yes
MM34	E6 Flooding	Additional wording for clarification - <i>opportunities provided by new development should be used to reduce the causes and impacts of flooding in the area and beyond, through the layout and form of development, and the appropriate application of sustainable drainage systems and, where appropriate through the use of natural flood management techniques.</i> New supporting text on early flood risk assessment, and upstream natural flood management.	Yes
MM35	E7 Renewable energy R Severn & Canal	Additional text advising re need to consider the SW Marine Plan	No
MM64	E8 Cotswold Beechwoods SAC	Reference to external studies, guidance or policy documents from policy text	No
MM36	F1 Materials	Additional text for clarification	No
MM37	F2 Landscape & Planting	Amendments & additional text for clarification & further information	No
MM38	F3 community safety	Additional wording " <i>and cycle routes</i> " Additional supporting text for further information	No
MM39	F5 open plan estates	Amendments for clarification	No
MM40	F6 space standards	Amendments for clarification	No

MM41	Sustainable living, transport & infrastructure – Introduction	New paragraphs on climate change, requirements for Energy & Waste Minimisation Statements, and energy efficiencies	No
MM42	G1 sustainable transport	New policy text on requirements for parking of private vehicles & provision of cycle parking New supporting text on cycle parking design & car parking	Yes
MM43	G2 Charging for EVs	Amendments for clarification ⁴	No
MM44	G3 Cycling	Additional text - <i>All developments must provide safe and secure access by cycle</i>	Yes
MM45	G4 Walking	Change from “should” to “must”	Yes
MM46	G6 Telecommunications	Amendments & additional text for clarification & further information	No
MM47	G8 Review	Priority to delivery of affordable homes over other policy requirements deleted	No
MM49	Site allocations	SA03 Former Prospect House, increase residential capacity to 60 dwellings. SA04 Former Wessex House, increase residential capacity to 40 dwellings. SA05 Land at Great Western sidings, increase residential capacity to 300 dwellings. SA18 Jordan's House, reduce residential capacity to 10 dwellings.	Yes
MM50	Site allocations	Delete SA08: King's Quarter. Delete SA12 Land at Rea Lane, Hempsted.	Yes
MM51	Site allocations – employment	Delete SA07: Lynton Fields, Land east of Waterwells Business Park. Delete SA22: land adjacent to Secunda Way	Yes
MM52	Site allocations - MCAs	Include refs to MCAs in site allocations where relevant	No
MM53	MCAs & contamination	Include refs for one site	No
MM54	MCAs & mitigation	Include refs for mitigation for 3 sites	No
MM55	SA03 67-69 London Rd	Amend red line boundary & requirements relating to biodiversity	Yes
MM56	SA09 Blackfriars	Amend regarding engagement with EA re flood improvements	Yes
MM57	SA10 car park	Replace mixed use with main town centre uses	No

⁴ Please note that following the publication of new building regulations, this policy is considered redundant and is proposed for deletion through the Main Modifications. See EXAM26 and EXAM26A for further information.

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MM58	SA11 Rear of Retail Park	Amend regarding ground & surface water quality Additional information – overall not significant for the SA	No
MM59	SA15 S of Winnycroft	Amend as per flood mitigation Additional information – overall not significant for the SA	No
MM60	SA16 Lwr Eastgate St	Delete requirement for green roofs Overall, not significant for the SA	No
MM61	SA21 Part of West Quay	Amendment for clarification re redevelopment scheme	No
MM62	Relationship with other plans	Amendments for clarification	No
MM63-66		Amendments & updating	No
	Policies Map	Amendments & updating	No

3.0 SA OF MAIN MODIFICATIONS (MMs)

- 3.1 **Vision & Key Principle 1:** The additional wording “*and building resilience and adaptability to... (climate change)*” to the Vision for the GCP strengthens by providing explicit commitment to planning for climate change. The additional wording to Key Principle 1 ...” *low carbon city, which is resilient and adaptable to a changing climate, brings regeneration benefits, promotes sustainable development, incorporating measures to reduce waste, and makes the most efficient use of brownfield land and the reuse of vacant and underused buildings and space.*” clarifies and also makes explicit the development principles for low carbon and waste. The SA had found no significant incompatibilities between the GCP Vision & Key Principles, with the exception of objectives for waste. The SA had noted the complex inter-relationships between these Principles and the SA Objectives. The SA had recommended that waste should be included, and this has now been progressed with positive effects for overall sustainable development principles.
- 3.2 **Development Strategy:** Additional text relating to employment land and including updating of employment allocations from 14.6 to 8.1 hectares as a result of sites no longer being available or gaining planning permission.
- 3.3 **Policy A1 Effective and efficient use of land and buildings:** Additional text for clarification and an additional clause 7 “*Be well-designed to create and support healthy living conditions*”. The additional clause making explicit the requirement for creating and supporting healthy living conditions will strengthen the positive effects found by the SA and particularly with regard to SA Objective No 17 Improve Health & Wellbeing.
- 3.4 **Policy A2 Houses in Multiple Occupation:** New policy recognising that houses in multiple occupation (HMOs) that were originally intended for a single household and have since been converted into a large HMO require planning permission. Whilst HMOs can provide a valuable housing option for many people with likely positive effects for SA Objective No 18 Housing, high concentrations of HMOs can have negative effects on the character of the area and the amenities enjoyed by existing residents – SA No 8 Landscape, No 9 Townscape, and No 14 Access to Services/Facilities. The new policy aims to ensure an appropriate balance with a suitable housing mix and to limit the numbers of HMOs in locations. This approach provides mitigation measures for potential negative effects on character and amenities for existing residents.
- 3.5 **Policy A5 Specialist Housing:** Additional text for clarification and further information. Criterion 4 has additional text – “*Will not lead to harm through over concentration in the local area, including but not limited to: Levels of activity that cause excessive noise and disturbance to local residents; Excessive demand on social infrastructure, such as health and social care and police services; Significantly reducing housing choice in the local area, preventing the existence of a mixed and balanced community.*” This provides further explanation and guidance for a specific category of housing that will contribute to mitigating any likely negative effects for SA No

11 Noise & Light Pollution, No 17 Health Facilities, and No 18 Housing. This additional clarification will help better guide developers but is unlikely to affect the previous findings of the SA for neutral or positive effects.

- 3.5 **Policy B3 New employment development:** Amendments and additional text for clarification with further information and a new criterion – *“Provision is made for the delivery of efficient and effective commercial waste collection services.”* This makes explicit the requirement for commercial waste management and will support SA objectives for sustainable waste. However, it is not significant with regard to the previous SA findings.
- 3.6 **Policy B4 Development at Gloucester Docks:** Criterion 2 rewritten – *“Development will be expected to respond to the significance of the historic docks conservation area and other individual heritage assets, ensuring new development makes a positive contribution to its character and distinctiveness”* with new criterion 5 requiring that new development would not affect the functioning of existing businesses. The rewriting of criterion 2 and the provision of a new criterion 5 provide clarification but are not significant with regard to the previous SA findings.
- 3.7 **C1 Active design & accessibility:** Additional wording – *“meet the highest possible standards of accessible and inclusive design”* and new criterion 3 *“The development will support healthy active lifestyles by facilitating participation in physical activity by incorporating the following active by design principles”* with clauses a-g providing comprehensive details on connected communities; connected walking, running and cycling routes; co-location of community facilities; network of multifunctional open space; high quality streets and spaces; legible places; and appropriate infrastructure.
- 3.7 The submitted SA Report (section 5 & 6 EXAM005) had found minor positive effects for the plan including Policy C1 to accessibility/sustainable transport (SA No 6) and health/equality (SA Nos 16, 17, 19, 20, 21 & 22) objectives. The additional wording for *“highest possible standards for accessible and inclusive design”* strengthens the policy requirements indicating the likelihood of more positive effects being implemented. The new criterion No 3 provides comprehensive detailed guidance to developers and their agents – particularly explaining the interconnectedness and multifunctionality of sustainable transport, open spaces and high-quality design for development. This strengthening of policy requirements with explicit consideration of connectivity and multifunctionality should strengthen the findings of the SA towards major positive effects for accessibility and health/equality objectives.
- 3.8 **D1 Historic Environment:** Additional text - *Great weight will be applied to the conservation of designated heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm will require clear and convincing justification.”* **D2 Non-designated historic assets:** Amended wording – *“Development affecting a non-designated heritage asset, or its setting, should protect and where appropriate enhance its significance. Where harm is likely to occur, the scale of the impact and the significance of the heritage asset will be considered.”*

- 3.9 The submitted SA Report (section 5 & 6 EXAM005) had found the plan including Policies D1 & D2 (and JCS Policy SD9) to provide sufficient mitigation measures to ensure that development will not lead to any significant negative effects on the historic environment and cultural heritage. The additional text in Policy D1 makes explicit the great weight applied to designated heritage assets, and the further amendments to Policy D2 provides clarification. This further strengthening of Policies D1 & D2 makes clear the requirements from new development and confirms that such consideration for the historic environment will be implemented confirming effective mitigation measures and at least neutral or no significant negative effects on SA objectives (No 9).
- 3.10 **Policy E4 Trees, woodlands, and hedgerows:** Minor additions for clarification; and additional text – *“All new streets must be tree-lined unless, in specific circumstances, it can be demonstrated that there are clear, justifiable and compelling reasons why this would be inappropriate”*. New supporting text relating to maintenance, protection of veteran trees, and protection of wild birds.
- 3.11 The submitted SA Report (section 5 & 6 EXAM005) had found the plan including Policy E4 will not lead to any significant negative effects on biodiversity (SA No 1). The new requirement that all new streets should be tree-lined is likely to contribute to positive effects for objectives on biodiversity (SA No 1); air quality and health – mental and physical (SA Nos 11, 17); and longer-term objectives for climate change (SA No 3).
- 3.12 **Policy E5 Green/Blue Infrastructure:** Additional wording to include supporting text details for blue infrastructure and provision of further information. The addition of “blue” makes explicit that green infrastructure should consider the water environment and its wider role in sustainability including flood management and biodiversity/ecosystem services. Making explicit the role of the water environment and the links between blue and green infrastructure will strengthen the policy with more positive effects and better ensuring no significant negative effects on the water environment and its multifunctionality.
- 3.13 **Policy E6 Flooding, sustainable drainage, and wastewater:** Additional wording for clarification – *“opportunities provided by new development should be used to reduce the causes and impacts of flooding in the area and beyond, through the layout and form of development, and the appropriate application of sustainable drainage systems and, where appropriate through the use of natural flood management techniques.”* New supporting text on early flood risk assessment, and upstream natural flood management.
- 3.14 The updating and additional wording for clarification enhances the policy requirement to consider natural flood management and the wider flood/water catchment. The submitted SA Report (section 5 & 6 EXAM005) had found the plan including Policy E6, and together with JCS Policy INF3, provided sufficient mitigation to ensure that there will be no significant negative effects on flood risk. The enhancement of the policy strengthens the effectiveness of the policy.

- 3.15 **G Sustainable Living, Transport, and Infrastructure:** Introductory and context section has new paragraphs on climate change, requirements for Energy and Waste Minimisation Statements, and energy efficiencies. This further explanation will help guide developers, particularly with regard to GCP Policies that relate to climate change and thus, contribute to their effectiveness and mitigation of significant negative effects on SA objective Nos 2 & 3.
- 3.16 **Policy G1 Sustainable Transport and Parking:** New policy text on requirements for parking of private vehicles, including the need to ensure adequate provision of spaces for charging plug-in and other ultra-low emissions vehicles, and provision of cycle parking. New supporting text on cycle parking design and car parking. The additional specific text on cycle requirements will contribute to sustainable transport objectives (SA No 6) and overall, contribute to climate change objectives (SA No 3) with positive effects.
- 3.167 **Policy G3 Cycling:** Additional text – “*All developments must provide safe and secure access by cycle*” reinforces the findings of the SA that this policy will have positive effects for sustainable transport objectives (SA No 6).
- 3.18 **Site Allocations:** Updating of Site Allocations to reflect the examination and discussions, also, to reflect those sites where planning permission has now been permitted and/or development has progressed. Initial SA of site options is detailed in Appendix IV and further discussed as options progressed to proposed allocations in sections 5 and 6 of the submitted SA Report [EXAM005].
- 3.19 **SA03 Former Prospect House 67-69 London Road:** Increase in residential capacity from 30 to 60 dwellings. The initial SA had found mostly positive or neutral effects with no significant negative effects. Site specific requirements include the need for an archaeological assessment, retention of trees, and use of green walls/roofs – thus providing mitigation measures for any potential effects on SA Nos 1 & 9. There appears no reason why the capacity should not be increased, and this will enhance the positive effects previously identified for SA objectives on housing and health (Nos 18 & 17), and the major positive effects found for SA objectives on city centre and inequalities (Nos 14 & 16). The requirements relating to biodiversity (MM55) have been amended and this will further confirm the effectiveness of such mitigation measures and ensuring some biodiversity gain.
- 3.20 **SA04 Former Wessex House, Great Western Road:** Increase in residential capacity from 20 to 40 dwellings. The initial SA had found mostly positive or neutral effects with only uncertain minor negative effects associated with SA objectives for sustainable transport (SA No 6). Site specific requirements include the need for improved pedestrian links, an archaeological assessment, and use of green walls/roofs – thus providing mitigation measures for any potential effects on SA Nos 1, 6 & 9. There appears no reason why the capacity should not be increased, and this will enhance the positive effects previously identified for SA objectives on housing and health (Nos 18 & 17).

- 3.21 **SA05 Land at Great Western Sidings:** Increase in residential capacity from 200 to 300 dwellings. The initial SA had found mostly positive or neutral effects with only uncertain minor negative effects associated with SA objectives for sustainable transport (SA No 6). Site specific requirements include the requirements for a new strategic cycle and footpath linking to the city centre, built heritage and archaeological assessment, public open space and facilities, and green corridor – thus providing mitigation measures for any potential effects on SA Nos 1, 6, 9, 20 & 25. There appears no reason why the capacity should not be increased, and this will enhance the major positive effects previously identified for SA objectives on housing and health (Nos 18 & 17).
- 3.22 **SA07 Lynton Fields, Land east of Waterwells Business Park:** This employment allocation has been removed as there is not a willing landowner.
- 3.23 **SA08 Kings Quarter:** This housing allocation has been removed as it now has planning permission. This is significant for the SA; it does not change the findings of the SA, but the delivery of such allocated housing confirms the outcomes with positive effects for provision of high-quality housing in the most sustainable places and with the effectiveness of mitigation measures implemented such that there are no significant residual negative effects.
- 3.24 **SA09 Former Quayside House, Blackfriars:** Amendments regarding engagement with the Environment Agency in relation to flood risk improvements along the River Severn as part of a wider regeneration scheme. This will strengthen mitigation measures with regard to effects on the water environment.
- 3.25 **SA12 Land at Rea Lane Hempsted:** This housing allocation has been removed as it now has planning permission.
- 3.26 **SA18 Jordan's House:** Reduction in residential capacity from 20 to 10. This reduces the potential minor negative effects on the townscape that had been identified by the initial SA and retains the positive effects for SA objectives on housing and health.
- 3.27 **SA22 Land adjacent to Secunda Way:** This allocation has been removed as it is not available.

Habitats Regulations Assessment

- 3.28 Natural England and the Inspector advised at the hearings that they had no issues with the HRA and agreed with its conclusions that there would be no adverse effects on the integrity of protected sites. The Inspector did not raise any issues for the HRA in her post-hearings letter [EXAM25]. The SA has screened the MMs for significance and the changes to site allocations will not have any significant effects for the designated sites. Therefore, the previous findings of the HRA/AA remain relevant and valid - the Gloucester City Plan will not have adverse effects on the integrity of protected sites, alone or in combination.

4.0 SA OF ADDITIONAL SITE

- 4.1 The Inspector suggested to the Council that the site Land east of Winnycroft Lane should be subjected to SA. During early preparation of the draft GCP, this site (SALA ref: 06NEW17) was not considered a reasonable alternative due to concerns about negative effects on the nationally protected Scheduled Monument Sneedham's Green – a medieval moated site – and its setting in open countryside. Therefore, the site Land east of Winnycroft Lane has been assessed in a consistent and comparable manner to the other development site options (that were considered to be reasonable alternatives) as far as possible. The SA was undertaken using the same SA framework of objectives and available evidence.
- 4.2 The findings of the SA are presented in the Appendix 1 of this SA Report. Several positive effects were identified, including major positive effects for housing and inequalities SA objectives due to the size of the development proposed (approximately 100-140 dwellings) and the associated likely proportion (at least 20%) of affordable housing (subject to viability). Minor positive effects were found for SA objectives accessibility and availability of open/green space. Also, potential minor positive effects for biodiversity, water quality and flood risk – but with some uncertainty as the effectiveness of mitigation measures is unknown. There are Great Crested Newts in the moat, and the water environment is inter-related with open fields currently draining into the moat with a balanced hydrology. Neutral effects are likely for pollution/amenity objectives – including through other GCP and JCS policies – but some uncertainty as the moat and its archaeological assets may be sensitive to run-off. The site is only proposed for housing and thus, neutral effects for employment/economy SA objectives.
- 4.3 Minor negative effects were indicated due to the distance of the site from sustainable transport modes, distance from the city and other local centres, and its distance from existing health and educational facilities. Some concern had been expressed with regard to highways during previous consultation, such that in consideration of the size of development potential for minor negative effects on SA 6a but with some uncertainty as mitigation measures such as junction improvements may be effective. As with all the site options on greenfield, minor negative effects were found for soil quality as the soil resource will be permanently lost.
- 4.4 The SA found major negative effects for proposed development on the protected Scheduled Monument of Sneedham's Green and its setting. The effects on this nationally protected heritage asset had been raised at earlier iterations of plan-making and consultation representations. Accordingly, the Council had investigated further and both Historic England (the statutory body for the historic environment) and conservation/archaeology specialists consider that development on the site would cause harm to the significance of the monument by removing its rural setting.
- 4.5 Therefore, the findings of the SA indicate that the additional site Land East of Winnycroft Lane & North of Green Lane is not suitable for consideration as a

site allocation in the GCP due to likely major negative effects on the historic environment with uncertainty about the effectiveness of any mitigation possibilities. There are also some concerns about the effectiveness of mitigation measures for the minor negative effects found for biodiversity (nationally protected Great Crested Newts) and the sensitivity of the landscape.

5.0 SUMMARY & NEXT STEPS

- 5.1 The proposed draft Gloucester City Plan was submitted to the Secretary of State for independent examination on 18th November 2020. Hearing sessions were held virtually between 11 May and 9 June 2021. The Inspector advised in her Post Hearings Letter [EXAM25] (August 2021) that she considered the GCP to be a plan that could be found sound subject to Main Modifications (MMs). The Council prepared draft MMs and submitted these to the Inspector for comment during November 2021.
- 5.2 The implications of the MMs on the findings of the previous SA/SEA and HRA/AA have been investigated. The MMs were screened for their significance with regard to the assessment processes. It was noted that many amendments are for updating and to provide further clarity and as such are not significant for SA and HRA.
- 5.3 Those MMs identified as potentially significant for SA/SEA and HRA/AA were then considered using the same methods and assessors as for the submitted SA and HRA Reports. Many of the MMs were refinements that strengthened policies through making certain requirements explicit, for example, for blue infrastructure, provision of street trees, safe and secure access by cycle. Policies and supporting text were enhanced in particular with regard to consideration of climate change, thus updating the plan in the light of recent concern and commitments. It is appreciated that further updating of JCS Policies will address climate change at the strategic level where interactions and interrelationships may be more meaningfully considered.
- 5.4 Two housing site allocations have been removed as the sites have now received planning permission. Such implementation will confirm the positive effects identified by the SA for housing, community, and health objectives. Four housing site allocations have been increased in capacity – with increased positive effects for housing and community objectives – overall, the major positive effects for meeting identified housing need are thus maintained. It is considered that mitigation measures through policy requirements remain sufficient to ensure no significant residual adverse effects. Two employment allocations have been deleted since it was determined that the sites were unavailable and therefore not deliverable. Overall, the employment land is still met such that the findings of the SA are still valid.
- 5.5 Overall, 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/AA remain relevant and valid - the GCP will not have adverse effects on the integrity of protected sites, alone or in combination.
- 5.6 The proposed MMs will be subject to public consultation commencing early in 2021, including this SA Addendum Report. The Inspector will consider any

representations made and then her final report will be likely published in Spring 2022. Upon adoption of the modified Plan, an SA Adoption Statement will also be prepared and published, in accordance with regulatory requirements.

- 5.7 The Inspector requested that the Council should undertake SA of an additional site – Land east of Winnycroft Lane. The site has been subject to SA in a consistent and comparable manner as far as possible using the same SA framework of objectives and published evidence. The SA findings are detailed in Appendix I. The site is in the red risk zone for Great Crested Newts a nationally protected species with uncertainty for effectiveness of mitigation measures. The site is greenfield but located within an area of medium landscape sensitivity⁵ that was found to be not suitable for development. The site is also a sensitive historic landscape, and the possibilities for mitigation are uncertain such that at least minor negative effects for landscape.
- 5.8 The site contains the nationally protected Scheduled Monument of Sneedham's Green moated site. It survives well and is designated since the moat and island will contain remains of medieval structure and archaeological information. 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 – most were supported by rich farmland, and it is that link with the countryside that provides a substantial part of the monument's significance. Therefore, likely major negative effects on the setting of the scheduled monument in its rural location.
- 5.9 Currently the surrounding to the moat is waterlogged grassland and the hydrology of the area is balanced. It is possible that this hydrological balance with waterlogged deposits in the moat have enabled preservation of archaeological remains. It is likely that with the level of proposed development and associated hard-standing and urban run-off, there will be some effects on the local hydrology that may result in physical harm to any below ground archaeological remains. Therefore, there is an element of uncertainty for the significance of negative physical effects arising from any changes to hydrology and effects on any archaeological remains in the moat deposits until site level assessments have been completed.
- 5.10 An SA has been undertaken of the site and found major negative effects for the historic environment. Mitigation measures would be difficult to resolve the negative impacts on the Scheduled Monument and its setting in the countryside - which is an integral part of its national designation. It is unlikely that Historic England would support any proposed development⁶.
- 5.11 Therefore, the findings of the SA indicate that the additional site Land East of Winnycroft Lane & North of Green Lane is not suitable for consideration as a

⁵<https://www.gloucester.gov.uk/media/1110/jcs-landscape-characterisation-assessment-and-sensitivity-analysis-september-2013.pdf>

⁶ [HIS007/a] <https://www.gloucester.gov.uk/media/3789/land-north-of-green-farm-background-note-september-2019.pdf>

site allocation in the GCP due to likely major negative effects on the historic environment with uncertainty about the effectiveness of any mitigation possibilities.

Appendix 1: SA of Additional Site

SA Significance Key

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

Site: Land East of Winnycroft Lane & North of Green Lane Size & Approx. Capacity: 7.9ha, number of dwellings - approximately 100-140 Site Ref: SALA 06NEW17																	
SA Objectives	Biodiversity	Water Quality	Flood Risk	Sustainable Transport & Traffic		Soil Quality	Townscape / Landscape	The Historic Environment	Pollution & Amenity	Economy & Employment	City Centre & Local Centres	Inequalities	Health Facilities Access	Housing	Public Open Space	Education	Cultural Heritage
	1	4	5	6	7	8	9	11	12-13	14	16	17	18	19-20	24	25	
SA Summary	?	?	+	-?	-	-	-	--?	0?	0	-	++	-?	++	+	-	?

Sustainability Appraisal commentary:

It is estimated that the site could deliver approximately 100-140 new dwellings with the potential for major long-term positive effects against SA Objective 18.

The site is located within one of the most deprived 10% nationally for the overall Index of Multiple Deprivation (IMD) – one of 12 such areas Lower Level Super Output Areas (LSOAs)⁷ in Gloucestershire & therefore, new development could contribute to reducing inequalities, with the potential for major long-term positive effects against SA Objective 16 – with at least 20% affordable housing indicated (subject to viability).

The site is not located within or in close proximity to any nationally designated biodiversity; however, it is located within the outer SSSI Impact Risk Zone with respect to the SSSI/Special Area of Conservation (SAC) of the Cotswold Beechwoods⁸ and as such any new residential accommodation will require a Habitats Regulations Assessment (HRA) to consider recreational disturbance on the SAC. Great Crested Newts have been confirmed on the site (SALA) and these are legally protected species such that development must avoid disturbing them and their habitats. The site is in the red risk zone for Great Crested Newts as per the District License Newt Map for Gloucester. This means it is a '*highly suitable habitat – the most important areas for Great Crested Newts*'. Great Crested Newts are a European protected species. The animals and their eggs, breeding sites and resting places are protected by law. If their presence were confirmed on site a licence for development would have to be obtained from Natural England or an application could be made through the District Licensing scheme – therefore, uncertainty about the possibilities for effective mitigation options at this stage and minor negative effects indicated for SA Objective No 1 Biodiversity.

All new development must now provide for net gains in biodiversity (para 174 NPPF 2021)⁹ and therefore, minor positive effects potentially indicated for SA Objective 1. However, concern whether such biodiversity gain could be achieved on-site, and concern about the presence of the legally protected newts in the moat and surroundings and the effectiveness of any mitigation measures. Therefore, overall, uncertainty of effects and their significance.

The site is not located in any source protection Safeguard Zones for surface or groundwater. It is understood that water from an open field drains into the moat and that the hydrology is balanced.

The site is located within Flood Zone 1¹⁰ indicating that there is low risk of surfacewater flooding and therefore, potentially minor positive effects for SA Objective 5. However, the open fields and moat effectively act to absorb heavy rainfall and it is uncertain how this would be affected by intensively developed levels of housing, hard standing, and access roads.

⁷ https://www.gloucestershire.gov.uk/media/2094524/gloucestershire_deprivation_2019_v13.pdf

⁸ <https://magic.defra.gov.uk/MagicMap.aspx>

⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

¹⁰ <https://check-long-term-flood-risk.service.gov.uk/postcode>

There is a nationally protected moat (and see later SA No 9) located within the site and this water body may be interconnected in some way to other water bodies with regard to both quality and quantity such that any new development would need to further investigate the water environment, including potential impacts on archaeological remains – therefore some uncertainty for SA No 4 water quality.

Comments from the Highways since initial SAs of site options (SALA) have identified the need for an improved scheme at the Painswick Rd/Stroud junction in respect of other sites along Winnycroft Lane. Given the size of the proposed development (approx. 140 dwellings) and the potential for cumulative effects, it is considered that there is the potential for minor negative effects against SA Objective 6a (site access/highways) but with uncertainty until detailed transport studies and effectiveness of mitigation measures. The site is not located in close proximity to a designated AQMA. The site is located at the southern edge of the city with limited access to sustainable transport – the nearest bus stop is on Matson Avenue (approximately 800m from the centre of the site to the north) and thus somewhat distant from pedestrian street routes with a likely minor negative effect against SA Objective 6b.

The site is open agricultural land (unknown whether any best and most versatile agricultural land), and any loss of greenfield land is considered to have the potential for a minor negative effect against SA Objective 7 for loss of soils.

The site is greenfield and given the design standards and mitigation provided through the GCT JCS and draft GCP, it is generally considered that there is the potential for a minor positive effect against SA Objective 8 Landscape. However, negative effects are indicated in consideration of the level of development, its relationship with the rural area and taking into account the sensitivity of the historic landscape (see SA No 9 following). The JCS Landscape Sensitivity & Characterisation Assessment (2013)¹¹ identified the South Matson parcel G27 to be of medium sensitivity. The site is located within this G27 parcel of land, and medium landscape sensitivity was reported within the GCP Background Note: Land North of Green Farm (2019)¹². The Gloucester Landscape Analysis of Potential Development Sites (2013)¹³ found that the area of the G27 parcel in which the site is located, is not suitable for development. Therefore, overall, minor negative effects are likely with uncertainty for the effectiveness of any mitigation measures.

The site contains the nationally protected Scheduled Monument of Sneedham's Green Moated site¹⁴ and the effectiveness of visual mitigation on the heritage setting is uncertain. This moated site survives well and is designated¹⁵ since the moat and island will contain remains of medieval structure and archaeological information. 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 – most were supported by the rich farmland around them. That link to the countryside provides a substantial part of the monument's significance. Therefore, it is considered that there is the likelihood for a long-term major negative effect against SA Objective 9 Historic Environment.

¹¹ <https://www.gloucester.gov.uk/media/1110/jcs-landscape-characterisation-assessment-and-sensitivity-analysis-september-2013.pdf>

¹² <https://www.gloucester.gov.uk/media/3789/land-north-of-green-farm-background-note-september-2019.pdf>

¹³ <https://www.gloucester.gov.uk/media/1109/gloucester-landscape-analysis-of-potential-development-sites.pdf>

¹⁴ <https://magic.defra.gov.uk/MagicMap.aspx>

¹⁵ <https://historicengland.org.uk/listing/the-list/list-entry/1019399?section=official-listing>

Currently the surrounding to the moat is waterlogged grassland and the hydrology of the area is balanced. It is possible that this hydrological balance with waterlogged deposits in the moat have enabled preservation of archaeological remains. It is likely that with the level of proposed development and associated hard-standing and urban run-off, there will be some effects on the local hydrology that may result in physical harm to any below ground archaeological remains. Therefore, there is an element of uncertainty for the significance of negative physical effects arising from any changes to hydrology and effects on any archaeological remains in the moat deposits until site level assessments have been completed. However, having considered consultation comments from Historic England¹⁶, the Council considers that mitigation measures would be difficult to resolve the negative impacts on the Scheduled Monument and its setting. Overall, with regard to SA Nos 8 & 9 Landscape & Historic Environment, the Council considers that the site would not be a suitable option for consideration as housing development because the site contains a Scheduled Monument – Sneedhams' Green moated site – of national importance with likely below ground archaeological remains and an important historical setting in a rural area. It is unlikely that Historic England would support any proposed development.

The site is greenfield and unlikely to be any issues for contamination or pollution – neutral effects for SA Objective 11. However, some concern about polluted run-off draining into the moat with possible damage to the archaeological remains, further investigation is required to assess this (and see also previously SA No 4 Water Quality). The site is not proposed for employment use and therefore, neutral effects for SA Objectives 12-13.

The site is not located near to services and facilities including a Local Centre with the potential for a minor negative effect against SA Objective 14. The site is not located within 800m of existing medical facilities with the potential for major negative effects against SA Objective 17. However, the site is at the edge of the urban area with nearby footpaths that could encourage walking in the countryside so some uncertainty at this stage of overall significance and likely to be minor negative effects for health objectives. The site is also not located within 800m of existing educational facilities with the potential for a minor negative effect against SA Objective 24.

The site is located on existing agricultural land with the potential for minor positive effects against SA Objectives 19-20 and nearby access to green and open space. Evidence is unavailable at this stage to effectively assess the effects of development at the site option on cultural heritage (SA Objective 25).

¹⁶ [HIS007/a Background Note: Land North of Green Farm, September 2019] <https://www.gloucester.gov.uk/media/3789/land-north-of-green-farm-background-note-september-2019.pdf>