

Appendix 1: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive¹ (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)². This is Appendix 1 of the Sustainability (Integrated) Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Report (September 2013) –and in accordance with paragraph 165 of the National Planning Policy Framework (2012)³.

The Sustainability (Integrated) Report comprises a Scoping Report (2008), an Initial SA Report (2011), an SA Report (2013) with a Non-Technical Summary (available separately, and including 10 appendices with technical details provided separately; this constitutes the Environmental Report for the purposes of the SEA Directive.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
An outline of the contents, main objectives of the plan and relationship with other relevant plans	Section 1 Introduction	Sets out the vision and main objectives of the Gloucester, Cheltenham & Tewkesbury (GCT) Draft Joint core Strategy (JCS)
	Section 3 Context & Baseline	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2008); and updated in 2013 (Appendix IV).
The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the GCT area. The information is set out in more detail in the SA Scoping Report (2008) which also indicates the likely evolution of current conditions ('trends') where available; and updated

¹ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

² <http://www.parliament.uk/documents/post/postpn223.pdf>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
		in 2013 (Appendix IV).
The environmental characteristics of the area likely to be affected	Section 3 Context & Baseline	Summarised in Section 3 of Main SA Report; where relevant and available this information is detailed in the SA Scoping Report and Appendix IV.
Any existing environmental problems which are relevant to the plan including, in particular, those relation to any areas of a particular environmental importance	Section 3 Context & Baseline	Summarises existing sustainability (including environmental problems) for the GCT area; and updated in 2013(Appendix IV). This section also summarises initial screening information for Natura 2000 sites in line with Habitats Regulations Assessment requirements (HRA Report available separately 2013).
The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 2 SA Methods Section 3 Context & Baseline	Refers to the SA Scoping Report (2008) which provides the summary of objectives for sustainability in the GCT area (including environmental objectives) and the implications of these objectives for the Draft JCS; updated in 2013 (Appendix IV) & objectives for sustainable development still valid and relevant.
The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA objectives. This ensures that all of the issues are considered during the assessment of each element of the Draft JCS since each policy is assessed against each SA objective.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects	Sections 4 to 8 Table 7.4 summary cumulative effects; Tables 8.2-3 Appendices III to XII	- Summarises the likely significant effects of implementing the Draft JCS (including environmental effects) with details provided in the appendices. - Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan	Sections 4 to 8 Appendices III to XII	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are provided in the appraisal matrices (appendices) and summarised in Section 7.
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Sections 4, 6, 7 & 8 Tables 6.3 & 7.2; Section 8	- Alternatives were considered as part of the JCS Developing the Preferred Option (2011) using the SA process against the SA Framework. The reasons for taking forward or not progressing alternatives in 2011 is summarised in Table 6.3. - Options for the development strategy & potential strategic allocations were refined and further appraised through SA in 2013. The reasons for progressing options & not taking others forward is set out in Table 7.2; also described in Section 8
	Sections 2 & 3 Methods & Context, Baseline	Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
A description of the measures envisaged concerning monitoring	Section 9	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the GCT Draft JCS.
A non-technical summary of the information provided under the above headings	Report preface (available separately)	Provides a non-technical summary.

Appendix IV: Baseline & Plans/Programmes Review Updates 2013

Baseline Information

- A) Water & Flooding
- B) Energy & Climate Change
- C) Landscape and Cultural Heritage
- D) Biodiversity, Fauna and Flora
- E) Air Quality
- F) Waste, Minerals & Soil
- G) Communities & Housing
- H) Economy, Employment and Education
- I) Health & Equalities
- J) Transport and Accessibility

A) Water & Flooding

4. Flooding: Manage and reduce flood risk and surface water run-off.

5. Natural Environment and Resources: Protect and improve the quality of natural resources including soil, water and landscape.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Biological and Chemical quality of water bodies	Severn River Basin Management Plan (2009) SEA Final Environmental Report - Severn Trent Water Ltd Water Resources Management Plan (WRMP) June 2010	The RBMP for the Severn reports that in the Severn river basin district 29% of surface waters meet good status or better; 71% do not meet good status (621 water bodies). Of the groundwater bodies present in the river basin district 75% are at good status with the rest being poor status. The JCS area is within the Severn Catchment Abstraction Management Strategy area, which has very good ecological quality throughout reaches. There is risk associated with oxygen levels in Severn Estuary: if freshwater input not sufficient during high tide (due to suspended solids and organic matter) this can lead to depletion in oxygen levels which could lead to fish kills.			The Severn RBMP predicts that by 2015, 17 per cent of surface waters - 152 water bodies - will show an improvement by 2015 for one or more of the elements measured. It also predicts that by 2015, 34 per cent will be in at least good ecological status/potential and 43 per cent of assessed surface waters will be in at least good biological status.	Water quality for surface waters is improving, but only 29 % of water bodies meet 'good' status. Groundwater bodies in the District are in better condition.
Water Resources Number of houses connected	Severn Trent Water Resource Management Plan (2010)	The Severn Trent Water (STW) Water Resource Management Plan (WRMP) identifies six water resource zones (WRZs) within the supply area. The JCS area is contained within the Severn WRZ. The WRMP predicts a net increase of approximately 31Megalitres/day (MI/d) in water consumption from 2006 - 2035 in the Severn WRZ. The supply/demand			Increasing levels of abstraction is putting pressure on water resources.	Similar to other Water Resource Zones in England, water demand in the Severn exceeds supply. High levels of water efficiency should be sought for proposed development where possible.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Number of homes meeting Level 3/4/5 of the Code for Sustainable Homes.		balance for the zone became negative in 2006/2007. The current projected supply/demand shortfall is around 120Ml/d by 2035, taking into account the effects of climate change. This shortfall will arise if no further investment was made to leakage reduction, demand management and resource development. The WRMP outlines investment proposals to maintain the target headroom required to ensure security of supply to customers over the next 25 years. Sustainable and efficient use of available water resources will be required and in the long term there will be a need for more water resources and treatment capacity to meet the supply/demand balance.				
PROPOSED INDICATOR - Developments Incorporating Sustainable Drainage Systems	Development Control Teams/AMR	No data available yet.	No data available yet.	No data available yet.	No data available yet.	No local data available. Sustainable drainage is a concept that includes long term environmental and social factors in decisions about drainage. It takes account of the quantity and quality of runoff, and the amenity value of surface water in the urban environment. Many existing urban drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable.
PROPOSED INDICATOR -	Development Control	No data available yet.	No data available yet.	No data available yet.	No data available yet.	No data available yet.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Development including rainwater harvesting	Teams/AMR					
Number of planning applications approved against EA advice	Environment Agency/AMR	No data available yet.	2006/07 0	2006/07 0	New indicator. No trend data.	New indicator. Applications granted contrary to EA advice can lead to flooding issues either on site or contribute to flooding elsewhere.
Fluvial Flood Risk	Gloucester City Council Strategic Flood Risk Assessment for Local Development Framework Level 1 - Volume 1 - FINAL September 2008	The high degree of urbanisation coupled with the small size of the catchments and impermeable underlying rock mean that the greatest flood risk in the area is from high intensity convective storms more common during the summer season. Flood risk in the Borough is influenced by	The flood risk to Gloucester is predominantly fluvial as the River Severn channel becomes narrower, providing a restriction to high tides moving upstream and river flows moving downstream. However, flooding can be a result of a combination of both tidal	The Rivers Severn and Avon pose the greatest flood risk within the Borough. Where the two watercourses meet at Tewkesbury the topography is flat and the underlying bedrock largely impermeable; as such there is a substantial risk of these rivers coming out of bank and flooding local areas during	Given the lowland setting of the JCS area, an increase in flood extent is expected, but flood waters might also be deeper. This means that the flood hazard is likely to increase over time, creating increased risk to humans, more damage to property and higher economic damages.	Fluvial flood risk is a particular issue for the Joint Core Strategy Area, and the area is known as one of the most vulnerable to flood risk in the UK.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
		surface water and the overloading of the old drainage system, particularly during intense rainfall events.	and fluvial influences. The majority of flood risk in the area appears to arise from the smaller catchments. The main areas at risk are on the Sud Brook around the Tredworth and Linden areas and on the Whaddon Brook around the Podsmead area.	periods of high flows. Smaller catchments within the Borough also pose a flood risk especially in the event of ill-timed localised storms.		
	JCS Level 2 Strategic Flood Risk Assessment October 2011.	A Level 2 Strategic Flood Risk Assessment was commissioned by the Joint Core Strategy authorities in April 2010 and published in October 2011. This provides a more detailed assessment of areas which have been identified as potential development locations and it uses the information from SFRA Level 1 to determine which areas require a further assessment of flood risk. In total, 16 sites potential development sites were identified with the majority in Cheltenham and Tewkesbury.				
Sewer Flood Risk	Gloucester City Council Strategic Flood Risk Assessment for Local Developme	In general the level of flood risk from artificial drainage systems within the Borough is	In general the level of flood risk from artificial drainage systems within the Borough is	In general the level of flood risk from artificial drainage systems within the District is medium to low.	The risk of increased sewer flooding is likely as a result of climate change, which will result in more intensive rainfall events.	Much of the Cheltenham Central Area Main Sewerage System is over 120 years old and thought to be in a poor structural state. A programme of sewer replacement is being implemented and is thought to

Key Indicator	Source	CHEL TENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	nt Framework Level 1 Volume 1 - FINAL September 2008	medium to low. The areas at highest risk are located towards the south west of the Borough by Hatherley, Tivoli and Lansdown; and towards the northern extent of the Borough by St Paul's, Marle Hill, Wymans Brook, Oakley and Lynworth.	medium to high.			involve work beyond the current 5-year Capital Programme. The Chelt main sewer has a large overflow which joins the River Chelt at Arle. It has been recommended by the Environment Agency that any further development within the catchment area of this sewer system deals with surface water appropriately at the surface so that betterment is achieved. An increase in site runoff should not occur as this would increase the sewage flow and would lead to the overflow being used more frequently.
Surface Water Flood Risk	Gloucester City Council Strategic Flood Risk Assessment for Local Development Framework Level 1 Volume 1 - FINAL September	Flooding from surface water is a problem within the Borough, particularly in the town due to abundance of impermeable surfaces. In the past the River Chelt was diverted from its natural course	Surface water flooding in Gloucester tends to be associated with poor urban drainage and backing up within urban drainage systems under high river flows. The	Flooding from surface water is a problem within the Borough, with the largely impermeable geology and gentle topography of the Borough contributing to increased likelihood of	Given the lowland setting of the JCS area, an increase in flood extent is expected, but flood waters might also be deeper. This means that the flood hazard is likely to increase over time, creating increased risk to humans, more damage to property and higher economic	Surface water flooding is also known as a particular problem, and is an issue for all three authorities.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	2008	to higher ground in order to feed the great mills. The original river valley was subsequently developed with housing estates, public buildings and industrial development. Consequently, when intense rainfall events occur, runoff follows natural topography and accumulates at the valley bottom, which can flood areas of the town centre.	abundance of impermeable surface can also contribute to surface water flood risk, especially when local intense rainstorms occur.	surface water flooding. Areas with an abundance of impervious surfaces means these areas are also at risk of surface water flooding, especially when local intense rainstorms occur.	damage.	
Impounded Water Body Flood Risk	Gloucester City Council Strategic Flood Risk Assessment for Local Developme	There are no canals in the Borough. A number of flood storage areas are located within or close	One canal, the Gloucester and Sharpness Canal, is located in Gloucester. There are no	There is one canal in the Borough, The Coombe Hill Canal. There are no recorded	There are no recorded incidents of breaching or overtopping of impended water bodies.	Impounded Water Body Flood Risk is not known to be a particular problem in this area.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	nt Framework Level 1 Volume 1 - FINAL September 2008	to the Borough boundary, namely Dowdeswell Reservoir and Cox's Meadow. Dowdeswell is located outside the eastern extent of the Borough (SO 9884 1973) upstream of Cheltenham and has been modified for use from a water supply reservoir to a flood storage reservoir. There are no records of breaching/ overtopping of reservoirs within, or in the vicinity of, the Borough.	recorded incidents of breaches or overtopping, or any other local flood risk instances associated with this canal. There are no records of breaching/ov ertopping of reservoirs within Gloucester.	incidents of breaching or overtopping, or any other local flood risk instances associated with this canal. There are no records of breaching or overtopping of reservoirs within the Borough.		
Groundwater Flood Risk	Gloucester City Council Strategic Flood Risk Assessment	There are no records of groundwater flooding in the Borough.	There are no records of groundwater flooding in Gloucester.	There are no records of groundwater flooding in the Borough.	There are no records of groundwater flooding in the JCS area.	There are no records of groundwater flooding in the three authority areas.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	for Local Development Framework Level 1 Volume 1 - FINAL September 2008					
Groundwater source protection zones	Environment Agency	1 Zone 1 1 Zone 2 2 Zone 3s	None	5 Zone 1s 4 Zone 2s 1 zone 3	No trend data.	-
Surface Water Drinking Water Protected Areas	Environment Agency	None	1 Surface Water Drinking Water Protected area at risk from colour and pesticides (Metaldehyde, propyzamide)	1 Surface Water Drinking Water Protected Area at risk from pesticides (metaldehyde 2,4 D, CTU, IPU, MCPA, mecoprop, met azachlor)	No trend data.	-
Surface Water Safeguard Zones	Environment Agency	None	None		No trend data.	-
Water Protection Areas	Environment Agency	None	None		No trend data.	-
Groundwater Safeguarded	Environment Agency	1 Groundwater Safeguard Zone	None	1 Groundwater Safeguard Zone	No trend data.	-

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
zones		designated because of nitrate.		designated because of nitrate.		
Groundwater Drinking Water Protected Area	Environment Agency	At least 4: ■ GB40902G9 90900 = Probably Not At Risk ■ GB40902G2 04900 = Probably At Risk ■ GB40901G3 04400 = Probably At Risk ■ B40901G304 500 = At Risk	At least 1: GB40902G2049 00 = Probably At Risk	At least 4: ■ GB40902G9 90900 = Probably Not At Risk ■ GB40902G2 04900 = Probably At Risk ■ GB40901G3 04400 = Probably At Risk ■ B40901G304 500 = At Risk	No trend data.	-

B) Energy & Climate Change

2. Climate Change: Reduce contribution to climate change and support households and businesses in reducing their carbon footprint

3. Climate change: Adapt to the consequences of climate change

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY	
PROPOSED INDICATOR - Developments meeting Code for Sustainable Homes 4 or BREEAM Standard	Development Control Team/AMRs	No data available yet.	No data available yet.	No data available yet.	No data available yet.	New indicator – no data available yet. Achieving Code Level 4 is considered essential in achieving proposed housing figures whilst minimising their environmental impact.	
Local Authority CO2 emissions (tonnes of CO2 per capita)	DECC Local Authority Carbon Dioxide Figures 2010	2005:5.9	2005: 6.1	2005:12.2	Between 2005 and 2009, Co2 emissions per capita reduced in all 3 authorities, reflecting a national decrease in emissions (although the sharp decline 2008-2009 is attributed to the economic recession and consequent decline in industry and transport emissions).	Comparative data:	
		2006:5.9	2006: 6.1	2006:12.5		Gloucestershire total:	England Total:
		2007:5.7	2007: 5.9	2007:12.1		2005: 8.5	2005: 8.8
		2008:5.7	2008: 5.8	2008:11.7		2006: 8.6	2006: 8.7
		2009:4.9	2009: 5.2	2009: 10.7		2007: 8.4	2007: 8.5
		2010: 5.1	2010: 5.4	2010: 10.8		2008: 8.2	2008: 8.2
						2009: 7.5	2009: 7.4
						2010: 7.7	2010: 7.6
						The urban areas of Cheltenham and Gloucester have emission totals well below the national average. However Tewkesbury's is higher, with much of this attributable to higher emissions from industry and road transport.	

CO2 emissions from Domestic consumption (tonnes of CO2 per capita)	DECC (updated 15 Sept 2011) 2009 Local Authority Carbon Dioxide Figures	2005:2.4 2006: 2.4 2007: 2.4 2008: 2.3 2009:2.1	2005:2.3 2006: 2.3 2007: 2.2 2008: 2.2 2009:1.9	2005:2.5 2006: 2.5 2007: 2.4 2008: 2.4 2009:2.1	The trend in Co2 emissions from Domestic consumption is one of decline over the 5 yr period, with the sharpest decline from 2008-2009.	Gloucestershire total:
						England Total:
						2005: 2.6 2006: 2.6 2007: 2.5 2008: 2.5 2009: 2.3 2005: 2.5 2006: 2.5 2007: 2.4 2008: 2.4 2009: 2.1
						Domestic production of CO2 reflects the figure for England as a whole and is lower than the average for Gloucestershire.
SAP rating (average per dwelling). Uses information on appliances and insulation to profile energy efficiency.	Gloucester City Council Private Sector House Condition Survey 2011	GAP	Average SAP rating for a private sector dwelling in Gloucester in June 2011 was 65.	GAP	No trend data available.	The current UK average score is 51, with construction to current building regulations achieving a score of 65.
Installed renewable capacity	Regen South West Renewable Energy Progress Report: South West 2012 Annual	Installed renewable capacity (2012): 1.666 MW	Installed renewable capacity (2012): 12.508 MW	Installed renewable capacity (Jan 2012): 6.130 MW	Installed renewable capacity is increasing across the plan area, reflecting the situation nationally.	In 2012, the UK has a total installed renewable energy capacity of 20.304 MW. This figure is almost quadruple the figure for 2007 (5.174 MW).

	Survey.					
Installed renewable capacity	Regen South West Renewable Energy Progress Report: South West 2012 Annual Survey.	Figure 1 – Installed renewable electricity capacity across the south west (April 2012)⁵ ⁵ Excluding projects of unconfirmed location Figure illustrating renewable energy capacity in Gloucestershire (3rd from right) compared with other South West Authorities. Gloucestershire has 23 MW of installed renewable capacity. (Source: Regen South West Renewable Energy Progress Report: South West 2012 Annual Survey.)				Gloucestershire has less installed renewable energy capacity than other counties within the South West, with Devon and Cornwall having the most. For the South West, renewable energy capacity increased from 217 MW in 2010/11 to 525 MW in 2011/12.

Eco- Footprint	South West Observatory Local Profile 2011	4.86 gha ¹	4.52 gha	4.97 gha	No trend data available.	The Eco footprint of Tewkesbury is higher than the other 2 authorities and 4 th highest in the South West.
Energy Consumption	South West Observatory Local Profile 2011	3,997kWh per consumer in 2009.	4,031 kWh per consumer in 2009.	4,470 kWh per consumer in 2009.	No trend data.	Tewkesbury's energy consumption per consumer is slightly higher than average for region and 8% higher than GB average. Gloucester and Cheltenham are lower than the regional and GB averages.

¹ Ecological footprint is an indicator of total environmental burden placed on the planet. It represents the area of land needed to provide raw materials, energy and food and to absorb pollution and waste created. It is measured in global hectares and is usually expressed as a per person measure. Source (South West Observatory Local Profile)

C) Landscape and Cultural Heritage

5. Natural Resources & Environment: Protect and improve the quality of natural resources including soil, water and landscape.

18. Culture and Tourism: Protect and enhance cultural heritage and promote tourism

7. Historic Environment: Protect and enhance the area's distinctive historic environment.

16. Green space: Create, enhance, protect, connect and improve access to open spaces.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Area of Outstanding Natural Beauty within LA Boundary	Cotswold Conservation Board	1,030ha (22%)	None	14,946ha (31%)	Stable - Last AONB Boundary Review was undertaken in 1990	The AONB is a valuable tourist attraction and it is important that it is managed to benefit local economies without damaging their environmental quality. Cheltenham and Tewkesbury Borough Council's both contribute towards the work of the Cotswolds AONB Conservation Board. The JCS should include policies that support the objectives of the Conservation Board. REGIONAL: 2007 – 890,700 ha NATIONAL: 2007 – 2,043,300 ha
No. of conservation areas	Council websites	7	14	14	No trend data.	Conservation areas are areas of special architectural or historic interest that it is desirable to preserve or enhance. The level of designation of Conservation Areas provides a good indicator of the quality of the built environment in Cheltenham, Gloucester and Tewkesbury

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
						Borough. The Central Conservation Area in Cheltenham is understood to be the largest such area designated in the UK. The JCS should have regard to preserving and enhancing the character of conservation areas and the heritage of the settlements within its area.
Scheduled Monuments	Council websites	6	24	56	No trend data.	There are six scheduled monuments within Cheltenham but many more within Gloucester and Tewkesbury Borough. The JCS should seek to protect and enhance Scheduled Monuments and their setting.
No. of listed buildings	Council websites	2,602	707	1577	No trend data.	The high number of listed buildings in Tewkesbury and Cheltenham reflects the importance of their historic character. Gloucester has relatively fewer listed building, which is likely to be due to the extensive bombing of the city during the second world war and the redevelopment of the City Centre as a result of the Comprehensive Plan for the Central Area of the City of Gloucester in 1961.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
No. of buildings at risk	Buildings at Risk Register, English Heritage	2013 0	2013 7	2013 19	No trend data.	English Heritage maintains the Buildings at Risk Register and it can take some time after remediation work has been completed for buildings to be removed from the list. The number of buildings at risk is not necessarily an indication of the performance of the local authority as many buildings are in private ownership. However, the number of at risk properties can give an indication of the quality of the built environment.
No. of registered parks and gardens	The National Heritage List for England, English Heritage	2013 2	2013 0	2013 7	No trend data.	
No. of registered battlefields	The National Heritage List for England, English Heritage	2013 0	2013 0	2013 1	No trend data.	
National character areas	Gloucestershire Biodiversity Website	Severn and Avon Vales, Cotswolds National Character	Severn and Avon Vales.	Severn and Avon Vales, Cotswolds National Character	No trend data.	

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
		Areas		Areas		
PROPOSED INDICATOR - Landscape Character	Landscape Character Assessment 2013	Landscape Character Type: Settled Un-wooded Vale	Gloucester has the following landscape character types: ■ Settled Un-wooded Vale ■ Floodplain Farmland ■ Vale Hillocks ■ Escarpment Outliers ■ Un-wooded Vale	Tewkesbury has the following landscape character types: ■ Settled Un-wooded Vale ■ Settled Un-wooded Vale (see above) ■ Floodplain Farmland ■ Riverside Meadows ■ Low hills and Commons ■ Principal Village Farmland (Worcestershire) ■ Urban	No trend data.	A Landscape Character Assessment is currently being undertaken for the areas around Tewkesbury, Gloucester and Cheltenham, to be completed late 2012.
PROPOSED INDICATOR - Number of planning	LA AMRs	New Indicator. Not collected in 2006/7				New indicator. No data at present.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
permissions granted contrary to archaeological advice						
No. of parks with Green Flag/Green Pennant	www.greenflagaward.org	2006: 2 2012: 4	2006: 0 2012: 1	2006: 0 2012: 0	Cheltenham and Gloucester have increased the number of parks being awarded Green Flag status.	Green flag status provides an indication of the quality of parks. High quality parks and green spaces are important for local people and can improve the quality of life of local residents.
Area of Green Belt in the Borough within LA Boundary	LA Local Plans	2007 790ha (17%)	None	2007 6,580ha (16%)	Stable – the extent of the greenbelt has not altered in the last 20 years.	The JCS area contains a significant area of green belt designed to prevent urban sprawl and the coalescence of Cheltenham with Gloucester and Bishop's Cleeve. The draft RSS defines areas of green belt as potential locations for future urban extensions and the JCS could be the mechanism for establishing new green belt boundaries.
PROPOSED INDICATOR - Access to Public Open Space	Cheltenham Borough Council Green Space Audit (2008) Gloucester	Of the total of 461 green spaces, 322 (69.8%) have unrestricted access, 135 (29.3%) limited	The city area is 4054ha, of which 518ha is defined as public open space, country park/nature reserve,	GAP	Data gap	Access to green space is linked to increased quality of life for residents.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	Open Space Strategy Draft for Consultation December 2012	access and 4 (0.9%) are not accessible.	allotments or cemeteries. This means that just over 12% of the city's land area is publicly accessible green space.			
Regionally Important Geological Sites	Gloucestershire Geology Trust	GAP	GAP	GAP	No trend data available.	-
Landscape Protection Zones (LPZ)	Tewkesbury Borough Local Plan until 2011	None	None	1 LPZ which covers the majority of the Western half of Tewkesbury Borough (Policy LN03)	No trend data available.	-
Special Landscape Areas (SLAs)	GAP	GAP	GAP	7 SLAs covering mainly part of the Eastern half of the Borough.	No trend data available.	-

D) Biodiversity, Fauna and Flora

1. Biodiversity: Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats.

Key Indicator	Source	CHELtenham	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Number and Area of land designated as a European site (SAC/ SAC/ Ramsar)	JNCC	None	None	Cotswold Beechwoods SAC (585.85) is partially within the Borough. Dixton Wood SAC (13.14)	N/A	SACs and SPAs are internationally important sites designated for their ecological status. Ramsar sites are wetlands of international importance that are also designated for ecological importance.
Number and Area of land designated as SSSI	Natural England - SSSIs	Leckhampton Hill and Charlton Kings Common - 63.7ha	Hucclecote Meadows – 5.71ha Robins Wood Hill Quarry - 1.93ha	There are 18 designated SSSI in Tewkesbury Borough with a total area of 1635ha	SSSI designations are long-term designations and do not change regularly. As designations are rarely revoked, there has been a steady increase in land designated as SSSI across the JCS area.	SSSIs represent the country's very best wildlife and geological sites, including some of our most spectacular and beautiful habitats. It is essential to preserve our remaining natural heritage for future generations. Wildlife and geological features are under pressure from development, pollution, climate change and unsustainable land management. SSSIs are particularly important as they support plants and animals that find it more difficult to survive in the wider countryside.
Number and Area of land	Natural England	Griffiths Avenue (0.76ha)	Alney Island (56.25ha)	None	The number of designated LNRs is	Local Nature Reserves represent an important resource for wildlife

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
designated as Local Nature Reserves			Barnwood Arboretum (1.51ha) Coke's Pit Lake (10.33ha) Coopers Hill (54.44ha) Green Farm Orchard (2.06ha) Hucclecote Meadow (2.69ha) Quedgeley Arboretum (1.55ha) Robinswood Hill Country Park (91.04ha) Saintbridge Balancing Pond (3.36ha)		increasing.	and people so should be protected. There may be development pressure either on or near to LNR given their proximity to existing built up areas. The JCS should seek to protect or enhance LNRs wherever possible.
Habitats: Priority Habitats	Gloucestershire Biodiversity Delivery Plan Cheltenham Borough	■ 52 different habitats recorded, 19 of which were mosaics of at least two habitats	GAP	GAP	Non trend data available	26 priority habitats and 10 local priorities in Gloucestershire. NATIONAL (2007): 65 habitats

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	Council Biodiversity audit (2008)	■ 10 UK Priority HAPs represented ■ 12 UK Broad HAPs represented ■ 12 Gloucestershire HAPs represented ■ Biodiversity Value range from low to high at habitat, local and national levels.				
Priority Species	Gloucestershire Biodiversity Delivery Plan Cheltenham Borough Council	■ 20 European protected species ■ 28 Nationally protected species	GAP	GAP	No trend data available.	223 Priority Species have been identified in Gloucestershire NATIONAL (2007): 1150 species,

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	Biodiversity audit (2008)	■ 7 UK BAP priority species ■ 8 Gloucestershire BAP priority species ■ 23 Other notable species (includes RSPB Red/Amber listed birds and Nationally Scarce, notable and local species).				
Key Wildlife Sites	Gloucestershire Biodiversity Delivery Plan Cheltenham Borough	9	There are 6 key wildlife sites designated by Gloucester Wildlife Trust and 28 other sites of Nature	GAP	GAP	There are over 750 recognised Key Wildlife Sites (KWS) in Gloucestershire. These are part of a nationwide protection system to identify, protect and enhance the most important places for wildlife outside legally protected land. Collectively

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	Council Biodiversity audit (2008) Gloucester local Development Framework SA of the Draft 'Designing Safer Places' Supplementary Planning Document January 2006		Conservation Interest.			these sites form the bulk of the county's wildlife heritage. Local Wildlife Sites cover all the main habitat types in the county and again include sites with single species interest - from glow worms to wild daffodils and bush crickets to the common toad.

E) Air Quality

9. Waste and Pollution: Minimise pollution and waste to landfill.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Air Pollution: Air Quality Management Areas (AQMA)	Defra – AQMA 2013 Air Quality Progress Report for Tewkesbury Borough Council 2012 Air Quality Updating and Screening Assessment for Gloucester City Council	1. Cheltenham AQMA (2011) - Nitrogen dioxide (NO₂) annual mean (Covers the whole of Cheltenham Borough)	1. Barton Street AQMA (2005) - NO₂ 2. Priors Road AQMA (2005) - NO₂ 3. Painswick Road AQMA (2007) - NO₂ The new monitoring data shows that the three AQMAs are still required. The two AQMAs are at opposing ends of the B4703 and there is a significant amount of through traffic.	1. Tewkesbury Town Centre AQMA (2008) - NO₂ The primary pollutant of concern for the Borough is traffic derived and in particular NO₂. Where traffic is constricted and in particular where street canyons are evident, objectives are not being met. The monitoring data shows that Tewkesbury High Street AQMA is still required.	2 AQMAs were designated in 2005 within Gloucester City. Another was then designated in 2007. The AQMA in Tewkesbury designated in 2008, although Tewkesbury previously had 2 AQMAs. Cheltenham's AQMA designated in 2008 but then updated in 2011 to include the whole of the Borough.	AQMAs are generally in locations that represent traffic hotspots in narrow 'corridor' streets where stationary or slow moving traffic occurs.

			No concerns are raised in the other areas monitored. Background Nitrogen Dioxide levels are falling (Source: DEFRA) and it is anticipated that this may be contributing to the fall in NO2 across Gloucester. There was an AQMA in Barnwood until 2010 but the monitoring showed a drop in levels and there was no evidence that this would become a problem again. However, it is a watching brief			

			and any changes in traffic or development activity will be closely scrutinised.			

F) Waste, Minerals & Soil

6. Natural Environment and Resources: Minimise the use of natural resources including soil, water and greenfield land through good design.

9. Waste and Pollution: Minimise pollution and waste to landfill.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
The number and % of minerals and waste developments permitted upon existing sites or Preferred Areas identified within the adopted Minerals and Waste Local Plans	GCC Waste & Minerals AMR 2011 - 2012	Table 3: Minerals developments upon existing sites or preferred areas of the MLP (adopted 2003)				The majority of waste developments (82%) and all minerals minierals during the monitoring period were permitted upon existing sites or preferred areas as identified in the Minerals and Waste Local Plans. The remainder (18%) represented new permissions on land which was not allocated as a preferred area or included an extant waste use.
		Minerals	No. of permitted mineral developments	As a % of all permitted mineral developments (11)		
		Preferred Area	2	18%		
		Existing Site ~	9	82%		
		New Site	0	0%		
		Table 4: Waste developments upon existing sites or preferred areas of the WLP (adopted 2004)				
		Waste	No. of permitted waste developments	As a % of all permitted waste developments (28)		
		Preferred Area	3	11%		
		New Waste Sites*	5	18%		
		Existing Site ~ (This includes existing operations that take place upon preferred areas) #	20	71%		
~Existing sites - includes development proposals that expand or vary the						

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY															
		operations upon existing sites. In some areas these may be small scale operations. * New Sites - new operations or extensions to existing operations that are not preferred areas within the adopted minerals or waste plans. Again in some cases these may be fairly small-scale operations.																			
Annual production of non-aggregate stone	GCC Waste & Minerals AMR 2011 - 2012	<table><tr><th colspan="3">Table 9: Non-aggregate Landbank (excluding clay, but including 'dormant' reserves) As at 31/12/2011</th></tr><tr><th>Mineral Type</th><th>Estimated landbank</th><th>As a % of total non-agg landbank</th></tr><tr><td>Limestone*</td><td>6.34mt</td><td>79%</td></tr><tr><td>Sandstone</td><td>1.73mt</td><td>21%</td></tr><tr><td>TOTAL</td><td>8.07mt</td><td></td></tr></table> * Forest of Dean and Cotswolds limestone figures have been added together to protect confidentiality				Table 9: Non-aggregate Landbank (excluding clay, but including 'dormant' reserves) As at 31/12/2011			Mineral Type	Estimated landbank	As a % of total non-agg landbank	Limestone*	6.34mt	79%	Sandstone	1.73mt	21%	TOTAL	8.07mt		During 2011, 8.07 mt of non-aggregate mineral was supplied from Gloucestershire compared to 5.53mt in 2010. The majority (79%) was made up of limestone.
Table 9: Non-aggregate Landbank (excluding clay, but including 'dormant' reserves) As at 31/12/2011																					
Mineral Type	Estimated landbank	As a % of total non-agg landbank																			
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TOTAL	8.07mt																				

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY															
Annual production of natural building & roofing stone	GCC Waste & Minerals AMR 2011 - 2012	<table><tr><th colspan="3">Table 8: Building & Roofing Stone Production (2011)</th></tr><tr><th>Mineral Type</th><th>Annual Production 2011 (tonnes)</th><th>As a % of total building & roofing stone production</th></tr><tr><td>Limestone*</td><td>38,640</td><td>77%</td></tr><tr><td>Sandstone</td><td>11,266</td><td>23%</td></tr><tr><td>TOTAL</td><td>49,906</td><td></td></tr></table> <i>* Forest of Dean and Cotswolds limestone figures have been added together to protect confidentiality</i>				Table 8: Building & Roofing Stone Production (2011)			Mineral Type	Annual Production 2011 (tonnes)	As a % of total building & roofing stone production	Limestone*	38,640	77%	Sandstone	11,266	23%	TOTAL	49,906		Most of Gloucestershire's natural building and roofing stone (77%) was sourced from limestone. The remainder was made up of sandstone (23%). 2011 supplies showed an increase over the 2009 and 2010 figures. Although the economic recovery is slow nationally this does indicate the relatively strong performance of the sector due to requirements for natural building materials in the refurbishment of historic buildings and infrastructure. It also reflects significant movement at some building stone quarries in cutting shed and the ability to provide a range of natural building products.
Table 8: Building & Roofing Stone Production (2011)																					
Mineral Type	Annual Production 2011 (tonnes)	As a % of total building & roofing stone production																			
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Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY	
The number and % of minerals & waste permissions, which include conditions relating to- • Noise; • Hours of Operations; and • Lighting.	GCC Waste & Minerals AMR 2011 - 2012	Table 12: Conditions relating to amenity				Of the 39 minerals and waste permissions granted during the monitoring period, 33 (85%) contained conditions that related to noise, hours of operation and lighting. The monitoring data suggests that the issue of amenity is a key consideration during the determination of minerals and waste proposals. The majority of the amenity conditions attached to permissions were related to operating hours.	
		Amenity Issue	No. of permissions	As a % of permission including amenity conditions	As a % of total permissions (39)		
		Noise	16	48%	41%		
		Hours	33	100%	85%		
		Lighting	7	21%	18%		
<i>NB. Some permissions contain more than one condition relating to the amenity issues being monitored</i>							
The number of minerals and waste proposals determined upon international, national and local environmental designations.	GCC Waste & Minerals AMR 2011 - 2012	Table 15: Minerals and waste planning proposals on sites with environmental designations					
			AONB	Green Belt	SSSI	KWS	
		Permitted Applications					
		Minerals	6	0	0	0	
		Waste	12	2	0	0	
		Total	18	2	0	0	
		Refused Applications					
		Minerals	0	0	0	0	
		Waste	1	0	0	0	
		Total	1	0	0	0	

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY																								
The number and % of minerals & waste permissions that included one or more of the following highway conditions • Restricted vehicle numbers; • Restricted tonnages; • Restricted routings; and • Highway mitigation measures – <i>the need for wheel washing, lorry sheeting etc.</i>	GCC Waste & Minerals AMR 2011 - 2012	<table><tr><th colspan="4">Table 16: The application of highway conditions (2011 – 2012)</th></tr><tr><th>Type of conditions</th><th>Frequency of use</th><th>As a % of permissions including highway conditions (25)</th><th>As a % of all permissions</th></tr><tr><td>Vehicle numbers</td><td>14</td><td>56%</td><td>36%</td></tr><tr><td>Tonnage</td><td>10</td><td>40%</td><td>26%</td></tr><tr><td>Routing</td><td>10</td><td>40%</td><td>26%</td></tr><tr><td>Mitigation</td><td>24</td><td>96%</td><td>62%</td></tr></table> NB. Some permissions contain more than one highway condition being monitored				Table 16: The application of highway conditions (2011 – 2012)				Type of conditions	Frequency of use	As a % of permissions including highway conditions (25)	As a % of all permissions	Vehicle numbers	14	56%	36%	Tonnage	10	40%	26%	Routing	10	40%	26%	Mitigation	24	96%	62%	Of the 39 minerals and waste permissions granted during the monitoring period, 25 (64%) included highways conditions.
Table 16: The application of highway conditions (2011 – 2012)																														
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Routing	10	40%	26%																											
Mitigation	24	96%	62%																											
Number of Waste Minimisation Statements submitted	GCC Waste & Minerals AMR 2011 - 2012				Cheltenham has a higher percentage of waste minimisation statements produced for major	The JCS should ensure that any planning application for strategic development is accompanied by a waste minimisation statement.																								

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	Total no. of "major development applications"	13	17	22	developments than for the County as a whole. The AMR identifies that there was a fall in the number of waste minimisation statements submitted compared to recent monitoring periods (8% down from last year).	
	No. waste minimisation statements produced	4	4	3		
	As a % of total waste minimisation statements produced	31%	24%	14%		

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Amount of municipal waste arising, and managed by management type and the percentage each management type represents of the waste managed.	GCC Waste & Minerals AMR 2011 - 2012	Table 17: Municipal Solid Waste (MSW) Managed during 2011-2012				During the monitoring period the total amount of MSW managed decreased by 15,358 tonnes compared to the previous monitoring period. This therefore saw a decrease in the amount of waste being sent to landfill. This follows the pattern over an overall 32 decrease in the amount of MSW being managed and sent to landfill over the years. Therefore meeting the 'waste agenda'.
		Waste Management Method		Amount of MSW managed (<i>in tonnes</i>) and % of total MSW		
		Reused		1,263t		
		As % of annual MSW		0.5%		
		Composted		55,100t		
		As % of annual MSW		20%		
		Recycled *(incl. inert & reuse)		68,830t		
		As % of annual MSW		25%		
		Recovery		382t		
		As % of annual MSW		0.1t%		
		Disposed to Landfill		154,630t		
		As % of annual MSW		55%		
		Total		280,205t		
Residual waste (kg/ household), recycling and waste to landfill	SWO Local profiles: Environment 2011	Cheltenham Borough Council had the ninth highest amount of residual waste in the South West with 693.85 kg/household. This was the second highest to be produced in Gloucestershire in 2009/10.	Gloucester City Council had the tenth highest amount of residual waste in the South West with 611.95 kg/household. This was the third highest to be produced in Gloucestershire	In 2009/10, Tewkesbury Borough Council had the eighth highest amount of residual waste in the South West with 614.13 kg/household. This was the highest to be produced in Gloucestershire.	No trend data.	Gloucestershire County Council was not in the top ten highest producers of residual waste produced however were in the top half of the league table in the South West, with 605.00 kg/household. This was the fourth highest to be produced in Gloucestershire. Gloucestershire County Council in 2009/10 against the other South West Councils, was in the top half of the recycling league table with 41.63%. The highest rate of recycling in the SW was
		Cheltenham	Gloucester City Council in 2009/10 had the	Tewkesbury Borough Council		

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY									
		Borough Council in 2009/10 had the tenth lowest amount of recycling in the South West with 32.85%.	seventh lowest amount of recycling in the South West with 32.08%.	in 2009/10 had the sixth lowest amount of recycling in the South West with 31.51%.		Cotswold District Council with 60.4%. Gloucestershire County Council landfilled 178,046 tonnes, which was the third highest amount of tonnes landfilled in the South West. This was also the fourth highest percentage landfilled (60.76%) in the South West.									
Estimated Current MSW Capacity	GCC Waste & Minerals AMR 2010 - 2011	<table><tr><td colspan="2">Table 19: Estimated Current MSW Capacity</td></tr><tr><td colspan="2">Source: Technical Evidence Paper WCS-A Data (Update 2010) Thus the following figures are the most up-to-date at the time of publishing this AMR.</td></tr><tr><td colspan="2">[tpa = tonnes per annum]</td></tr><tr><td>Windrow composting</td><td rowspan="2">Gloucestershire's current capacity for both MSW green waste and food waste composting is around 79,000 tpa</td></tr><tr><td>In-vessel composting</td></tr></table>				Table 19: Estimated Current MSW Capacity		Source: Technical Evidence Paper WCS-A Data (Update 2010) Thus the following figures are the most up-to-date at the time of publishing this AMR.		[tpa = tonnes per annum]		Windrow composting	Gloucestershire's current capacity for both MSW green waste and food waste composting is around 79,000 tpa	In-vessel composting	During the monitoring period 49,000 tonnes of new capacity was granted for waste management sites. During the monitoring period the total amount of MSW managed decreased by 15,358 tonnes compared to the previous monitoring period. This therefore saw a decrease in the amount of waste being sent to landfill. This follows the pattern over an overall 32 decrease in the amount of MSW being managed and sent to landfill over the years. Therefore meeting the 'waste agenda'.
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In-vessel composting															

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
		Household Recycling Centres (HRCs)	Gloucestershire's current HRC handling capacity is currently around 66,000 tpa			
		Residual treatment	0 tpa			
		Transfer	122,000 tpa for General Transfer/Bulking for disposal 35,000 tpa for Transfer/Bulking of Recyclables			
		Landfill	The County Council, under its municipal waste contract with Cory Environmental Ltd, use two landfill sites: Hempsted (Gloucester) and Wingmoor Farm West (Tewkesbury Borough). Currently these sites have a combined remaining voidspace of around 3,205,000 m ³ (at 1/4/2009)			
% new homes built on previously developed land	LA AMRs South West Observatory - The Changing State of the South West 2012 Tewkesbury AMR 2011	150 dwellings (gross) were completed in 2010/11 and 89.3% of these were completed on previously developed land. 124 dwellings (gross) were completed in 2011/12 and	486 new and converted homes completed in 2009/10 and 73.3% of these were on previously developed land. 509 new and converted homes completed in	331 net additional dwellings in 2010/11	Cheltenham has seen a slight decrease while Gloucester has seen an increase in homes being developed on previously developed land.	In 2010, the proportion of dwellings built on previously developed land (excluding conversions) was 60% in the South West compared to 73% in England.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
		87.2% of these were completed on previously developed land.	2010/11 and 85.1% of these were on previously developed land.			
Contaminated Land	Contaminated Land Register	There is one area of contaminated land on the register - Marle Hill Landfill (12ha) which has been remediated.	There are 8 areas of contaminated land identified on the register.	None.	No trend data.	Contaminated land can be brought back into use and ensure that contamination is removed so there is no harm to the environment or human health.
Agricultural Land Classification	DEFRA Magic Map Post 1988 Agricultural Land Classification (England) (% of total LPA area)	Grade 2 ≈ 0.5% Grade 3a ≈ 0.5% Grade 3b ≈ 1%	Grade 3b ≈ 0.5% Grade 4 ≈ 0.5%	Grade 1 ≈ 0.5% Grade 2 ≈ 0.5% Grade 3a ≈ 2% Grade 3b ≈ 4%	No trend data.	Agricultural Land Classifications were devised by sight using maps provide by Magic Map (DEFRA, 2013). Cheltenham and Gloucester are predominantly urban LPAs where as Tewkesbury is predominantly rural and is approximately 5 times the size of both Cheltenham and Gloucester put together.

G) Communities & Housing

12. Sustainable Communities: Reduce inequalities in wellbeing and opportunity

13. Sustainable Communities: Reduce crime and the fear of crime

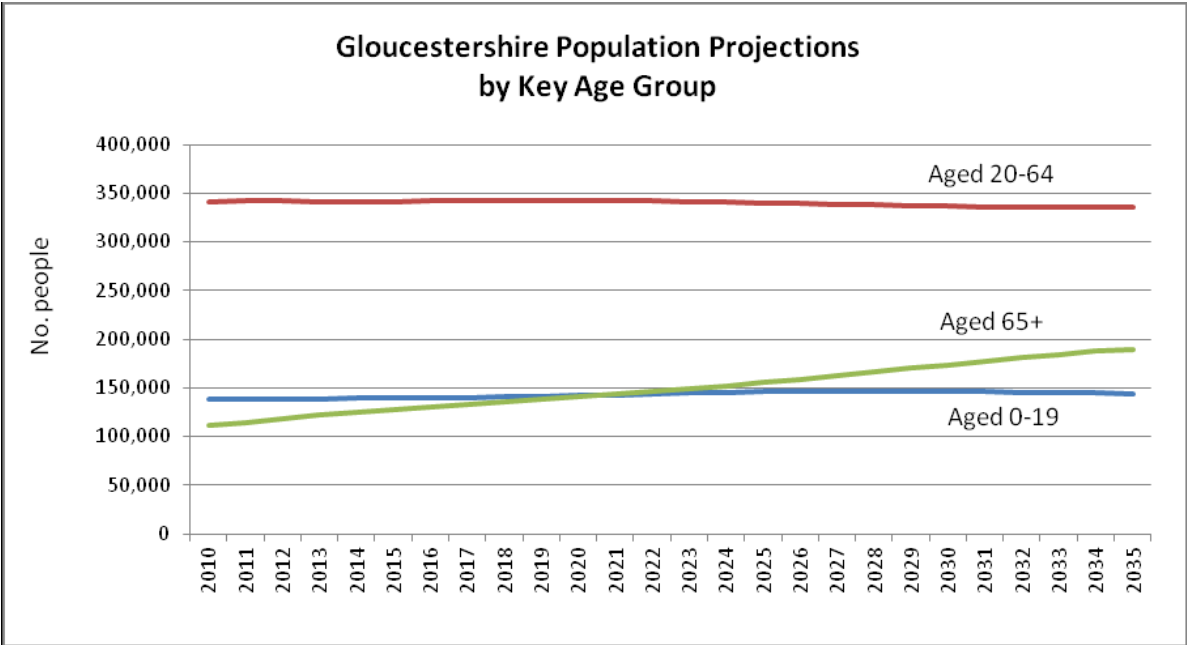
15. Housing: Ensure everyone has access to a decent home that they can afford and meets their needs.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Total Population	ONS – 2011 Census data & Gloucestershire Population Monitor	115,700 Increase of 5.2 % since 2001	121,700 Increase of 10.8 % since 2001	81,900 Increase of 7.2 % since 2001	Populations of all three individual authorities have been gradually increasing over a number of years.	In 2011, the total Gloucestershire population was: 596,900- an increase of 5.7 % since 2001. Gloucester is the fastest growing LGA in Gloucestershire.
Sub-national Population Projections	ONS – 2011 Sub-national Population Projections	2021 124,196 increase of 7%	2021 135,271 increase of 11%	2021 91,909 increase of 12%	Population is predicted to continue increasing.	Gloucester and Tewkesbury are predicted to experience a greater percentage increase in population up to 2021 than the predicted national percentage increase of 8.5%. It's predicted that the population will continue to increase with an 11% increase in Gloucester, a 7% increase in Cheltenham and a 12% increase in Tewkesbury by 2021 ² . The total population of the GCT area is expected to grow by 18.6% based on ONS 2011 projections and Cambridge

² Sub-national population projections (ONS 2011)

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
						Centre for Housing and Planning Research analysis) between 2011 and 2031 ³ .
Birth trends	Gloucestershire Population Monitor July 2012	Since 2005, the birth trend in Gloucestershire has been one of increase. Fertility rates in Gloucester were well above the England and Wales average in 2010 (73.8 compared to 65.4 live births per 1,000 women aged 15-44).				With births and natural growth at their highest for 20 years, the JCS will need to ensure planning accounts for this population increase and subsequent need for schools and childcare facilities.
Mortality trends	Gloucestershire Population Monitor July 2012	The mortality trend has been a downward one, with Stroud and Gloucester recording the largest number of deaths in Gloucestershire. Gloucester was the only district in the county where the mortality rate was above the England and Wales average (568.1 vs 541.8 deaths per 100,000 population).				With births and natural growth at their highest for 20 years, the JCS will need to ensure planning accounts for this population increase and subsequent need for schools and childcare facilities.
Population: 0-19 years	ONS – 2011 Census data & Gloucestershire Population Monitor	22.5%	25.1%	22.1%	The proportion of the total population under 15 years of age has been gradually decreasing over a number of years in all three local authorities.	In 2011, the total Gloucestershire population aged 0-19 years was 136,500, a decrease of 0.7 per cent since 2001.

³ Cambridge Centre for Housing and Planning Research (May 2013) The new Household Projections and their implications for the Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council areas

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Population: Aged 65+	ONS – 2011 Census data & Gloucestershire Population Monitor	16.8 %	14.9%	20.1 %	The number of people over 65 years of age has been gradually increasing over the last few years in all three local authorities.	In 2011, the total Gloucestershire population aged 65+ was 111,300, and increase of 13.6 % since 2001.
Future population projections for Gloucestershire	Gloucestershire Population Projections by Key Age Group  Source: Strategic Needs Analysis Team, Strategy & Challenge : Understanding Gloucestershire 2012. Version 1.0, last updated 06/July/2012.					The number of older people aged 65+ in the county has been growing by an average of 1,500 people per year over the last 10 years or so. Projections suggest that this will double to an annual increase of around 3,000 people on average in the short and medium term, increasing to 3,300 people in the longer term, as rising life expectancy and demographic impacts of two generations of baby boomers take hold.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Income Rank Of 354 Local Authorities where 1 is most deprived	ONS	2007 187	2007 142	2007 305	No trend data.	
Housing Benefit claims/recipients	DWP Statistics: Housing Benefit Recipients (000's households, and percentage of housing stock)	Households claiming Housing Benefit: August 2007: 6.1 (12.5%) June 2011: 7250 recipients May 2012: 7410 recipients	Households claiming Housing Benefit: August 2007: 7.1 (15.5%) June 2011: 9320 recipients May 2012: 9690 recipients	Households claiming Housing Benefit: August 2007: 3.1 (9.6%) June 2011: 4060 recipients May 2012: 4190 recipients	Rising gradually across the JCS area.	The percentage of claimants is consistently higher than that of Gloucestershire (11.9%). The number of housing benefit recipients has increased in all 3 authorities between 2011-2012.
Fuel Poverty Households in fuel poverty (count/percentage) – full income – basic income	Centre for Sustainable Energy (CSE), Fuel Poverty Indicators 2008	 2829 (5.9%) 3193 (6.7%)	 2879 (6.3%) 3197 (7.0%)	 1864 (5.8%) 1924 (6.0%)	The highest percentage of households suffering from fuel poverty is located in Gloucester, followed by Cheltenham and Tewkesbury.	Approximately 6 per cent of the JCS households were classed as being in fuel poverty 2008, however this is expected to have doubled in recent years (DATA GAP). Fuel poverty within the JCS area:

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
						7572 (6.0%) 8314 (6.6%)
Benefits Claimants: Disability	Nomis (DWP Benefit Claimants) (2012)	560 people (0.7 % of residents btw 16-64)	910 people (1.1 % of residents btw 16-64)	490 people (0.9 % of residents btw 16-64)	No trend data.	Gloucester has a notably higher number of residents claiming Disability Living Allowance than Cheltenham and Tewkesbury.
Job Seekers Allowance	Nomis	May 2013: 2195 (2.9 % of residents btw 16-64)	May 2013: 3220 (4.1 % of residents btw 16-64)	May 2013: 135 (2.0 % of residents btw 16-64)	The number of people claiming Job-Seekers Allowance had been gradually decreasing since 2006, but has increased since.	Gloucester has the highest number of residents claiming Job Seekers Allowance, followed by Cheltenham and then Tewkesbury. This compares to 3.6 per cent of residents btw 16-64 in Great Britain.
Residents that feel fairly safe or very safe outside in daylight (%)	Gloucestershire County Council Research Team	2008: 92.5%	2008: 89.3%	2008: 94.6%	The percentage of residents that feel fairly safe or very safe outside during daylight have increased in both Cheltenham and Gloucester. Tewkesbury has decreased very	Gloucester consistently has the lowest figures of those that feel fairly safe/very safe. This is a reflection of its predominantly urban nature but could also point to increased antisocial behaviours in comparison with the two boroughs.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
					slightly.	
Residents that feel fairly safe or very safe outside after dark (%)	Gloucestershire County Council Research Team	2008: 44.0%	2008: 38.5%	2008: 52.4%	The percentage of residents that feel safe or fairly safe outside after dark have increased in both Cheltenham and Gloucester. In Tewkesbury the percentage has decreased.	Gloucester consistently has the lowest figures of those that feel fairly safe/very safe outside after dark. This is a reflection of its predominantly urban nature but could also point to increased antisocial behaviours in comparison with the two boroughs.
Robbery	Home Office Statistics	2003: 125 2012:50	2003: 310 2012: 143	2003: 21 2012: 12	Incidences of robbery have decreased between 2003 and 2012	Crime rates in England and Wales had been falling for 16 years, however there is evidence that crime levels have remained flat or started to rise in recent surveys (British Crime Survey).
Household Burglary	Home Office Statistics	2003: 872 2012:583	2003: 1024 2012: 672	2003: 323 2012: 240	Incidences of burglary have decreased between 2003 and 2012 .	
Violence against the person (with injury)	Home Office Statistics	2003: 734 2012: 690	2003: 935 2012: 947	2003: 225 2012: 187	Incidences of violent crime have increased in Gloucester, reduced in the other 2 areas.	
Drug Offences	Home Office Statistics	2003: 286	2003: 369	2003: 57	The rate of drug offences	This reflects the national statistics.

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy
Sustainability (Integrated) Appraisal Report: Appendix IV: Baseline & Plans/Programmes Review Updates 2013 & 2014

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
		2012:427	2012: 520	2012: 128	throughout the JCS area increased between 2003 and 2012	
Housing Stock	Housing Improvement Programme (HIP) Report (April 2008). ONS (2011)	2008: 52,228 2011: 53,122	2008: 51,355 2011: 52,722	2008: 35,432 2011: 37,057	Cheltenham has the largest housing stock, followed by Gloucester and then Tewkesbury.	The total for Gloucestershire is around 266944 dwellings. Cheltenham houses the largest number of dwellings in Gloucestershire (19.9 %), followed by Gloucester (19.7%).
New dwelling construction	Housing Trend Analysis & Population Household Projections May 2011. Gloucestershire County and Districts Planning Authorities	1992-2009/2010: 7,258 new dwellings	1992-2009/2010: 10,881 new dwellings	1992-2009/2010: 7,534 new dwellings	Housing completions have fallen dramatically recent years, since the onset of the economic recession.	Over the 10 year period Gloucester has the highest build rate of the three local authorities.
Total net new housing completions	Local Authority Housing Monitoring Reports South West Observatory - The Changing State of the South West 2012	2007/08: 576 2006/07: 1012 2010/11: 150 dwellings (gross) were completed	2007/08: 1021 2006/07: 962 2010/11: 486 new and converted homes	2007/08: 684 2006/07: 502 2010/11: 331net additional dwellings	Housing completions have fallen dramatically recent years, since the onset of the economic recession.	Totals for JCS are: 2007/08: 2,281 2006/07: 2,476 2010/11: 967 Gloucester has the highest annual housing build rates of the three local authorities.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Household size	ONS, Census 2011. (Total occupied households in authority)	1 person: 17,735 (34.8%) 2 person: 17,716 (34.8%) 3 person: 6,822 (13.4%) 4 person: 5,921 (11.6%) 5 person: 1,942 (3.8%) 6 person: 570 (1.1%) 7 person: 140 (0.3%) 8 person +: 83 (0.2%)	1 person: 14,695 (29.2%) 2 person: 17,072 (33.9%) 3 person: 8,183 (16.2%) 4 person: 6,971 (13.8%) 5 person: 2,409 (4.8%) 6 person: 758 (1.5%) 7 person: 178 (0.4%) 8 person +: 97 (0.2%)	1 person: 9,858 (28.0%) 2 person: 13,628 (39.0%) 3 person: 5,135 (14.6%) 4 person: 4,602 (13.1%) 5 person: 1417 (4.0%) 6 person: 396 (1.1%) 7 person: 63 (0.2%) 8 person +: 27 (0.1%)	No trend data available.	Household sizes are very similar between all three local authorities. Results show however that Cheltenham and Gloucester have significantly higher proportions of 1-person households that Tewkesbury. Tewkesbury however has significantly higher 2-person households. Gloucester tends to have higher proportions of larger households. Household sizes within the JCS area are similar to those in the South West as a whole.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Forecast Household Growth	Gloucestershire Housing Affordability Model Introduction and Baseline Results Summary Report Oct 2011	Table 1: Forecast household growth percentages for each district of Gloucestershire 2008 – 2031				
Number of houses without central heating	ONS - 2011 Census	1519 (3.0%)	1648 (3.3%)	945 (2.7%)	No trend available.	The percentage of people living in the Cheltenham and Gloucester without central heating as at the 2011 Census is slightly higher than the national average for England and Wales at 2.7%.
Social Rented Housing	ONS - 2011 Census	3,882	3,884	1,702	No trend data available.	Gloucester has the highest number of affordable/social rented properties, followed by Cheltenham and then Tewkesbury.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Average house price to average income ratio	District Stories in Gloucestershire (Data from 2005)	2005: 8.8	2005: 7.5	2005: 7.8	Generally rising across the JCS area but with a slight decrease in Tewkesbury in 2005.	House prices have been rising dramatically and have been accompanied by a low rise of annual income. This has created issues of affordability with first-time buyers.
Average House Prices	Source: Land Registry of England and Wales	Average Cost: £245,172 Detached: £411,200 Semi-detached: £231,694 Terraced: £218,061 Flat: £171,358	Average Cost: £151,746 Detached: £219,945 Semi-detached: £155,648 Terraced: £123,877 Flat: £96,068	Average Cost: £212,441 Detached: £292,538 Semi-detached: £189,377 Terraced: £163,424 Flat: £105,202	House price changes across all types in the last year (2011 -2012) Cheltenham: +4.4% Gloucester: -2.0% Tewkesbury: -0.4%	Cheltenham has the highest house prices across all types, followed by Tewkesbury and Gloucester. There is a significant disparity between Gloucester and the other two authorities. Average house prices in Gloucestershire decreased by 2.5 % from 2011/12, to £224,551.
Affordable homes built	Housing Improvement Programme (HIP) Report (2008) Cheltenham, Gloucester and Tewkesbury AMRs	2007/08: 101 2010/11: 23 (15 social rented housing and 8 intermediate housing.)	2007/08: 241 2010/11: 210 (Social rent homes = 133 and intermediate homes = 77)	2007/08: 247 2010/11: 69 (Social rent homes provided: 48 Shared ownership homes provided: 12)	According to the data there has been a significant decrease in the number of affordable homes constructed in all 3 areas.	The highest number of affordable homes was built in Gloucester, corresponding to a higher need in this area. The current level of provision of affordable housing is insufficient to address long-term shortages in affordable housing.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
				HomeBuy Direct homes provided: 9)		
Vacant dwellings	DCLG Live tables on dwelling stock 2012	1652	1759	761	The numbers for Cheltenham and Tewkesbury have decreased since 2004 where as the numbers for Gloucester have increased.	As of 2012, there were 4172 vacant dwellings in the JCS area which approximately equates to 2.9 % which is equal to the average found in Gloucestershire as a whole and just under the National average. These dwellings are all potentially habitable and encouragement should be made to bring them back into use to minimise building on greenfield land.
Number of second homes on council tax register	Local Authority Council Tax Registers (2008) (Number of dwellings in local authority area that are furnished and subject to a 10% discount on rates)	750	158	273	No trend data available.	Cheltenham has significantly higher numbers of second homes than Tewkesbury and Gloucester. At the time of writing (August 2008) there are 1181 dwellings in the JCS are that are second homes. Second home ownership increases the pressure on accommodation and can push up prices for local residents. (Please note that this is calculated in the basis that the

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
						property is fully furnished and not the owner primary residence. It may also include therefore rented and furnished properties that are currently vacant.
Gypsy and traveller caravan Accommodation (baseline)	Gypsy and traveller caravan count: January 2013 (DCLG)	3 sites offering 75 pitches: - Cursey Lane Caravan Site, Cursey Lane, Elmstone Hardwicke, Cheltenham, GL51 (19 pitches) - Showborough Caravan Site, Twynning, Tewkesbury, Gloucestershire, GL20 6DN (10 pitches) - Willows Caravan Site, Sandhurst Lane, Gloucester, GL2 9NB (46 pitches)			No trend available.	GCT have commissioned a Gypsy, Traveller and Travelling Showpeople Assessment to be done in 2013. This will identify additional pitches needed to meet current and future needs.
Gloucestershire County Gypsy, Traveller and Travelling Showpeople Accommodation Assessment	Gloucester County (October 2013)	Gypsy and Traveller extra pitches required to 2031 = 2 Travelling show people extra plot provision to 2031 = 0	Gypsy and Traveller extra pitches required to 2031 = 2 Travelling show people extra plot provision to 2031 = 14	Gypsy and Traveller extra pitches required to 2031 = 147 Travelling show people extra plot provision to 2031 = 22	-	Greatest number of travelling show people plots and gypsy and traveler pitches are needed between 2013 and 2017 in Tewkesbury.

H) Economy, Employment and Education

10. The Economy: Ensure the availability of employment land and premises to encourage inward investment and support the creation of new jobs and growth of existing businesses.

11. City and Town Centres: Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations

17. Education and skills: Improve access to education and life-long learning and enhance skills.

18. Culture and Tourism: Protect and enhance cultural heritage and promote tourism

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Percentage of working population that is economically active	NOMIS and Assessment of Cheltenham, Gloucester and Tewkesbury Employment Land Reviews March 2011 NLP and Partners	2007 86.2% 2012 79.0 %	2007 83.9% 2012 83.3 %	2007 89.2% 2012 82.0 %	The percentage of working population that is economically active has significantly decreased since 2007 for all 3 local authority areas.	The percentage of working population that is economically active is above national and regional average for all 3 local authority areas. REGIONAL: 78.4 NATIONAL: 76.9
Percentage of economically active population that are unemployed	NOMIS	2007 4.7% 2012 7.0%	2007 4.6% 2012 7.3%	2007 3.2% 2012 5.1%	This figure has increased substantially since 2007 for all 3 authorities. Tewkesbury has the lowest rate of unemployment.	The unemployment rates are below the national average for all 3 local authority areas, Tewkesbury's figure is also below the regional average. REGIONAL: 6.0% NATIONAL: 7.9%
Job Seekers Allowance	NOMIS	2008 2.1	2008 2.4 May 2013:	2008 1.4 May 2013:135	The number of people claiming Job-Seekers Allowance had been gradually	Gloucester has the highest number of residents claiming Job Seekers Allowance, followed by Cheltenham and then Tewkesbury.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
		May 2013: 2195 (2.9 % of residents btw 16-64)	3220 (4.1 % of residents btw 16-64)	(2.0 % of residents btw 16-64)	decreasing since 2006, but has increased since.	This compares to 3.6 per cent of residents btw 16-64 in Great Britain.
Percentage of workforce in services industry	NOMIS	2008 84.6%	2008 85.5%	2008 66.8%	No trend data.	Cheltenham and Gloucester are above the regional and national averages, Tewkesbury's figures are lower, reflecting a more rural economy. REGIONAL: 82.5% NATIONAL: 83.5%
Percentage of workforce in manufacturing	NOMIS	2006 12.5% 2008 12.0 %	2006 8.4% 2008 8.5%	2006 26.5% 2008 25.3	The figure for Cheltenham and Tewkesbury decreased from 2006-2008 and Gloucester's increased slightly. Note: these figures are pre-recession and it is likely that a decline has been experienced since then.	The percentage employed in manufacturing is much higher for Tewkesbury Borough this could be due, in part, to the good transport links provided by the M5 which runs through the Borough. REGIONAL: 10.7% NATIONAL: 10.2%
Percentage of workforce in tourism related industries	NOMIS	2006 7.6% 2008	2006 5.1% 2008	2006 7.5% 2008	Long term trend is stable for Cheltenham and Gloucester and reducing for	The percentage employed in tourism related industries is below the national and regional averages for all 3 local authority areas and notably lower for

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Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
		7.9%	5.6%	6.7%	Tewkesbury.	Gloucester. REGIONAL: 9.0% NATIONAL: 8.2%
VAT registration	NOMIS	2006: 415 2007: 440	2006: 285 2007: 300	2006: 250 2007: 265	All 3 authorities experienced an increase in 2006-2007, of between 8.2 (Tewkesbury) and 10.6 (Gloucester) percent.	The South West experienced an 8.9 percent increase 2006-2007. Nationally the increase was 10.2 per cent.
VAT de-registration	NOMIS	2006: 296 2007: 310	2006: 205 2007: 230	2006:205 2007:185	All 3 Authorities have also had an increase in business registrations from 2006-2007	REGIONAL: 12,095 NATIONAL: 139,205
Total Employee Jobs, Full-time & Part-time	NOMIS	53,500 33,600 F/T 19,900 P/T	62,000 38,500 F/T 23,500 P/T	35,900 26,400 F/T 9,500 P/T	No trend data.	Gloucester has the highest number of jobs of the 3 Authorities.
Earnings : Gross weekly pay- full time workers	NOMIS	2007: £487 2012: £538.9	2007: £407 2012:£502.1	2007: £466 2012:£499.8	Earnings per week have increase between 2007 and 2012.	Earnings are higher than the regional average for all three authorities and higher than the national average for Tewkesbury & Cheltenham. REGIONAL: £464.50 NATIONAL: £502.60
Job density (ratio of jobs to population aged	NOMIS	2005: 0.93 2011: 0.94	2005: 1.00 2011: 0.83	2005: 0.87 2011: 0.87	The job density has declined, especially in Gloucester,	The ratio of jobs to population for all three areas is well above the national average. While a

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
16-64)					coinciding with the economic recession.	positive trend that shows the vitality of Cheltenham and Gloucester's economy this can also lead to inflexibility within the labour market. REGIONAL: 0.82 NATIONAL: 0.78
Employment by occupation : Managerial and professional occupations	NOMIS 2012	45.3 %	39.8	50.5	No trend data.	All three authorities are above average for Managerial and professional jobs, with Tewkesbury well above average. REGIONAL: 43.1 NATIONAL: 44.0
Skills: NVQ4 or higher	NOMIS	2007: 44.3% 2012: 45.2%	2007: 18.4% 2012: 30.3 %	2007: 40.4% 2012: 38.7 %	In Cheltenham and Gloucester this figure has increased since 2007 while in Tewkesbury the figure has declined	Cheltenham and Tewkesbury are well above regional and national averages for those with NVQ4 or higher levels of education while Gloucester is below these averages, but has improved significantly. REGIONAL: 34.1% NATIONAL: 34.4%
Working-age key benefit claimants (Total benefit claimants)	NOMIS	2012: 10.5%	2012: 14.3 %	2012: 9.1 %	No trend data.	Gloucester has an above average (both regionally and nationally) percentage of working age people receiving benefits. Tewkesbury and Cheltenham are below average. REGIONAL: 12.0% NATIONAL: 14.1%

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Education: 16-74 No Qualifications	NOMIS	2007: 6.0% 2012: 6.4%	2007: 12.1% 2012: 7.3%	2007: 9.1% 2012: #	This figure has fallen for Gloucester, but increased for Cheltenham	The percentage of the population with no qualifications is below the national average for all 3 local authority areas. REGIONAL: 7.0% NATIONAL: 9.7%
Business stock	NOMIS	2006 4040	2006 2645	2006 3095	Cheltenham, Gloucester and Tewkesbury have all experienced an increase in business stock since 2004.	All three local authority areas have experienced an increase in the number of businesses. REGIONAL: 183,420 NATIONAL: 1,892,385
Business Stock per 1,000 population	NOMIS/ONS	2006 36	2006 23	2006 39	No trend data.	Cheltenham and Tewkesbury have significantly higher numbers of businesses per 1,000 population than Gloucester. This could indicate that Gloucester has fewer businesses but that those businesses employ more people. Alternatively, it could indicate a higher degree of entrepreneurialship in Tewkesbury and Cheltenham.
No. new business starts supported by Economic Development	TEN Corporate ED9	2007 52	N/A	N/A	No trend data.	Figures vary every year. Drop during 2006/07 because of staff resources.
Employment land (B use class) required over the plan period	Assessment of Cheltenham, Gloucester and Tewkesbury	23.2 ha	34.6 ha	23.6 ha	No trend data.	The provision of future employment land will need to be addressed through the Joint Core Strategy.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
	Employment Land Review 2011					
Percentage of population of working age	NOMIS	2006: 62.4% 2010: 65.0 %	2006: 62.1% 2010: 64.9 %	2006: 59.5% 2010: 61.9%	No trend data.	Cheltenham and Gloucester have an above average ratio of people of working age to population while Tewkesbury is below average. REGIONAL: 62.8 NATIONAL: 64.8
Containment rate	Census 2001	2001 70%	2001 66%	2001 48%	No trend data.	High containment rates in Cheltenham and Gloucester should be maintained, lower rate in Tewkesbury reflects the rural nature of the Borough.
15 year-olds achieving 5+ GCSE's at grades A* to C	ONS, GCSE and Equivalent Results for Young People	2005/06: 60.5%	2005/06: 62.7%	2005/06: 64.2%	Rising steadily.	The highest achievement rates in 2005/06 were in Tewkesbury, followed by Gloucester and Cheltenham.
Total estimated tourism spend (£)	Gloucestershire Tourism	2003 148,429,000	2001 109,200,000	Data gap	No trend data	These figures demonstrate the importance of tourism to Cheltenham and Gloucester. Tewkesbury's data is combined with Cotswold District and could not be separated therefore a data gap exists for Tewkesbury
Retail rank – of all centres in UK	MHE	2006 23rd	2006 89th	2006 Tewkesbury town centre 565th	No trend data.	Cheltenham has consistently been ranked higher in the national retail hierarchy than its population would suggest. There is a clear retail hierarchy and this

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
				Bishops Cleeve 1268th		will need to be addressed in the Joint Core Strategy.
Retail floor space	Gloucester Retail Study	2007 141,355sq.m	2007 116,761sq.m	Data gap	No trend data.	Both retail studies (for Cheltenham and Gloucester) have identified a need for an increase in retail floor space. A large retail development is currently under construction at Gloucester Docks.

I) Health & Equalities

12. Sustainable Communities: Reduce inequalities in wellbeing and opportunity

14. Health: Improve access to health facilities and promote healthy lifestyles

19: Proposed additional Equalities objective: Encourage and support different groups, including the young, elderly, disabled and ethnic minorities to contribute to developing a diverse and strong community

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Health in Cheltenham	Gloucestershire Public Health Intelligence Unit - Cheltenham Health Profile 2012	Cheltenham The chart below shows how the health of people in Cheltenham compared with the rest of England. This area's result for each indicator is shown as a circle. The average rate for England is shown by the black line, which is always at the centre of the chart. The range of results for all local areas in England is shown as a grey bar. A red circle means that this area is significantly worse than England for that indicator; however, a green circle may still indicate an important public health problem.				The health of people in Cheltenham is generally better than the England average. Deprivation is lower than average, however about 3,500 children live in poverty. Life expectancy for both men and women is higher than the England average. Life expectancy is 8.8 years lower for men and 5.5 years lower for women in the most deprived areas of Cheltenham than in the least deprived areas. Over the last 10 years, all cause mortality rates have fallen. The early death rate from heart disease and stroke has fallen and is better than the England average. About 14.7% of Year 6 children are classified as obese, lower

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Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY																																																																																																																																																																																																																																														
		● Significantly worse than England average ● Not significantly different from England average ● Significantly better than England average England Worst England Average England Best 25th Percentile 75th Percentile <table><tr><th>Domain</th><th>Indicator</th><th>Local No. Per Year</th><th>Local Value</th><th>Eng Avg</th><th>Eng Worst</th><th>England Range</th><th>Eng Best</th></tr><tr><td rowspan="6">Our communities</td><td>1 Deprivation</td><td>11697</td><td>10.4</td><td>19.8</td><td>83.0</td><td></td><td>0.0</td></tr><tr><td>2 Proportion of children in poverty ‡</td><td>3545</td><td>19.1</td><td>21.9</td><td>50.9</td><td></td><td>6.4</td></tr><tr><td>3 Statutory homelessness ‡</td><td>23</td><td>0.5</td><td>2.0</td><td>10.4</td><td></td><td>0.0</td></tr><tr><td>4 GCSE achieved (5A*-C inc. Eng & Maths)</td><td>575</td><td>64.8</td><td>58.4</td><td>40.1</td><td></td><td>79.9</td></tr><tr><td>5 Violent crime</td><td>1451</td><td>12.7</td><td>14.8</td><td>35.1</td><td></td><td>4.5</td></tr><tr><td>6 Long term unemployment</td><td>174</td><td>2.3</td><td>5.7</td><td>18.8</td><td></td><td>0.9</td></tr><tr><td rowspan="5">Children's and young people's health</td><td>7 Smoking in pregnancy ‡</td><td>199</td><td>14.9</td><td>13.7</td><td>32.7</td><td></td><td>3.1</td></tr><tr><td>8 Breast feeding initiation ‡</td><td>1013</td><td>75.8</td><td>74.5</td><td>39.0</td><td></td><td>94.7</td></tr><tr><td>9 Obese Children (Year 6) ‡</td><td>141</td><td>14.7</td><td>19.0</td><td>26.5</td><td></td><td>9.8</td></tr><tr><td>10 Alcohol-specific hospital stays (under 18)</td><td>20</td><td>85.9</td><td>61.8</td><td>154.9</td><td></td><td>12.5</td></tr><tr><td>11 Teenage pregnancy (under 18) ‡</td><td>51</td><td>19.7</td><td>38.1</td><td>64.9</td><td></td><td>11.1</td></tr><tr><td rowspan="5">Adults' health and lifestyle</td><td>12 Adults smoking ‡</td><td>n/a</td><td>17.0</td><td>20.7</td><td>33.5</td><td></td><td>8.9</td></tr><tr><td>13 Increasing and higher risk drinking</td><td>n/a</td><td>24.2</td><td>22.3</td><td>25.1</td><td></td><td>15.7</td></tr><tr><td>14 Healthy eating adults</td><td>n/a</td><td>32.0</td><td>28.7</td><td>19.3</td><td></td><td>47.8</td></tr><tr><td>15 Physically active adults ‡</td><td>n/a</td><td>15.8</td><td>11.2</td><td>5.7</td><td></td><td>18.2</td></tr><tr><td>16 Obese adults ‡</td><td>n/a</td><td>20.7</td><td>24.2</td><td>30.7</td><td></td><td>13.9</td></tr><tr><td rowspan="8">Disease and poor health</td><td>17 Incidence of malignant melanoma</td><td>14</td><td>13.4</td><td>13.6</td><td>26.8</td><td></td><td>2.7</td></tr><tr><td>18 Hospital stays for self-harm ‡</td><td>281</td><td>245.4</td><td>212.0</td><td>509.8</td><td></td><td>49.6</td></tr><tr><td>19 Hospital stays for alcohol related harm ‡</td><td>2612</td><td>1903</td><td>1895</td><td>3276</td><td></td><td>910</td></tr><tr><td>20 Drug misuse</td><td>703</td><td>9.3</td><td>8.9</td><td>30.2</td><td></td><td>1.3</td></tr><tr><td>21 People diagnosed with diabetes ‡</td><td>5251</td><td>4.9</td><td>5.5</td><td>8.1</td><td></td><td>3.3</td></tr><tr><td>22 New cases of tuberculosis</td><td>9</td><td>7.9</td><td>15.3</td><td>124.4</td><td></td><td>0.0</td></tr><tr><td>23 Acute sexually transmitted infections</td><td>875</td><td>759</td><td>775</td><td>2276</td><td></td><td>152</td></tr><tr><td>24 Hip fracture in 65s and over ‡</td><td>126</td><td>406</td><td>452</td><td>655</td><td></td><td>324</td></tr><tr><td rowspan="8">Life expectancy and causes of death</td><td>25 Excess winter deaths ‡</td><td>66</td><td>21.1</td><td>18.7</td><td>35.0</td><td></td><td>4.4</td></tr><tr><td>26 Life expectancy – male</td><td>n/a</td><td>80.6</td><td>78.6</td><td>73.6</td><td></td><td>85.1</td></tr><tr><td>27 Life expectancy – female</td><td>n/a</td><td>84.4</td><td>82.6</td><td>79.1</td><td></td><td>89.8</td></tr><tr><td>28 Infant deaths ‡</td><td>3</td><td>2.4</td><td>4.6</td><td>9.3</td><td></td><td>1.2</td></tr><tr><td>29 Smoking related deaths</td><td>153</td><td>167</td><td>211</td><td>372</td><td></td><td>125</td></tr><tr><td>30 Early deaths: heart disease and stroke ‡</td><td>57</td><td>48.6</td><td>67.3</td><td>123.2</td><td></td><td>35.5</td></tr><tr><td>31 Early deaths: cancer ‡</td><td>121</td><td>102.2</td><td>110.1</td><td>159.1</td><td></td><td>77.9</td></tr><tr><td>32 Road injuries and deaths ‡</td><td>27</td><td>23.7</td><td>44.3</td><td>128.8</td><td></td><td>14.1</td></tr></table> ‡ Substantially similar to indicator proposed in the Public Health Outcomes Framework published January 2012				Domain	Indicator	Local No. Per Year	Local Value	Eng Avg	Eng Worst	England Range	Eng Best	Our communities	1 Deprivation	11697	10.4	19.8	83.0		0.0	2 Proportion of children in poverty ‡	3545	19.1	21.9	50.9		6.4	3 Statutory homelessness ‡	23	0.5	2.0	10.4		0.0	4 GCSE achieved (5A*-C inc. Eng & Maths)	575	64.8	58.4	40.1		79.9	5 Violent crime	1451	12.7	14.8	35.1		4.5	6 Long term unemployment	174	2.3	5.7	18.8		0.9	Children's and young people's health	7 Smoking in pregnancy ‡	199	14.9	13.7	32.7		3.1	8 Breast feeding initiation ‡	1013	75.8	74.5	39.0		94.7	9 Obese Children (Year 6) ‡	141	14.7	19.0	26.5		9.8	10 Alcohol-specific hospital stays (under 18)	20	85.9	61.8	154.9		12.5	11 Teenage pregnancy (under 18) ‡	51	19.7	38.1	64.9		11.1	Adults' health and lifestyle	12 Adults smoking ‡	n/a	17.0	20.7	33.5		8.9	13 Increasing and higher risk drinking	n/a	24.2	22.3	25.1		15.7	14 Healthy eating adults	n/a	32.0	28.7	19.3		47.8	15 Physically active adults ‡	n/a	15.8	11.2	5.7		18.2	16 Obese adults ‡	n/a	20.7	24.2	30.7		13.9	Disease and poor health	17 Incidence of malignant melanoma	14	13.4	13.6	26.8		2.7	18 Hospital stays for self-harm ‡	281	245.4	212.0	509.8		49.6	19 Hospital stays for alcohol related harm ‡	2612	1903	1895	3276		910	20 Drug misuse	703	9.3	8.9	30.2		1.3	21 People diagnosed with diabetes ‡	5251	4.9	5.5	8.1		3.3	22 New cases of tuberculosis	9	7.9	15.3	124.4		0.0	23 Acute sexually transmitted infections	875	759	775	2276		152	24 Hip fracture in 65s and over ‡	126	406	452	655		324	Life expectancy and causes of death	25 Excess winter deaths ‡	66	21.1	18.7	35.0		4.4	26 Life expectancy – male	n/a	80.6	78.6	73.6		85.1	27 Life expectancy – female	n/a	84.4	82.6	79.1		89.8	28 Infant deaths ‡	3	2.4	4.6	9.3		1.2	29 Smoking related deaths	153	167	211	372		125	30 Early deaths: heart disease and stroke ‡	57	48.6	67.3	123.2		35.5	31 Early deaths: cancer ‡	121	102.2	110.1	159.1		77.9	32 Road injuries and deaths ‡	27	23.7	44.3	128.8		14.1	than the average for England. The level of is worse than the England average. Levels of teenage alcohol-specific hospital stays among those under 18 pregnancy and GCSE attainment are better than the England average.	Estimated levels of adult physical activity and obesity are better than the England average. Rates of road injuries and deaths and smoking related deaths are better than the England average. The rate of hospital stays for self-harm is higher than average.
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Health in Gloucester	Gloucestershire Public Health Intelligence Unit - Gloucester Health Profile 2012		Gloucester The chart below shows how the health of people in Gloucester compared with the rest of England. This area's result for each indicator is shown as a circle. The average rate for England is shown by the black line, which is always at the centre of the chart. The range of results for all local areas in England is shown as a grey bar. A red circle means that this area is significantly worse than England for that indicator; however, a green circle may still indicate an important public health problem.			The health of people in Gloucester is mixed compared with the England average. Deprivation is higher than average and about 5,100 children live in poverty. Life expectancy for both men and women is similar to the England average. Life expectancy is 11.4 years lower for men and 9.2 years lower for women in the most deprived areas of Gloucester than in the least deprived areas. Over the last 10 years, all cause mortality rates have fallen. The early death rate from heart disease and stroke has fallen and is similar to the England average. About 23.3% of Year 6 children are classified as obese, higher than the average for England. The level of GCSE attainment is better than the England average. The estimated level of adult obesity is worse than the England average. Rates of

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy
Sustainability (Integrated) Appraisal Report: Appendix IV: Baseline & Plans/Programmes Review Updates 2013 & 2014

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		● Significantly worse than England average ● Not significantly different from England average ● Significantly better than England average England Worst England Average England Best 25th Percentile 75th Percentile <table><tr><th>Domain</th><th>Indicator</th><th>Local No. Per Year</th><th>Local Value</th><th>Eng Avg</th><th>Eng Worst</th><th>England Range</th><th>Eng Best</th></tr><tr><td rowspan="6">Our communities</td><td>1 Deprivation</td><td>29294</td><td>25.2</td><td>19.8</td><td>83.0</td><td> </td><td>0.0</td></tr><tr><td>2 Proportion of children in poverty ‡</td><td>5135</td><td>21.4</td><td>21.9</td><td>50.9</td><td> </td><td>6.4</td></tr><tr><td>3 Statutory homelessness ‡</td><td>109</td><td>2.2</td><td>2.0</td><td>10.4</td><td> </td><td>0.0</td></tr><tr><td>4 GCSE achieved (5A*-C inc. 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Eng & Maths)	956	65.8	58.4	40.1		79.9	5 Violent crime	2077	17.7	14.8	35.1		4.5	6 Long term unemployment	289	3.8	5.7	18.8		0.9	Children's and young people's health	7 Smoking in pregnancy ‡	257	14.9	13.7	32.7		3.1	8 Breast feeding initiation ‡	1308	75.8	74.5	39.0		94.7	9 Obese Children (Year 6) ‡	290	23.3	19.0	26.5		9.8	10 Alcohol-specific hospital stays (under 18)	14	54.3	61.8	154.9		12.5	11 Teenage pregnancy (under 18) ‡	91	41.1	38.1	64.9		11.1	Adults' health and lifestyle	12 Adults smoking ‡	n/a	18.3	20.7	33.5		8.9	13 Increasing and higher risk drinking	n/a	22.1	22.3	25.1		15.7	14 Healthy eating adults	n/a	27.1	28.7	19.3		47.8	15 Physically active adults ‡	n/a	11.5	11.2	5.7		18.2	16 Obese adults ‡	n/a	27.9	24.2	30.7		13.9	Disease and poor health	17 Incidence of malignant melanoma	22	19.8	13.6	26.8		2.7	18 Hospital stays for self-harm ‡	378	326.1	212.0	509.8		49.6	19 Hospital stays for alcohol related harm ‡	2724	2043	1895	3276		910	20 Drug misuse	1008	13.0	8.9	30.2		1.3	21 People diagnosed with diabetes ‡	7189	6.6	5.5	8.1		3.3	22 New cases of tuberculosis	9	7.7	15.3	124.4		0.0	23 Acute sexually transmitted infections	1134	957	775	2276		152	24 Hip fracture in 65s and over ‡	118	476	452	655		324	Life expectancy and causes of death	25 Excess winter deaths ‡	72	23.3	18.7	35.0		4.4	26 Life expectancy – male	n/a	78.0	78.6	73.6		85.1	27 Life expectancy – female	n/a	82.4	82.6	79.1		89.8	28 Infant deaths ‡	9	5.0	4.6	9.3		1.2	29 Smoking related deaths	179	216	211	372		125	30 Early deaths: heart disease and stroke ‡	78	65.0	67.3	123.2		35.5	31 Early deaths: cancer ‡	143	121.4	110.1	159.1		77.9	32 Road injuries and deaths ‡	31	26.1	44.3	128.8		14.1	sexually transmitted infections and hospital stays for alcohol related harm are worse than the England average. The rate of road injuries and deaths is better than the England average.	The rates of violent crime, incidence of malignant melanoma, hospital stays for self-harm and drug misuse are higher than average. The rate of long term unemployment is lower than average.
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Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Health in Tewkesbury	Gloucestershire Public Health Intelligence Unit - Tewkesbury Health Profile 2012	Tewkesbury The chart below shows how the health of people in Tewkesbury compared with the rest of England. This area's result for each indicator is shown as a circle. The average rate for England is shown by the black line, which is always at the centre of the chart. The range of results for all local areas in England is shown as a grey bar. A red circle means that this area is significantly worse than England for that indicator; however, a green circle may still indicate an important public health problem.				The health of people in Tewkesbury is mixed compared with the England average. Deprivation is lower than average, however about 2,000 children live in poverty. Life expectancy for both men and women is higher than the England average. Life expectancy is 7.2 years lower for men and 5.7 years lower for women in the most deprived areas of Tewkesbury than in the least deprived areas. Over the last 10 years, all cause mortality rates have fallen. The early death rate from heart disease and stroke has fallen and is better than the England average. About 15.9% of Year 6 children are classified as obese, lower than the average for England. The level of teenage pregnancy is better than the England average. The estimated level of adult

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy
Sustainability (Integrated) Appraisal Report: Appendix IV: Baseline & Plans/Programmes Review Updates 2013 & 2014

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY														
		● Significantly worse than England average ● Not significantly different from England average ● Significantly better than England average England Worst England Average England Best 25th Percentile 75th Percentile <table><tr><th>Domain</th><th>Indicator</th><th>Local No. Per Year</th><th>Local Value</th><th>Eng Avg</th><th>Eng Worst</th><th>England Range</th><th>Eng Best</th></tr><tr><td rowspan="6">Our communities</td><td>1 Deprivation</td><td>1343</td><td>1.7</td><td>19.8</td><td>83.0</td><td> < </td></tr></table>				Domain	Indicator	Local No. Per Year	Local Value	Eng Avg	Eng Worst	England Range	Eng Best	Our communities	1 Deprivation	1343	1.7	19.8	83.0	<
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Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
No of LSOAs (lower super output Areas) in most deprived 10 percent	South West Observatory Indices of Deprivation 2010- Gloucestershire Summary.	3 (+1 since 2007)	5 (same as 2007)	0 (no change from 2007)	The number of statistical areas in the most deprived 10 percent in England has remained relatively stable, with 1 additional area declared in Cheltenham.	This data demonstrates the inequalities that exist both within and between the urban areas of Gloucester and Cheltenham. Cheltenham (13) and Gloucester (14) have a high number of LSOAs in the 10 and 20 per cent domain for crime, an increase from 2007. The other most prevalent forms of deprivation in Gloucester and Cheltenham are living environment (poor housing conditions), education, income and employment. Tewkesbury features on the most deprived 10 percent domain for barriers to housing and services.
No of LSOAs (lower super output Areas) in most deprived 20 percent	South West Observatory Indices of Deprivation 2010- Gloucestershire Summary.	8 (-1 since 2007)	18 (no change from 2007)	1 (no change from 2007)	The number of statistical areas in the most deprived 20 percent in England has remained relatively stable, with 1 LSOA in Cheltenham moving to the 10 per cent category.	In the 20 percent domain, health and barriers to housing are an additional feature for Gloucester. Since 2007, Gloucester has seen a major increase in the number of LSOAs within the top 20 % most deprived for housing barriers.

Ethnicity	South West Observatories Local Profile 2012	In 2001, the County of Gloucestershire had the 4 th largest population of ethnic minorities in the South West of England. Over half lived in Gloucester. Gloucester had the 2 nd largest proportion of ethnic minorities in the South West, with 1.9 per cent mixed ethnicity, 2.8 Asian or Asian British, 2.3 Black or Black British and 0.5 Chinese or other.																													
Ethnicity:	Gloucestershire Equality Profile 2013 (Gloucestershire County Council, 2013)	<table><tr><td></td><td>White (%)</td><td>Black or Ethnic Minority (%)</td></tr><tr><td>Cheltenham</td><td>94.3</td><td>5.7</td></tr><tr><td>Cotswold</td><td>97.8</td><td>2.2</td></tr><tr><td>Forest of Dean</td><td>98.5</td><td>1.5</td></tr><tr><td>Gloucester</td><td>89.1</td><td>10.9</td></tr><tr><td>Stroud</td><td>97.9</td><td>2.1</td></tr><tr><td>Tewkesbury</td><td>97.5</td><td>2.5</td></tr><tr><td>Gloucestershire</td><td>95.4</td><td>4.6</td></tr><tr><td>England</td><td>85.4</td><td>14.6</td></tr></table>		White (%)	Black or Ethnic Minority (%)	Cheltenham	94.3	5.7	Cotswold	97.8	2.2	Forest of Dean	98.5	1.5	Gloucester	89.1	10.9	Stroud	97.9	2.1	Tewkesbury	97.5	2.5	Gloucestershire	95.4	4.6	England	85.4	14.6		The majority of Gloucester's, Cheltenham's and Tewkesbury's population is white. Black or Ethnic Minorities make up a very small percentage of their populations, which is considerable lower than the reported for England as a whole. Gloucester has the highest proportion of people from a Black or Ethnic Minority compared to the other Councils. The proportion of people that are classified as Other White is higher in Cheltenham than England as a whole. The proportion of people that are classified a Caribbean and White and Black Caribbean is higher in Gloucester than England.
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Percentage of Population with Long Tem Limiting Illness or Disability	Gloucestershire Equality Profile 2013 (Gloucestershire County Council, 2013)					Gloucester, Cheltenham and Tewkesbury all have a lower percentage of their populations with long term limiting illness or disability than the national average.
			With a long term limiting illness or disability (%)	No Long Term Limiting Illness or Disability (%)		
		Cheltenham	15.1	84.9		
		Cotswold	16.1	83.9		
		Forest of Dean	19.6	80.4		
		Gloucester	16.8	83.2		
		Stroud	16.7	83.3		
		Tewkesbury	16.5	83.5		
		Gloucestershire	16.7	83.3		
England	17.6	82.4				
Population: 0-19 years	ONS – 2011 Census data & Gloucestershire Population Monitor	22.5%	25.1%	22.1%	The proportion of the total population under 15 years of age has been gradually decreasing over a number of years in all three local authorities.	In 2011, the total Gloucestershire population aged 0-19 years was 136,500, a decrease of 0.7 per cent since 2001.
Population: Aged 65+	ONS – 2011 Census data & Gloucestershire Population Monitor	16.8 %	14.9%	20.1 %	The number of people over 65 years of age has been gradually increasing over the last few years in all three local authorities.	In 2011, the total Gloucestershire population aged 65+ was 111,300, and increase of 13.6 % since 2001.

J) Transport and Accessibility

8. Sustainable Transport: Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car.

Key indicator	Source	CHELTHENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
Travel to work data (ONS)	Commute by car (driving):	54.6 %	60.2 %	64.4 %	No trend data available.	Gloucester and Tewkesbury have significantly higher levels of commuting by private car. South West average 58.7 % South West 12.1 %/UK 10%
	Walk to work:	16.7%	10.5 %	7.7 %		
	Bicycle:	6.89 %	6.06%	5.01 %		
	Public transport:	5.5 %	7.02%	4.88 %		
Vehicle kilometres travelled	South West Observatory – Local Profiles	6,312 mill vehicle km travelled in Gloucestershire County			Between 1993 and 2009, kilometers travelled increased by 33 % in Gloucestershire	The number of vehicle kilometers travelled in the South West increased by 26 % between 1993 and 2009.
Estimated traffic flow for all vehicle types (million vehicle km)	ACDP 2005 2004 2003	6015 5941 5844	6015 5941 5844	6015 5941 5844	No trend data.	

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
% residents that think that in their local area over the past three years, public transport has got better or stayed the same	ACDP 2003/04	61.76%	68.09%	78.01%	No trend data.	Gloucestershire: 68.0%
% residents that think that in their local area over the past three years, the level of traffic congestion has got better or stayed the same	ACDP 2003/04	20.72%	25.61%	30.75%	No trend data.	Gloucestershire: 28.77%
Car Ownership: No Car or van	ONS 2011 Census	2001 23.0% 2011 22%	2001 24.0% 2011 22.6%	2001 15.0% 2011 13.6%	All have followed national trends in that there has been a reduction in the number of people who do not have a car or van. REGIONAL: 2001 – 20.21% NATIONAL: 2001 – 26.84% REGIONAL: 2011 – 18.9%	Low figure for Tewkesbury reflects rural nature of district and the challenge of improving public transport provision.

Key Indicator	Source	CHELTENHAM	GLOUCESTER	TEWKESBURY	TREND	COMMENTARY
					NATIONAL: 2011 – 25.8%	
2+ Cars/ vans	ONS 2011 Census	2001 30.0% 2011 25.5%	2001 30.0% 2011 26.9%	2001 40.0% 2011 33.5%	The has been a decrease in the number of people who own 2 cars between 2001 and 2011. This reduction follows the national trend.	All above national average. High Tewkesbury total reflects the rural nature of the district. REGIONAL: 2001 – 33.62% NATIONAL; 2001 – 29.47% REGIONAL: 2011 – 28.3% NATIONAL: 2011 – 24.7%
Air travel	Gloucestershire Airport Website	Gloucestershire Airport handled 16,238 passengers in 2010, the smallest airport in the South West.			Passenger numbers decreased by almost 20% when compared to 2009.	Air Passenger numbers: REGIONAL: decline 1.9% NATIONAL: increase 3.4 %
Road casualties	DfT Road Casualties Great Britain	2010: 258 casualties per 100,000 people in Gloucestershire. 12.2 % of casualties resulted in death or serious injury.			None.	Road casualties are lower than the regional and national averages. REGIONAL: 310 NATIONAL: 355
Access to Services	MAIDeN Accessibility Toolkit 2012	Accessibility by bus and car is considered to be better in Cheltenham and Gloucester than in Tewkesbury. This is because Tewkesbury is a large rural Local Authority whereas Cheltenham and Gloucester are more urban and therefore the higher number of people make public transport more viable.			None.	The MAIDeN Accessibility Toolkit 2012 calculates journey times to key services in Gloucestershire.

Plans and Programmes Review

- A) Sustainable Development & Planning
- B) Water & Flooding
- C) Energy & Climate change
- D) Landscape and Cultural heritage
- E) Biodiversity, Fauna and Flora
- F) Air Quality
- G) Waste, Minerals & Soil
- H) Communities & Housing
- I) Economy, Employment and Education
- J) Health & Equalities
- K) Transport and Accessibility

A) Sustainable Development & Planning

International

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
Johannesburg Declaration on Sustainable Development 2002	The Johannesburg Declaration highlights present challenges, expresses a commitment to sustainable development, underscores the importance of multilateralism and emphasizes the need for implementation.	• Halve the proportion of people without access to drinking water and basic sanitation by 2015 • Develop a ten-year framework of sustainable consumption and production programmes	The JCS should produce sustainable patterns of development. The SA process seeks to ensure that adverse sustainability effects are minimised and opportunities for sustainable development are maximised.
Rio Declaration on Environment and Development 1992	People have a right to development however they have a responsibility to safeguard the common environment. The Rio declaration states that the only way to have long-term economic progress is to link it with environmental protection.	• Precautionary approach to the environment • Environmental protection integral to development process • Develop national law regarding liability for the victims of pollution and other environmental damage. • Environmental policies should not be used as an unjustifiable means of restricting international trade. • Local communities have a vital role in environmental management and development and their participation should be encouraged in the achievement of sustainable development	The JCS needs to promote environmental protection as an integral part of future development. Local communities must be meaningfully involved in the production of the JCS and especially in environmental protection policies within it. Local communities must have access to all environmental evidence considered in the production of the JCS and be able to make a meaningful contribution to its SA.
Strategic Environmental Assessment (SEA) Directive (2001/42/EC)	European directive which requires an assessment to be made of the effect of certain plans and programmes on the environment. Key issues include biodiversity, health, soil, water, air quality, landscape, cultural heritage, climate, flora and fauna.	All Plans, Policies and Programmes that will have a significant effect on the environment must be subject to SEA.	The JCS will be subject to SEA. The SA process will be designed to incorporate SEA and fully comply with the directive.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Agenda 21 2002	To achieve a sustainable balance between consumption, population and the Earth's life-supporting capacity.	• Adopt national strategies for sustainable development. • To carry out environmental assessments before starting projects that carry the risk of adverse impacts	The JCS needs to have sustainable development at its core. Assessments will be required if there are likely to be adverse effects on the environment.
The Aarhus Convention 1998 EU Directive on public access to environmental information (2003/4/EC) 2003	The convention encourages effective public participation to increase the accountability and transparency of decision-making, also contributing to public awareness of environmental issues and support for the decisions taken.	• Authorities must take decisions which may have a significant effect on the environment as well as on personal health and wellbeing. • In taking decisions authorities must ensure effective public participation. • Participation by associations, organisations, groups, in particular nongovernmental organisations promoting environmental protection should be encourage to increase public awareness of environmental decisions and to support the decisions taken.	The JCS and SA must be subject to rigorous consultation and the public must be able to make a meaningful and informed input to the process. All information relied upon by the SA and the JCS will be made publicly available. Consultation on both the JCS and the SA will be held throughout the process.
European Spatial Development Perspective 1999	To define at Union level policy objectives and general principles of spatial development to ensure the sustainable development of the European territory which respects its diversity.	• Establish a polycentric and balanced urban system • Promote integrated transport and communications concepts. • Develop and conserve natural and cultural heritage • Implement cross border planning strategies, land-use plans, improved regional transport systems, sustainable development strategies in rural areas and programmes making use of the natural and cultural heritage.	The JCS should be mindful of cross-border and cross boundary planning strategies. The JCS should establish the inter-relationships of towns within the JCS area and consider their functional relationships with other centres.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Environment 2010: Our Future, Our Choice (EU Sixth Environment Action Programme)	The latest Environment Action Programme (EAP) gives a strategic direction to the Commission's environmental policy over the next decade, as the Community prepares to expand its boundaries. The new programme identifies four environmental areas to be tackled for improvements: ■ Climate Change; ■ Nature and Biodiversity; ■ Environment and Health and Quality of Life; and ■ Natural Resources and Waste.	Recognises that land use planning and management decisions in the Member States can have a major influence on the environment, leading to fragmentation of the countryside and pressures in urban areas and the coast. Also includes objectives on stabilising greenhouse gases, halting biodiversity loss, reducing pollution and resource use. Under the EAP framework, Thematic Strategies are being developed on: ■ Air quality; ■ Soil Protection; ■ Sustainable use of Pesticides; ■ Waste Prevention and Recycling; ■ Sustainable Use of Natural Resources; and ■ Urban Environment.	The JCS should consider implementing policies which help bring about improvements for Climate Change; Nature and Biodiversity; Environment and Health and Quality of Life; and Natural Resources and Waste. The SA framework has objectives relating to: Climate change; Health; Natural environment and resources; Waste and pollution; and Biodiversity.
A Sustainable Europe for a Better World: A European Union Strategy for Sustainable Development (2001); Communication from the Commission to the Council and the European Parliament on the review of the Sustainable Development Strategy - A platform for action 2005 (Review 2009)	The document sets the challenge to maintain a momentum that mutually reinforces economic growth, social welfare and environment protection.	The Review highlights a number of key issues which need a strong push at the highest political level to engage the public, speed up decision-making and action at all levels, encourage more 'joined up' thinking and accelerate the uptake of new and better ideas. These are: ■ Climate change and clean energy ■ Public health ■ Social exclusion, demography and migration ■ Management of natural resources ■ Sustainable transport ■ Global poverty and development challenges	The JCS should consider the key issues highlighted in the document in the development of planning policies. The SA framework has objectives relating to: Climate change; Health; Natural environment and resources; Sustainable communities.
National			
National Planning Policy Framework (NPPF) (2012)	The national planning policy framework aims to reform the planning system to	Local Plans should set out strategic priorities to deliver:	The National Planning Policy Framework must be taken into

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	make it less complex and more accessible, and to promote sustainable growth. The NPPF streamlines existing Planning Policy Statements, Planning Policy Guidance Notes and circulars to form a single consolidated document which promotes sustainable development. It provides a framework within which local people and authorities can produce local and neighbourhood plans.	- Housing and economic development requirements. - The provision of retail, leisure and other commercial development. - The provision of infrastructure for transport, minerals, waste, energy, telecoms, water supply and water quality. - The provision of health, security, community infrastructure and other local facilities; and - Climate change mitigation and adaptation, protection and enhancement of the natural and historic environment, including landscape, and where relevant coastal management.	account in the preparation of the JCS. The JCS will draw on the policy framework within the NPPF and ensure that new strategies and policies reflect the guidance within this framework. The SA will identify objectives which reflect the policies and subject areas within the NPPF.
Rural White Paper (Our Countryside: The Future – A Fair Deal for Rural England) 2000	Sets out the Government's vision for rural areas. The White Paper's aim is to sustain and enhance the countryside.	A living countryside • A working countryside • A protected countryside A vibrant countryside	The JCS and SA Framework should reflect the vision and objectives of the White Paper and encourage rural sustainability. The SA Framework includes decision aiding questions relating to rural sustainability under wider topic objectives relating to urban and rural areas.
Urban White Paper (Our Towns and Cities, The Future: Delivering an Urban Renaissance) 1999	Sets out the Governments vision for towns, cities and suburbs which offer a high quality of life and opportunity for all.	• People shaping the future of their community. • Strong and representative local democracy. • People living in attractive, well kept towns and cities which use space and buildings well. • Promoting environmental sustainability through good design and planning which makes urban living practical and pleasant. • Towns and cities that create and share prosperity. • Good quality services that meet the needs	The JCS and SA Framework should reflect the vision and objectives of the White Paper and encourage sustainability in urban areas. The SA Framework includes decision aiding questions relating to urban sustainability under wider topic objectives relating to urban and rural areas.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		of people and businesses wherever they are.	
Natural Environment White Paper: The Natural Choice: securing the value of nature (2011)	The White Paper intends to rethink our relationship with nature and the way we value the benefits we get from it. The white paper will focus on climate change, the green economy and demographic change.	The white paper will mainstream the value of nature across our society by: - facilitating greater local action to protect and improve nature; - creating a green economy, in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature; - strengthening the connections between people and nature to the benefit of both; and - showing leadership in the EU and internationally to protect and enhance natural assets globally.	The JCS will ensure that policies and new developments will consider the natural environment and economic growth. The objectives of the SA also reflect the requirements of the white paper.
Securing the Future: Delivering UK Sustainable Development Strategy, 2005	This document replaces 'A Better Quality of Life: A Strategy for Sustainable Development in the UK', published in 1999. It is a strategy for sustainable development, building on the 1999 publication.	• Encouraging Sustainable Consumption and Production • Contributing to Reducing Climate Change and Energy Consumption • Natural Resource Protection and Environmental Enhancement • Developing Sustainable Communities	Sustainable development should be at the heart of the JCS. The SA Framework includes objectives that cover the full range of objectives within the Sustainable Development Strategy.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Regional/sub-regional			
The Countryside Agency (Now Natural England)– The State of the Countryside in the South West 2003	Presents information on the state of the countryside in the South West – highlighting the key issues for the rural areas within the Region and contrasting performance with that in the other English Regions. Details the condition of SSSI in 2003.	No specific objectives but highlights the relatively poor state of SSSI in the JCS area and the need for 90% SSSI to be in either Good or Improving condition.	The JCS will need to define a strategy for dealing with rural areas and should consider the condition of designated sites. The SA Framework will include an objective on the condition of designated sites and the need to achieve national targets.
The Gloucestershire Strategic Infrastructure Delivery Plan (SIDP) (2010)	SIDP is a strategic infrastructure delivery plan, process and programme. Its purpose is to co-ordinate and integrate the delivery of infrastructure required to serve new and existing development in Gloucestershire in the future; and in so doing, to provide a sound evidence base to underpin the Local Development Frameworks (LDFs) of the District Councils. SIDP will provide a more robust evidence base than has formerly been available for negotiating developer contributions, other emerging funding opportunities to support new development (e.g. Tax Incremental Financing) and will be critical for advising on local tariffs or community infrastructure levies should the County and/or individual District Councils choose to apply them.		The SA Framework includes objectives which are relevant to the IDP including: Economy; Health; City and Town Centres; Transport; and Sustainable Communities.
'Our Environment Our Future' Regional Strategy for the South West Environment, 2004-2014	Provides the vision and aims for the environment of the south west in the future. It identifies pressures threatening the environment and key issues to be tackled. The purpose of the strategy is to: • Generate awareness of the importance of the south west environment to people living in, working	Includes a wide range of targets including: • Increase the number of conservation areas with a conservation area appraisal to at least 29% (national average); • 100% of defined mountain, moor, heath and down and registered common land to be accessible to the public on foot by the end of 2005; • Increase the number of parish plans and	The JCS will need to consider the role of future development in decreasing the causes of climate change and adapting to its effects. The JCS should look to minimise the environmental impact of future growth. The SA Framework includes an objective on climate change and

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy
Sustainability (Integrated) Appraisal Report: Appendix IV: Baseline & Plans/Programmes Review Updates 2013 & 2014

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	in and visiting the south west; - Identify priorities for protecting and enhancing the environment for the benefit of current and future generations; - Ensure decisions are based on an understanding that social and economic activity must be undertaken within; and the carrying capacity of the region - Provide a framework for action	village appraisals carried out; and 11-15% of the region's generating capacity to come from renewable sources by 2010.	decision aiding questions relating to its causes and the adaptation to it.
State of the South West Report 2012 – South West Observatory	Provides a review of the region's economic, social, environmental and cultural life in 2012.	Establishes a number of detailed objectives and indicators relating to various issues including air quality, acid rain, climate change, biodiversity etc.	No specific relationship to JCS. The SA Framework includes objectives relating to all aspects of sustainable development.
Gloucestershire Structure Plan Second Alteration 1999 – 2011 – Gloucestershire County Council	Provides strategic planning guidance for the County focusing new development in the Principal Urban Areas. Covers the period 1991 to 2011.	- Maximising the use of brownfield sites; - Utilising the capacity identified by the joint working process on Greenfield sites well related to existing urban areas; and - Elsewhere in the County, to utilise the capacity identified by the joint working process on sites within or adjacent to towns and villages	The JCS will replace some elements of the Structure Plan. However, the JCS should have regard to earlier planning policy and strategy for the area.
Deposit Draft 3rd Alteration Gloucestershire Structure Plan (2001 - 2016) Gloucestershire County Council	This Structure Plan Third Alteration provides the strategic framework for planning how land is used in the County up to 2016. The policies in this Plan will: - guide the development of new employment and housing in urban and rural areas of the County; and - link land-use, transport, environment and economic strategies.	Using the Structure Plan we aim to make sure we provide a better quality of life for everyone living and working in the County, now and in the future by: - providing a sustainable Gloucestershire, with successful well-planned communities; - making sure there is access to jobs, homes and services; - developing a sustainable transport system; - protecting and improving the environment; and - promoting the sensible use of natural	The JCS will replace some elements of the Structure Plan. However, the JCS should have regard to earlier planning policy and strategy for the area.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		resources.	
Local Agenda 21 Strategy for a Sustainable Gloucestershire 2001 – Gloucestershire County Council	Sets out a sustainability framework for Gloucestershire.	The strategy includes the following headline objectives: • Create communities that give people the best possible access to housing, work, education and services with the least possible travel. • Promote the strengths of the local economy and encourage community enterprise to grow. • Improve wildlife habitats, historic and built environment and landscape. • Encourage renewable resources. Use fewer non-renewable resources and reduce waste. • Prevent pollution. • Identify and promote local character and culture. • Involve our community in decision-making and local action. • Help people to make the most of themselves through education, training and advice. • Help people to deal with problems which hold them back from a healthy and fulfilling life. • Help people to live free from the fear of crime and poverty.	The JCS should consider renewable energy generation within all new development. The JCS will focus on long-term development and is unlikely to be able to contribute to the targets set out in the action plan. The SA Framework includes an objective on renewable energy and decision aiding questions of specific types of generation.
Local			
Tewkesbury Local Plan 2006 (adopted Local Plan to 2011) – Tewkesbury Borough Council	The Plan's overall vision for the Borough is to ensure that development within the area contributes positively to creating sustainable communities. This will be achieved by directing development to locations where the mix of uses and proximity to existing facilities minimises the increase in transport demand whilst maximising residents' choice for access	• Promote sustainable development; • To conserve and enhance the built and natural heritage of the Borough; • To stimulate an approach to new development which: i. Respects local environmental conditions in the detailed siting and design ii. Takes full account of local eco-systems and biodiversity iii. Encourages the use of renewable resources iv. Minimises	The JCS will replace elements of all 3 constituent districts' Local Plans.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	to the range of destinations they use in their daily lives.	unnecessary reliance on private transport v. emphasises the re-use of brownfield land in sustainable locations vi. Supports innovative design solutions consistent with sustainability objectives vii. Supports more efficient use of land and promotes mixed-use development; • To stimulate a healthy local economic base; and • To meet the needs of residents whilst enhancing their quality of life.	
Cheltenham Local Plan Second Review, 1991 – 2011 (2006) – Cheltenham Borough Council	The Plan has been prepared within the context of the Gloucestershire Structure Plan Second Review and covers the period to 2011. It provides the local planning framework against which planning applications will be judged. The plan includes “Core Policies and Proposals” that set the strategy for future development of the Borough.	The Plan is intended to perform four functions: • To Develop the policies and proposals of the Structure Plan; • To develop a detailed basis for development control; • To provide a basis for co-ordinating development and other use of land; and • To bring local and detailed planning issues before the public.	The JCS will replace elements of all 3 constituent districts' Local Plans.
Gloucester City Local Plan 1983 – Gloucester City Council	The Adopted Gloucester City Local Plan is outdated. The JCS is unlikely to be influenced by its policies.		
Gloucester City Core Strategy Preferred Options 2006	Was to provide the strategic direction for future development within Gloucester City. Work ceased on the Core Strategy when the decision to undertake a joint Core Strategy was made in March 2008.	The Core Strategy contained the following vision: 'To create a fair, just and thriving community in Gloucester where no-one is disadvantaged and where economic, social and environmental well-being is promoted through careful management of new development and capitalising on the unique character and traditional urban form of this historic city'. The Strategy included 19 strategic objectives to achieve the vision.	The JCS has superseded work on the Core Strategy for Gloucester City. The JCS will replace elements of all 3 constituent districts' Local Plans.
Gloucester's City Plan 2031: Shaping Gloucester's Regeneration Journey	Once complete, the City Plan will provide the development framework to guide the future growth predicted for	The vision for Gloucester is 'The Partnership Board supports focus on the economy and our communities expressed by our residents. We	The JCS Joint Core Strategy will provide the strategic housing and employment requirements for

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
February 2012 Part 1 Context and Key Development Principles Consultation Document	the City to the year 2031. It will become a central part of Gloucester's new Local Development Plan. The aim of the City Plan is to identify where and how growth will come forward within the City boundary to deliver the City Vision and the housing and employment requirements set out within the strategic Joint Core Strategy* (JCS) document.	will work to encourage sustainable economic growth for the City's expanding population by driving forward its regeneration programme. This will strengthen the City, particularly its centre and make the most of our infrastructure.' The document also contains 13 Key Development Principles to deliver the Strategy.	Gloucester and the City Plan will sit beneath it, setting out how these requirements will be delivered through specific development sites.
Gloucester City Vision 'A City Ambitious for its Future and Proud of its Past' 2012 - 2022	The City Vision lays out the key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver. The City Vision will provide an overarching framework for all partner's strategic plans including important City Council documents such as the Joint Core Strategy and the Gloucester City Plan.	Sets out priorities under two headings: Your Prosperity: To deliver: ▪ A flourishing economy and City Centre. ▪ A vibrant evening economy. ▪ A City which improves through regeneration and development. Your Community: To deliver: ▪ A City where people feel safe and happy in their community. ▪ A healthy City with opportunities available to all.	The policies in the JCS should reflect these priorities. The SA Framework includes objectives on Economy; Health; City and Town Centres; and Sustainable Communities.
Second Stage Revised Deposit Local Plan 2002, Gloucester City Council (Adopted by the Council for development control purposes)	The purposes of the Plan are: • To provide a clear framework and policies against which development proposals in the city can be assessed; • To provide local policies and land allocations for the city that interpret the adopted Gloucestershire Structure Plan, national and regional policies; • To provide a clear framework for the co-ordination of infrastructure provision and public and private investment in	The Vision: To create a city that looks good and feels good. The Guiding Aim: To promote the economic, social, and environmental well-being of the city through careful husbandry of new development and by capitalising on the unique character and traditional urban form of this historic city.	The JCS will replace elements of all 3 co districts' Local Plans.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	the city; • To bring planning issues before the public for debate.		
Cheltenham, Gloucester and Tewkesbury Infrastructure Delivery Plan (2013)	New infrastructure will be required in order to accommodate the development proposed through the Joint Core Strategy.	The Plan evaluates the transport, utilities, community and green infrastructure and services that will be required to support the levels of housing and employment growth proposed through the JCS. To further details refer to report.	Information on potential funding sources will be required in order to implement the infrastructure requirements to facilitate development proposed through the JCS. The SA Framework includes objectives which are relevant to the IDP including: Economy; Health; City and Town Centres; Transport; and Sustainable Communities.

B) Water & Flooding

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
EU Water Framework Directive (WFD) (2000/60/EC)	The WFD sets a framework for the long-term sustainable management of water resources. It establishes a river catchment structure for the management of all inland and coastal waters including groundwater.	All rivers must be of 'good' quality by 2015.	Proposals which promote water quality in line with the Directive should be considered in the JCS. The SA Framework includes an objective on water quality and the JCS will need to contribute to the overall objectives of improving water quality.
EU Nitrates Directive 1991	To reduce and prevent water pollution caused or induced by nitrates from agricultural sources.	- Identify waters, either actually or potentially affected by nitrate pollution and designate all areas draining into such waters as vulnerable zones - Prepare action plans where pollution is likely	The SA Framework should include an objective to minimise pollution from all sources.
National			
National Planning Policy Framework (NPPF) (2012)	The NPPF states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.	The JCS will draw on evidence from the SFRA for Cheltenham, Gloucester and Tewkesbury. Development will need to be directed away from flood zone 3.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Groundwater Protection: Policy and Practice, Environment Agency 2006	The Environment Agency's core groundwater policy is: To protect and manage groundwater resources for present and future generations in ways that are appropriate for the risks that we identify.	• To provide a framework for our statutory role – to ensure we use our powers in a consistent and transparent manner. • To encourage co-operation between ourselves and other bodies with statutory responsibilities for the protection of groundwater. These include national and local government, water companies, Natural England and the Countryside Council for Wales. • To promote our policies, so that land-users and potential developers may anticipate how we are likely to respond to a proposal or activity. • To influence the decisions of other organisations on issues we are concerned about but which we do not regulate. • To ensure that groundwater protection and management are consistent with our Vision for the environment and a sustainable future. • To provide vital information and background on groundwater protection in England and Wales.	The JCS needs to consider groundwater protection and preserve the quality of water sources. The SA Framework includes an objective on water quality.
Flood and Water Management Act 2010	The Flood and Water Management Act provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges and protects water supplies to the consumer. The Act implements Sir Michael Pitt's recommendations requiring urgent legislation, following his review of the 2007 floods.	• To give the Environment Agency an overview of all flood and coastal erosion risk management and unitary and county councils the lead in managing the risk of all local floods. • To introduce an improved risk based approach to reservoir safety. • To encourage the uptake of sustainable drainage systems by removing the automatic right to connect to sewers and providing for unitary and county councils to adopt SUDS for new developments and redevelopments.	The Authorities will need to further consider the relationship between planning and flood risk management; and provide strong plan policies to implement sustainable drainage systems. The SA Framework has an objective on flood risk.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Water for people and the environment: Water Resources Strategy for England and Wales 2009	The strategy sets out how we believe water resources should be managed over the coming decades so that water can be abstracted and used sustainably. Implementing the strategy will help to ensure there will be enough water for people and the environment now and in the future.	The strategies include a series of actions that we believe need to be taken to deliver a secure water supply and safeguard the environment. These include actions that will: ▪ support housing and associated development where the environment can cope with the additional demands placed on it ▪ allow a targeted approach where stress on water resources is greatest ▪ ensure water is used efficiently in homes and buildings, and by industry and agriculture ▪ provide greater incentives for water companies and individuals to manage demand ▪ share existing water resources more effectively ▪ further reduce leakage ▪ ensure that reliable options for resource development are considered ▪ allocate water resources more effectively in the future.	The Authorities will need to further consider the relationship between planning, water resources and safeguarding the environment. The SA Framework has an objective on natural environment and resources.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Future Water – The Government's water strategy for England 2008	Future Water sets out how Defra want the water sector to look by 2030, and some of the steps we will need to take to get there. It is a vision where rivers, canals, lakes and seas have improved for people and wildlife, with benefits for angling, boating and other recreational activities, and where Defra continue to provide excellent quality drinking water.	The national strategic vision for managing water resources in England up until 2030 includes the following measures: 1. <i>Reduced per capita consumption of water to an average of 130 litres per person per day or potentially 120 litres per person a day;</i> 2. <i>Amend building regulations to include a minimum standard of water efficiency in new homes; and,</i> 3. <i>In areas of severe water stress it is believed that near universal metering will be needed.</i>	The Authorities will need to further consider the relationship between planning and water resources; and provide strong plan policies to improve water efficiency and reduce water consumption. The SA Framework has an objective on minimise the use of natural resources including water.
Water Act 2003	An Act of Parliament which amends the Water Resources Act 1991 to improve long-term water resource management.	The four broad aims of the Act are: ■ the sustainable use of water resources; ■ strengthening the voice of consumers; ■ a measured increase in competition; and ■ the promotion of water conservation. There is a requirement on local planning authorities to take steps to encourage water conservation where appropriate.	The Authorities will need to further consider the relationship between planning and water resources; and provide strong plan policies to improve water efficiency and reduce water consumption. The SA Framework has an objective on minimise the use of natural resources including water.
Regional/sub-regional:			
Water for people and the environment: Water Resources Strategy - Regional Action Plan for Midlands Region 2009	The aim for water is 'enough water for people and the environment'. The management and use of water and land must be shown to be sustainable - environmentally, socially and economically. We require the right amount of good quality water for people, agriculture, commerce and industry, and the environment.	Six key priorities for Midlands Region: ■ High-flow reservoirs (Mid4) ■ Abstractor groups and licence trading (Mid30) ■ Water efficiency (Mid32) ■ Household Metering (Mid24) ■ Conjunctive use (Mid22) ■ Restoring Sustainable Abstraction (Mid15)	The Authorities will need to further consider the relationship between planning and water resources; and provide strong plan policies to improve water efficiency and reduce water consumption. The SA Framework has an objective on minimise the use of natural resources including water.
Severn River Basin District	CFMPs help us to understand the scale	The RBMP for the Severn catchment identifies	The JCS needs to be deliverable without

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
River Basin Management Plan (RBMP)	and extent of flooding now and in the future, and set policies for managing flood risk within the catchment.	the following aims to meet the Water Framework requirements: - By 2015, 17 per cent of surface waters (rivers, lakes, estuaries) in this river basin district are going to improve for at least one biological, chemical or physical element. 34 per cent of surface waters will be at good or better ecological status/potential and 65 per cent of groundwater bodies will be at good status by 2015. - In combination 35 per cent of all water bodies will be at good or better status by 2015. - The Environment Agency wants to achieve an additional two per cent improvement to surface waters across England and Wales by 2015.	harming water quality. Positive steps that can be taken include policies on sustainable drainage and reducing pollution from development. The SA Framework includes a water quality objective.
Severn Trent Water Resources Plan 2009	Summarises the key issues that impact on the projected supply demand balance in the Severn Trent abstraction area. Sets out Severn Trent Water's proposed 25 year strategy for maintaining the balance between the supply and demand for water in the region and maintaining a service level of no more than three hosepipe bans per 100 years.	Meet all statutory obligations as a licensed water supply and waste water undertaker. - Comply with environmental legislation and meet environmental obligations - Adopt the overall least financial, social and environmental cost strategy for achieving and maintaining target headroom throughout the planning period to 2035 - Continue to promote and expand water efficiency programmes and water reuse options for businesses and consumers - Accelerate the installation of water meters and more sophisticated tariffs - Increase the scope for water transfers across the region and between water companies - Develop new sustainable water resources	The JCS needs to be deliverable without harming water quality. Water efficiency and reuse measures should be considered in the development of JCS policies. The SA Framework includes a water quality objective.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		when needed	
Severn Vale Catchment Abstraction Management Strategy (CAMS), Environment Agency 2008	Water abstraction is the removal of water, (permanently or temporarily) from rivers, canals, reservoirs or underground strata. The main challenge in managing abstraction is to meet the needs of abstractors and other water users, while leaving water in the environment to conserve aquatic habitats, especially during low river flows.	Sets abstraction licenses and limits to abstraction in terms of quantity and duration.	The JCS will provide the strategic direction for future growth. This should consider water usage and the potential effect of increased abstraction on the Severn. The SA Framework includes an objective on water quality and resource management, including water usage.
Local			
Strategic Flood Risk Assessment (Level 1 and 2)	The aim of the SFRA Level 1 is to map all forms of flood risk and use this as an evidence base to locate new development primarily in low flood risk areas (Zone 1). Areas of 'low' (Zone 1), 'medium' (Zone 2) and 'high' (Zone 3) risk are mapped using data from a variety of sources, including the Environment Agency (Midlands and Thames regions), Gloucestershire Highways, Severn Trent, British Waterways and the district councils. A Level 2 Strategic Flood Risk Assessment was commissioned by the Joint Core Strategy authorities in April 2010 and published in October 2011. This provides a more detailed assessment of areas which have been identified as potential development locations and it uses the information from SFRA Level 1 to determine which areas require a further assessment of flood risk.	SFRAs are an integral part of the planning process, and are there to assist the decision making process, guiding development towards areas of lowest flood risk. SFRAs are at the core of the NPPF 2012. The aims of NPPF 2012 are to ensure that flood risk is taken into account at all stages of the planning process, to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk.	The JCS will need to consider the detailed findings of the level 1 and 2 SFRA in developing proposals for new development.

C) Energy & Climate Change

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
Kyoto Protocol (1997)	There is a need to limit greenhouse gases in order to reduce the threat of global warming that leads to climate change.	The UK is committed to cutting its emissions to 12.5% below 1990 levels by 2012, and the European Union to an 8% reduction on 1990 levels by 2012.	The JCS should include policies that seek to reduce emissions and contribute to meeting the requirements of the protocol. The SA Framework includes an objective to reduce emissions and Decision Aiding Questions related to minimising consumption and renewable energy generation.
United Nations Framework Convention on Climate Change 2007	Countries should protect the world's climate.	• Countries should enact effective environmental legislation to control greenhouse gas emissions and should ensure the functioning of natural processes that can remove some of the gases from the atmosphere • Adopt national policies and take measures to limit emissions of greenhouse gases • Protect and improve forests and oceans, that act as sinks and reservoirs for greenhouse gases	The JCS should include policies that seek to reduce emissions and minimise the causes of climate change. The JCS should promote the development of carbon sinks. The SA Framework includes an objective to reduce emissions.
European Climate Change Programme 2000	To identify and develop all the necessary elements of an EU strategy to implement the Kyoto Protocol.	To ensure that member states meet Kyoto protocol targets.	The JCS should include policies that seek to reduce emissions and assist in meeting the targets set in the Kyoto Protocol.
National			
Energy Act 2011	The Act provides for a step change in the provision of energy efficiency measures to homes and businesses, and makes improvements to the framework to enable and secure low-carbon energy supplies and fair competition in the energy markets.	The Act has three principal objectives: tackling barriers to investment in energy efficiency; enhancing energy security; and enabling investment in low carbon energy supplies.	JCS should include policies on energy efficiency and encouraging low carbon technologies. SA will need to consider implications of JCS with regard to government energy policy.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Climate Change Act 2008	A legally binding framework to tackle the causes and consequences of climate change.	Requirements include: • An aim to improve carbon management and help the transition towards a low carbon economy in the UK; • Legally binding targets: Reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline. The 2020 target will be reviewed to reflect the move to all greenhouse gases and the increase in the 2050 target to 80%; • On adaptation the Government must report at least every five years on the risks to the UK of climate change, and publish a programme setting out how these impacts will be addressed. The Act also introduces powers for Government to require public bodies and statutory undertakers to carry out their own risk assessment and make plans to address those risks.	JCS will need to include policies to mitigate and adapt to climate change, including from development and transport impacts.
White Paper on Energy, (Meeting the Challenge) 2007	This White Paper sets out a framework for action to address the challenges facing the supply and demand for energy and helping to manage potential risks. The aim is to deliver energy security and accelerate the transition to a low carbon economy requires urgent and ambitious action at home and abroad.	• Save energy; • Develop cleaner energy supplies; and • Secure reliable energy supplies at prices set in competitive markets. • Strategy continues to be based on the principle that independently regulated, competitive energy markets, are the most cost-effective and efficient way of delivering our objectives.	The JCS needs to consider issues of infrastructure (including energy) supply. Its policies will need to facilitate a switch to carbon efficient energy generation and it should encourage the use of renewables. The SA Framework includes an objective on energy and decision aiding questions on its generation and the efficiency of its use.
SEA and Climate Change: Guidance For Practitioners, Natural England, Environmental Agency et al, 2007	Suggests how climate change issues can be considered in SEA in England and Wales. It presents information on the causes and impacts of climate change and potential adaptation and mitigation	No targets, objectives or indicators. This document provides practical guidance for undertaking SEA.	The JCS will be subject to SEA. The SA process will be designed to accommodate the requirements of SEA and the SA Framework includes climate

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	measures.		change objectives.
Zero carbon homes: Impact assessment	From 2016, developers will be required to deal with all emissions from new build homes that fall under the scope of building regulations. A specified portion of this will have to be dealt with on-site through energy efficiency measures such as insulation and onsite renewables such as solar panels. The remaining emissions can be dealt with through offsite measures, the mechanism for which has yet to be decided.	To ensure that from 2016 new homes do not add additional carbon to the atmosphere but contribute to the UK meeting its climate change targets. This will be achieved by improving the fabric energy efficiency of new homes and through driving increased use of low and zero carbon technologies.	The JCS will need to account for the government's approach to zero carbon homes and will need include policies that comply with the 2016 zero carbon target.
National Planning Policy Framework (NPPF) (2012)	The NPPF supports the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).	To create a low carbon future, Authorities should: ▪ plan for new development in locations and ways which reduce greenhouse gas emissions; ▪ actively support energy efficiency improvements to existing buildings; and ▪ when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards.	The National Planning Policy Framework must be taken into account in the preparation of the JCS. The SA will identify objectives relating to climate change.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Planning and Energy Act 2008	An Act to enable local planning authorities to set requirements for energy use and energy efficiency in local plans.	A local planning authority in England may in their development plan documents, and a local planning authority in Wales may in their local development plan, include policies imposing reasonable requirements for— (a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; (b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; (c) development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations.	The JCS should consider including policies which impose these requirements. The SA Framework includes a climate change objective.
Climate Change: The UK Programme 2006	The UK's programme is a significant contribution to the global response to climate change. It sets out a strategic, far reaching package of policies and measures across all sectors of the economy, to achieve the targets set.	Cutting UK Carbon Dioxide emissions by 60% by 2050. Indicator: amount of energy generated from renewable sources Indicator: number of new dwellings achieving level 6 Code for Sustainable Homes (carbon neutral status).	The JCS should encourage the use of renewable energy and promote renewable energy generation. The SA Framework includes a renewable energy objective.
Regional			
Warming to the idea - Building resilience to extreme weather and Climate change in the South West Climate South West (2010)	Reports on the likely effects of climate change on the South West Region. It is based on a study commissioned by a partnership of key regional stakeholders, Climate South West.	- Describe the climate change scenarios projected for the South West in the coming century; - Identify the likely impacts of such change; - Suggest actions to respond to the challenges and opportunities presented by these impacts.	The JCS should seek to reduce the causes of climate change but must also ensure that future development can adapt to the possible consequences of change. The SA Framework includes objectives on reduction and adaptation.
Gloucestershire Renewable Energy Action Plan 2005 –	The Renewable Energy Action Plan aims to help facilitate the development of	5,500 new solar water heating system installations by 2010 (this represents roughly	The JCS should consider renewable energy generation within all new

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Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Gloucestershire Sustainable Energy Group	renewable energy schemes in the county to meet the Gloucestershire target of 40-50 mw of new renewable electricity generating capacity by 2010.	2% of all existing houses in Gloucestershire) 1000 ground source heat pumps powered by renewable electricity by 2010 (approx. 0.4% of all housing stock) 5 MW of biomass heating by 2010 - To have a viable wood fuel supply business serving the county by 2010	development. The JCS will focus on long-term development and is unlikely to be able to contribute to the targets set out in the action plan. The SA Framework includes an objective on renewable energy.
Gloucestershire Energy Strategy 2007 - 2017	Strategy aims to put Gloucestershire on the path to dramatically increase its current sustainable electricity generating capacity to reach a target of 40 MW by 2010 - retaining a greater part of the estimated £700m annual energy bill, of which over 98% currently leaves the local economy	Strategy also aims to: • Guide and encourage the County in using best practice to cut carbon emissions from energy use in all sectors, and make a real contribution to the global effort to reduce the risks from climate change. • Enable every resident to have access to the basic energy services they need to have a good quality of life at an affordable price, reducing the high number of households that cannot afford to keep warm at a reasonable cost.	The JCS needs to ensure carbon reduction is a key feature of plan policies.
Local			
Gloucester City Climate Change Strategy 2010	This document identifies programmes, policies and projects that reduce Gloucester's carbon footprint and begin a process of adaptation so that Gloucester is better prepared to live in the future with a changing climate. Gloucester City Council will work in managing its estate, as a service provider and in a community leadership role to manage the activities within the city that contribute towards climate change. It will also prepare and put in place measures to reduce the harmful effects of climate	• • To increase public awareness of Climate Change and of what people and the organisations they represent can do to lessen their impacts upon the climate and how they can adapt to a changed climate. • • To maximize the reduction in greenhouse gas emissions over the strategy period and where possible exceed government and regional targets. • • To increase the amount of electricity that is generated in Gloucester from low carbon or renewable sources to a minimum of 11% by 2010 in line with Regional Planning Guidance for the South West. • • To enable Gloucester, its citizens and	The JCS needs to ensure carbon reduction and climate change adaptation are a key feature of plan policies.

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Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	change to enable a process of adaptation to occur over time.	biodiversity to adapt to the changes brought about by climate change to ensure the maintenance of a high quality of life. • To reduce emissions from the City Council estate by 10% in the year 2010 and as such sign up to the 2010 campaign.	
Cheltenham Climate Change Strategy 2005	The Overarching aim of this strategy is to make Cheltenham a carbon neutral borough.	The main objectives of this strategy are to: • raise awareness of the potential impact of climate change; • establish accurate data of greenhouse gas emissions from activities in Cheltenham; • propose measures to help prevent the causes of climate change, by aiming to reduce CO2 emissions from activities in Cheltenham by 20% from 1990 levels by 2010 and by 60% by 2050; • propose measures to help us adapt to the inevitable consequences of climate change; • and engage with external agencies and other stakeholders to gain commitment to addressing climate change issues and delivering the climate change action plan.	The JCS needs to ensure carbon reduction and climate change adaptation are a key feature of plan policies.
Tewkesbury Borough Council Climate Change Strategy 2010 - 2015	The Strategy sets out the targets that have been signed up to nationally and locally in order to reduce the council's CO2 emissions. It outlines five principles that underpin our approach to deliver improvements (sustainability, adaptation, communication, community leadership and supporting behavioural change), and a set of actions to bring about change both internally and working in partnership with businesses and the community.	Sets out 2 key targets: ▪ The target reduction for the three year reporting period is 9.1% by 2012 using the 2005 baseline. ▪ A target of 15% reduction of CO2 emissions is recommended across the Council's operations and buildings by 2015. It also has a number of actions to complete within the strategy timeframe which are outlined in the 'Action Plan.'	The JCS needs to ensure carbon reduction and climate change adaptation are a key feature of plan policies.

D) Landscape and Cultural heritage

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
Convention on the Protection of the Archaeological heritage of Europe, Revised 1992	The Valletta Treaty or Malta Convention is an initiative from the Council of Europe. The treaty aims to protect the European archaeological heritage 'as a source of European collective memory and as an instrument for historical and scientific study. All remains and objects and any other traces of humankind from past times are considered elements of the archaeological heritage. The notion of archaeological heritage includes structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other kinds as well as their context, whether situated on land or under water.	Articles 3 and 4 of the Convention concerns requirements of Member States to preserve and protect archaeological heritage. Article 5 requires member states to involve archaeologists in developing plans and decision making.	The preservation and protection of archaeological heritage is an important issue, especially when considering the selection of development sites.
Unesco World Heritage Convention	Authored by the UN Educational, Scientific and Cultural Organisation and published in 1972. Each state signed up to the Convention has to ensure the identification, protection, conservation, presentation and transmission to future generations of the cultural and national heritage situated on its territory.	To establish an effective system of collective protection of the cultural and natural heritage of outstanding universal value, organised on a permanent basis and in accordance with modern scientific methods.	The JCS should include strong policies that ensure the protection of the plan area's unique heritage.
Convention for the Protection of the Architectural Heritage of Europe adopted at Granada on 3/10/1985 (European Treaty Series)	The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. It also affirms the need for European solidarity with regard to heritage conservation and is designed to	Article 2 concerns the requirement to identify properties to be protected. Articles 3 - 5 set out the procedures to statutorily protect architectural heritage.	The JCS should include strong policies that ensure the protection of the plan area's heritage but also to allow for contemporary use and adaption when appropriate.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
No. 121)	foster practical co-operation among the Parties. It establishes the principles of "European co-ordination of conservation policies" including consultations regarding the thrust of the policies to be implemented.	Articles 10 – 13 concern the requirement to develop and adopt conservation policies and to foster both the use of protected properties in the light of the needs of contemporary life and the adaptation when appropriate of old buildings for new uses.	
European Landscape Convention 2004	The aims of the convention are to promote landscape protection, management and planning, and to organise European co-operation on landscape issues.	General measures include: ▪ Recognise landscapes in law as an essential component of people's surroundings and a foundation of their diversity. ▪ Establish and implement landscape policies aimed at landscape protection, management and planning through the adoption of specific measures. ▪ Establish procedures for the participation of regional/local authorities, general public and other parties with an interest in the formulation of the landscape policies. ▪ Integrate landscape into regional and town planning policies and into environmental, cultural, agricultural, social and economic policies.	The JCS should include strong policies that ensure the protection of the plan area's landscape.
National			
The Historic Environment: A force for our future (2001)	This statement sets out the intention of the Government to protect the historic environment, recognising its major contribution to the economy in rural and deprived communities, as well as in economic centres.		The JCS should include strong policies that ensure the protection of the plan area's unique heritage.
The Government's Statement on the Historic Environment for England	The Government Statement presents a vision for realising the potential of the historic environment and recognising the contribution that it makes to our collective aims.	Its vision is "that the value of the historic environment is recognised by all who have the power to shape it; that Government gives it proper recognition and that it is managed intelligently and in a way that fully realises its	The JCS should include strong policies that ensure the protection of the plan area's unique heritage.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		contribution to the economic, social and cultural life of the nation". The Statement sets out the value of heritage for all of these aspects and the role of Government and of its partners in recognising this. It presents six broad strategic aims for the future: strategic leadership, a protective framework, local capacity, public involvement, direct ownership and a sustainable future.	
National Planning Policy Framework (NPPF) (2012)	Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.	■ the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; ■ the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; ■ the desirability of new development making a positive contribution to local character and distinctiveness; and ■ opportunities to draw on the contribution made by the historic environment to the character of a place.	The National Planning Policy Framework must be taken into account in the preparation of the JCS. The SA has an objective relating to the protection of heritage.
National Planning Policy Framework (NPPF) (2012) – Open space	The NPPF defines Open space as 'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.	Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision are required. Policies should seek to protect existing open	The National Planning Policy Framework must be taken into account in the preparation of the JCS. The SA has an objective relating to the protection of open space.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		space, sports and recreational buildings and land, including playing fields, unless: ■ an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or ■ the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or ■ the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.	
National Planning Policy Framework (NPPF) (2012) – Green belts	The NPPF states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.	Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.	The National Planning Policy Framework must be taken into account in the preparation of the JCS.
The National Heritage Protection Plan (NHPP) 2011 - 2015	This Plan is principally but not exclusively focused on how EH will deploy its own resources and those it provides to others in order to deliver projects in the Plan. EH will ensure that its delivery centres on those activities that only it can do, or can do more efficiently and effectively than others. However, the intention is that annual reviews of the Plan will provide a framework that will: ■ encourage greater collaborative working between partner organisations;	The Plan is divided into four main stages: Foresight, Threat, Understanding, and Responses. It is supported by a range of wider strategic functions and activities carried out by English Heritage and the sector. The heart of delivery of the NHPP is the Action Plan. It arranges the flow of foresight; assessing and responding to threat; understanding what is threatened; and delivering appropriate protection and/or management responses into eight separate Measures: 1. Foresight	The JCS should include strong policies that ensure the protection of the plan area's unique heritage. The SA has an objective relating to the protection of heritage.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	- capture the priorities and aspirations of the wider community; - help deliver those aspirations, within the resources available; - become in time a comprehensive overview of planned work.	2. Strategic Threat: Assessment and Response 3. Understanding: Recognition/Identification of the Resource 4. Understanding: Assessment of Character and Significance 5. Responses: Protecting Significance 6. Responses: Managing Change 7. Responses: Protecting and Managing English Heritage Historic Properties 8. Responses: Grant-aid for Protection	
Planning (Listed Buildings and Conservation Areas) Act 1990	An Act to consolidate certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest with amendments to give effect to recommendations of the Law Commission.	This act places a statutory duty on local planning authorities in the exercise of their planning functions to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Sections 16 and 66) and to preserve or enhance the character or appearance of conservation areas (Section 72). It also gives statutory powers to local authorities to prevent deterioration and damage to listed buildings (Sections 47-56) and to offer grants for repair and maintenance (Section 57-58) and enforcement powers against damage to listed buildings (Section 59) and unauthorized works to listed buildings (Section 9).	The JCS should include strong policies that ensure the preservation (or enhancement) of the plan area's unique heritage. The SA has an objective relating to the protection of heritage.
Ancient Monuments and Archaeological Areas Act 1979	An Act to consolidate and amend the law relating to ancient monuments; to make provision for the investigation, preservation and recording of matters of archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters; to provide for the recovery of grants under section 10 of the Town and Country Planning	<u>Part I concerns the protection of Ancient Monuments.</u> <u>Part II concerns the designation of areas of archaeological importance.</u>	The JCS should include strong policies that ensure the protection of Ancient Monuments and areas of archaeological importance. The SA has an objective relating to the protection of heritage.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	(Amendment) Act 1972 or under section 4 of the Historic Buildings and Ancient Monuments Act 1953 in certain circumstances; and to provide for grants by the Secretary of State to the Architectural Heritage Fund.		
PPS 5 Planning for the Historic Environment - Historic Environment Planning Practice Guide (2011)	The NPPF supersedes Planning Policy Statement 5: Planning for the Historic Environment (PPS5) as Government Policy on the management of change to the Historic Environment in England. The PPS5 Practice Guide remains a valid and Government endorsed document pending the results of a review of guidance supporting national planning policy. The references to PPS5 policies in this document are now redundant, but the policies in the NPPF are similar and the intent is the same.	No targets, Indicators or Objectives. Provides interpretation of policy.	The JCS should consider the guidance in the development of historic environment policies.
Regional/Sub-regional			
English Heritage - A Strategy for the Historic Environment in the South West 2004	English Heritage's vision for the strategy is: Our vision is of an historic environment that is widely recognised as one of the South West's key assets and strengths and is celebrated for its richness and diversity. It is an historic environment that makes a positive contribution to economic, social and environmental regeneration. It is conserved and enhanced both for our own benefit and that of future generations.	No targets, Indicators or Objectives.	The JCS will inevitably have an effect on the historic environment of the area. The SA Framework includes an objective on the historic environment and decision aiding questions relating to character and heritage.
Cotswolds AONB Management Plan 2008-2013 – Cotswolds Conservation Board	sets out a series of objectives for the AONB which the Board wishes to see achieved. These represent the Board's current view of what it considers are the	• Healthy lifestyle recreational opportunities for all - "an inspirational breathing space away from it all"; • Opportunities for climate change mitigation	The JCS will have to have regard to the AONB management Plan and should adhere to its principles. The JCS should look to maintain and enhance the AONB

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	most important management actions which should be pursued, and which also reflect the views and aspirations of a multiplicity of stakeholders with an interest in the AONB. Actions the Board intends to take to implement these policies throughout the five years of the plan are also included.	measures; • Water supplies for an extensive area of Southern England; • Locally produced food and wood products; and • Opportunities for renewable energy generation.	and its setting. The SA Framework includes an objective on landscape character and decision aiding questions on specific local issues.
Gloucestershire Landscape Character Assessment 2006 – Gloucestershire County Council	The purpose of the Gloucestershire Landscape Character Assessment is to observe, analyse, describe and classify these variations and distinctive patterns.	Comprises a landscape character assessment of the Severn Vale, the Upper Thames Valley area and the land on the northern fringe of the Cotswolds AONB within the Vale of Moreton and Vale of Evesham.	The JCS should consider landscape character and must ensure that it is preserved. The SA Framework includes an objective covering landscape.
Local			
Cheltenham Borough Council Parks, People and Wildlife – A Green Space Strategy for Cheltenham 2009 - 2024	The document sets out the authority's vision for using its green space and the goals it wants to achieve, plus the resources, methods and time needed to meet these goals.	Vision: Working together to ensure a comprehensive network of attractive, valued and well used, locally distinct green spaces, that are accessible, safe and welcoming, which meet the existing and future needs of the community, enhance biodiversity and are managed sustainably to reduce our impact on climate change.	The JCS should consider the strategy and help achieve the vision for greenspace. The SA framework includes an objective on green space.
Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (DRAFT)	The purpose of the GCT Landscape Characterisation Assessment and Sensitivity Analysis is to analyse, describe and classify landscape patterns across the GCT area.	Protect sensitive and key landscape characters within the JCS area.	The JCS should consider landscape character and must ensure that it is preserved. The SA Framework includes an objective covering landscape.

E) Biodiversity, Fauna and Flora

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
EU Directive on the Conservation of Wild Birds (79/409/EEC)	To help towards halting biodiversity decline by the year 2010 by protecting the natural bird species across the EU.	Conserve naturally occurring bird species and designate Special Protection Areas (SPA) around important habitats.	The JCS will be subject to Habitats Regulation Assessment on its potential effects on the Severn Estuary SPA. The SA Framework contains an overarching objective on biodiversity.
Convention on Biological Diversity 1992	The world's biological diversity is valuable for ecological, genetic, social, economic, scientific, educational, cultural, recreational and aesthetic reasons. The conservation and sustainable use of biological diversity are of critical importance to meet the food, health and other needs of the growing world population.	• Develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity • Make conservation and sustainable use of biological diversity part of planning and policy making • Establish laws to protect threatened species, develop environmentally sound development around these areas • Use environmental impact assessment, with public participation, on projects that threaten biological diversity, in order to avoid or minimise damage	The JCS should promote biological diversity and should seek to avoid any detrimental effects on species and habitats. The JCS will be subject to Habitat Regulation Assessment where it is deemed to be likely to have an effect on a protected site.
IUCN Red List of Threatened Species – A Global Species Assessment (1994)	The Red List is an objective global approach for evaluating the conservation status of plant and animal species.		The JCS will consider the potential impacts that future developments could have upon plant and animal species. The SA Framework includes an objective which will ensure that all designated areas for wildlife are protected, restored and enhanced.
EU Habitats Directive (EU Directive on the Conservation of Natural Habitats and of Wild Fauna)	To promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements, this Directive makes a	• Designate special areas of conservation in order to create a coherent European ecological network according to a specified timetable	The JCS' impact on all designated sites will be subject to Habitats Regulations Assessment.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
and Flora (92/43/EEC)) 1992	contribution to the general objective of sustainable development, whereas the maintenance of such biodiversity may in certain cases require the maintenance, or indeed the encouragement, of human activities.	• Allow the designation in exceptional cases of a site which has not been proposed by a member state but which the community considers essential for either the maintenance or the survival of a priority natural habitat type or a priority species • Appropriate assessment must be made of any plan or programme likely to have significant effect in the conservation objectives of a site which has been designated or is to be designated in the future • Planning and development policies should encourage the management of features of the landscape which are of major importance for wild flora and fauna	
National			
The Conservation of Habitats and Species Regulations 2010 (as amended)	These Regulations consolidate the Conservation (Natural Habitats, &c.) Regulations 1994(1) ("the 1994 Regulations"). They also implement aspects of the Marine and Coastal Access Act 2009(2) ("the Marine Act").	These Regulations transpose Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ("the Habitats Directive"). Part 6 – Assessment of plans and projects Regulations 60 to 67 require the effect on a European site to be considered before the granting of consents or authorisations of a kind specified in regulations 68 to 101, including the grant of planning permission, consents under the Electricity Act 1989, authorisations under the Pipe-lines Act 1962, orders under the Transport and Works Act 1992, environmental permits, abstraction licences and marine works. Regulation 61 provides that a competent authority may not authorise a plan or project that may adversely affect the integrity of a European site, subject to the exceptions set out in regulation 62 (considerations of overriding	The requirements of the Act will need to be taken into account.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		public interest).Chapter 8 of Part 6 sets out similar requirements in relation to land-use plans and national policy statements.	
Wildlife and Countryside Act 1981 (as amended)	The act implements the Convention on the Conservation of European Wildlife and Natural Habitats (the 'Bern Convention') and the European Union Directives on the Conservation of Wild Birds and Natural Habitats. The Act is concerned with the protection of wildlife and their habitat (countryside, national parks and designated protected areas).	Addresses the problem of species protection and habitat loss by setting out the protection that is afforded to wild animals and plants in Britain. Indicators: species monitoring	The requirements of the Act will need to be taken into account.
Natural Environment and Rural Communities Act 2006	An Act that makes provision about: bodies concerned with the natural environment and rural communities; wildlife, sites of special scientific interest, National Parks and the Broads; Inland Waterways Amenity Advisory Council. Also amends the law relating to rights of way; includes administrative arrangements in connection with functions relating to the environment and rural affairs.	Outlines Natural England's purpose as including: (a)promoting nature conservation and protecting biodiversity, (b)conserving and enhancing the landscape, (c)securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment, (d)promoting access to the countryside and open spaces and encouraging open-air recreation, and (e) contributing in other ways to social and economic well-being through management of the natural environment.	The JCS team will need to work closely with NE as a statutory consultee to ensure the protection and enhancement of the areas natural environment.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Countryside and Rights of Way Act 2000 (CRoW) 2000	CROW extends the public's ability to enjoy the countryside whilst also providing safeguards for landowners and occupiers. It creates a new statutory right of access to open country and registered common land, modernise the rights of way system, give greater protection to Sites of Special Scientific Interest (SSSIs), provide better management arrangements for Areas of Outstanding Natural Beauty (AONBs), and strengthen wildlife enforcement legislation.	Emphasises the public's right of access to open country and common land, and gives additional protection to Sites of Special Scientific Interest (SSSI). The Act imposes a duty on public bodies, including WCC to have regard to the conservation and enhancement of the AONBs in the County. Indicators: area of land with open access increase/decrease in footpaths, bridleways, RUPPs.	The requirements of the Act will need to be taken into account.
National Planning Policy Framework (NPPF) (2012) – Natural environment	The planning system should contribute to and enhance the natural and local environment by: ■ protecting and enhancing valued landscapes, geological conservation interests and soils; ■ recognising the wider benefits of ecosystem services; ■ minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; ■ preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;	In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.	The National Planning Policy Framework must be taken into account in the preparation of the JCS. The SA framework includes objectives which cover: Biodiversity; Natural environment; green space.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
	and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.		
Working with the Grain of Nature – A Biodiversity Strategy for England 2002	Seeks to ensure biodiversity considerations become embedded in all main sectors of public policy and sets out a programme for the next five years to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems.	- Work with nature and ecosystems rather than against - Encourage community engagement with biodiversity and conservation - Develop and achieve BAP targets.	The JCS should seek to preserve or enhance biodiversity. The SA Framework includes an objective on biodiversity and potential decision aiding questions on priority species, habitats and land designations.
UK Biodiversity Action Plan 1994 & Securing biodiversity: a new framework for delivering priority habitats and species in England	The UK BAP is the UK Government's response to the Convention on Biological Diversity signed in 1992. Securing biodiversity is a framework which has been developed to enhance the recovery of priority habitats and species in England (published under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006), thereby contributing to the delivery of the England Biodiversity Strategy.	The key targets and indicators are picked up through the Local Biodiversity Action Plan	See Gloucestershire BAP.
Biodiversity 2020: A strategy for England's wildlife and ecosystem services	New biodiversity strategy for England which builds on the Natural Environment White Paper and provides a comprehensive picture of how the UK is implementing its international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea.	The mission for this strategy, for the next decade, is: to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.	The JCS should seek to protect and enhance existing biodiversity and consider implications of climate change on biodiversity.
Circular 06/2005 Biodiversity	Provides guidance on the application of	No targets, Indicators or Objectives. Provides	The JCS should consider the guidance in

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
and Geological Conservation	the law relating to planning and nature conservation.	interpretation of policy.	the development of natural environment policies.
Planning for Biodiversity and Geological conservation: A Guide to Good Practice 2006	The NPPF supersedes Planning Policy Statement 9: Planning for the Historic Environment (PPS9) as Government Policy on the management of change to the Historic Environment in England. The PPS9 Practice Guide remains a valid and Government endorsed document pending the results of a review of guidance supporting national planning policy.	No targets, Indicators or Objectives. Provides interpretation of policy.	The JCS should consider the guidance in the development of natural environment environment policies.
Regional			
South West Biodiversity Implementation Plan 2004 & review of South West Biodiversity targets 2008	Provides a strategic framework for regional and local biodiversity partnerships in conserving biodiversity. It also helps raise awareness of the importance of biodiversity to the regions health, quality of life and economic productivity.	Maintaining 40,000km of linear resource Maintaining the current 11,000 ha of wood pasture and parkland.	The JCS will need to consider its effect on biodiversity and should look to preserve or enhance it. The SA Framework includes an objective on biodiversity.
A Local Delivery Plan for Biodiversity: a new framework for delivering Priority Habitats and Species in Gloucestershire	To provide clear strategic objectives and priorities, through an agreed joint work programme, for the development of the Gloucestershire Biodiversity Partnership and the implementation of the Gloucestershire Biodiversity Delivery Plan (Local Biodiversity Action Plan) during the period 2010 – 2015.	Vision: A landscape rich in wildlife, where wild species and habitats are part of healthy, functioning ecosystems that are well-managed and valued by everyone. The conservation of biodiversity is a natural consideration of policies and decisions and is integrated with social, cultural and economic activities. Strategic Objective 1: Enhance and protect biodiversity by preventing habitat loss and degradation to secure healthy, functioning ecosystems Strategic Objective 2: Facilitate the adaptation of the natural environment so that it can be	The JCS should consider the requirements of the habitats and species set out in the Plan and should aim to maintain or enhance wider biodiversity. The SA Framework includes an objective on biodiversity.

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Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		resilient to climate change Strategic Objective 3: To realise fully the true value of Gloucestershire's natural environment as a foundation for sustainable development and the health and well-being of our local communities. Strategic Objective 4: Develop the Gloucestershire Biodiversity Partnership so that it is financially sound, well supported and effective in delivering its work programme through enhanced joint working.	

F) Air Quality

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
EU Air Quality Framework Directive (Directive 96/62/EC) 1996 Directive 99/30/EC (the first Air Quality Daughter Directive) sets ambient air limit values for nitrogen dioxide and oxides of nitrogen, sulphur dioxide, lead and particulate matter. Directive 2000/69/EC (the second Air Quality Daughter Directive) sets ambient air limit values for benzene and carbon monoxide. Directive 2002/3/EC (the third Air Quality Daughter Directive) sets ambient air limit values for ozone.	Sets out an EU wide system for setting binding air quality objectives for specific pollutants to protect human health and the environment. The first Air Quality Daughter Directive sets ambient air limit values for nitrogen dioxide and oxides of nitrogen, sulphur dioxide, lead and particulate matter. The second Air Quality Daughter Directive sets ambient air limit values for benzene and carbon monoxide. The third Air Quality Daughter Directive sets ambient air limit values for ozone.	- Member States must put in place systems for assessing the quality of ambient air based upon common methods and criteria - Member States must maintain ambient air quality where it is good and improve in other cases, by means of plans and programmes for action. The daughter Directives set specific limit values for air quality.	The JCS should consider the maintenance or improvement of air quality. The SA Framework includes an objective on air quality.
National			
Environment Act Part IV- LAQM 1995	Requires local authorities to review and assess the current and likely future, air quality in their areas.	Where a Local Authority considers that one or more of the air quality objectives, as prescribed in regulations, is unlikely to be met by the required date, it must declare an air quality management area (AQMA), covering the area where the problem is expected. It must then draw up an action plan setting out the measures it intends to take in pursuit of the air	The JCS should seek to reduce air pollution and improve air quality, especially where there are currently Air Quality Management Areas (AQMA) designated. The SA Framework includes an objective on pollution and decision aiding

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		quality objectives in the area.	questions on air quality and AQMAs.
The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, 2007 (DEFRA)	The Strategy provides a clear, long-term vision for improving air quality in the UK and offers options for further consideration to reduce the risk to health and the environment from air pollution.	- The primary objective is to ensure that all citizens should have access to outdoor air without significant risk to their health, where this is economically and technically feasible. - The aim is to have a steady decrease in ambient levels of pollutants towards the objectives over the period of the implementation.	The JCS should seek to reduce air pollution and improve air quality, especially where there are currently Air Quality Management Areas (AQMA) designated. The SA Framework includes an objective on pollution and decision aiding questions on air quality and AQMAs.
Regional/Sub-regional			
Air Quality Strategy for Gloucestershire, 2004 – Gloucestershire County Council. The 2010 Air Quality Updating and Screening Assessment.	Provides an important framework for maintaining good air quality and improving upon poor air quality over the years ahead.	No specific targets, indicators or objectives.	The SA framework includes an objective on air quality and may include decision aiding questions relating to specific local issues.

G) Waste, Minerals & Soil

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
EU Landfill Directive (99/31/EC)	The Directive introduces stringent technical requirements for the operation of landfills. It is intended to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.	• By 2010 to reduce biodegradable municipal waste land filled to 75% of that Produced in 1995. • By 2013 to reduce biodegradable municipal waste land filled to 50% of that produced in 1995. • By 2020 to reduce biodegradable municipal waste land filled to 35% of that produced in 1995.	The JCS should aim to include proposals that will assist in meeting the targets set in the directive. The SA Framework includes objectives on waste minimisation and decision aiding questions on minimisation, recycling and reuse.
Directive 2008/98/EC on waste (Waste Framework Directive)	Directive 2008/98/EC sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. It explains when waste ceases to be waste and becomes a secondary raw material (so called end-of-waste criteria), and how to distinguish between waste and by-products.	The Directive lays down some basic waste management principles: it requires that waste be managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants or animals, without causing a nuisance through noise or odours, and without adversely affecting the countryside or places of special interest. The Directive introduces the "polluter pays principle" and the "extended producer responsibility". It incorporates provisions on hazardous waste and waste oils (old Directives on hazardous waste and waste oils being repealed with the effect from 12 December 2010), and includes two new recycling and recovery targets to be achieved by 2020: 50% preparing for re-use and recycling of certain waste materials from households and other origins similar to households, and 70% preparing for re-use, recycling and other recovery of construction and demolition waste. The Directive requires that Member States adopt	The JCS should consider policies that would reduce waste arisings. It should also consider the possibility of utilising waste as a means of power generation. The SA Framework includes an objective to reduce waste arisings and promote reuse and recycling.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		waste management plans and waste prevention programmes.	
National			
National Waste Strategy 2000 (England and Wales)	The National Waste Strategy sets out the need for a change in thinking about waste. Landfill sites are running out and using landfill as a means of disposal is a missed opportunity. The Strategy is largely brought into the planning framework by PPS10.	• Reducing land filled industrial and commercial waste to 85% of 1998 levels. • To recycle or compost at least: 30% of household waste by 2010 and 33% by 2015. • To reduce biodegradable municipal waste land filled to 75% of that produced in 1995 by 2010, to 50% by 2013 and to 35% by 2020 • To recover value from 45% of municipal waste by 2010 and 67% by 2015.	The JCS will not directly deal with waste policy. However, the JCS can facilitate waste management and require new development to promote reduction, reuse and recycling. The SA Framework includes an objective to promote the waste hierarchy.
Waste Strategy For England, 2007	The Waste Strategy for England, together with the NPPF, implements the EC Waste Directive. The strategy's key message is that we are consuming resources at unsustainable levels and that this needs to be addressed by a variety of means such as reduction, reuse and recycling.	• Decouple waste growth from economic growth. Emphasise prevention and re-use • Meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste • Increase diversion from landfill of non-municipal waste • Secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste • Get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste.	The JCS will not directly deal with waste policy. However, the JCS can facilitate waste management and require new development to promote reduction, reuse and recycling. The SA Framework includes an objective to promote the waste hierarchy.
Government Review of Waste Policy in England 2011	The review of waste policy in England (2011) set out 13 commitments that will set us on the path towards a zero waste economy. It prioritises efforts to manage waste in line with the waste hierarchy and reduce the carbon impact of waste.	Aims to develop a new National Waste Management Plan by the end of 2013.	None.
National Planning Policy	It sets out the core planning principles	In performing an environmental role planning	The National Planning Policy Framework

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Framework 2012	and policies for England and how they are expected to be applied. It provides guidance for LPAs and decision-takers, both in drawing up plans and making decisions about planning applications.	should contributed to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. Local planning authorities should set out the strategic priorities for the area in the Local Plan which should deliver waste management.	must be taken into account in the preparation of the JCS. The SA Framework includes an objective to minimise waste to landfill.
Planning Policy Statement 10: Planning for Sustainable Waste Management	The overarching objective of Government policy on waste is to protect human health and the environment by producing less waste and by using it as a resource wherever possible. The NPPF 2012 states that 'the Waste Planning Policy Statement will remain in place until the National Waste Management Plan is published.'	There are a number of key planning objectives, including: 1. Help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for; 2. Provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities; and 3. Ensure the design and layout of new development supports sustainable waste management.	The PPS must be taken into account in the preparation of the JCS. The SA Framework includes an objective to minimise waste to landfill.
Regional and sub-regional			
Regional Waste Strategy for the South West 'From Rubbish to Resource' 2004 – 2020 – South West Regional Assembly	Aims to ensure that by the year 2020 over 45% of waste is recycled and reused and less than 20% of waste produced in the region will be land filled.	• Reduce the amount of waste we all produce • Reuse as much as possible • Recycle • Recover as much value as we can from what is left • As a last resort: dispose of the left over waste as close as possible to where it is produced	Waste policy will largely be dealt with by the County Council's Waste Core Strategy. However, the JCS should encourage waste minimisation and promote the waste hierarchy. The SA framework includes an objective

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		• Always look for solutions which give the best practicable outcome environmentally • Work together across geographic boundaries for more effective solutions to waste issues	on waste.
Gloucestershire Waste Partnership Joint Strategy Statement, 2007	The overall aim therefore is to deliver effective communications campaigns to increase participation in waste minimisation, recycling and composting schemes.	• Increase collection of dry recyclables through kerbside, bring sites and HRCs to maximise diversion of materials; • Introduce kitchen (food) waste collection for composting; • Reduce residual waste capacity to compensate the reduction in volume produced; • Continue to provide composting capacity for green waste.	The JCS should ensure that development is planned in such a way as to make the implementation of the strategy feasible. The SA Framework includes an objective on waste and decision aiding questions on the waste hierarchy.
Gloucestershire Waste Core Strategy 2012	It explains how the County Council and its partners will address the issue of planning for waste management in Gloucestershire in the period 2012 to 2027.	Extract of the vision: 'By 2027 Gloucestershire is a clean, green, healthy and safe place in which to live, work and visit. Residents and businesses are fully aware of the economic and environmental importance of waste management, including its impact on climate change and proactively minimise their waste production to achieve 'zero-growth' across all waste streams by 2020. Five strategic objectives: Strategic Objective 1 – Waste Reduction Strategic Objective 2 – Re-use, Recycling and Composting Strategic Objective 3 – Other Recovery (including energy recovery) Strategic Objective 4 – Waste Disposal Strategic Objective 5 – Minimising Impact	The JCS should consider waste policy and include policies that promote the waste hierarchy.
Minerals Core strategy (not yet adopted)	The Minerals Core Strategy is a Development Plan Document. This means that when it is adopted, it will form part of the statutory development plan	'By 2026 Gloucestershire will be a clean, green, healthy and safe place in which to live, work and visit. It will be a leading county in managing its mineral resources and a successful	The JCS should consider the aims and policies with regard to the efficient use of minerals resources.

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	for Gloucestershire and will be used for determining planning applications for minerals development.	contributor towards the achievements of sustainable development, sustainable communities, and reducing the impacts of climate change.'	
Gloucestershire Minerals Local Plan 2003 – Gloucestershire County Council	Provides the detailed policies to control and guide all future mineral development in the County.	The primary objective of the Minerals Local Plan is for mineral extraction to be managed in a sustainable way.	Minerals policy is unlikely to be dealt with in the JCS or SA Framework. Sustainable resource use should be promoted.
Gloucestershire Waste Local Plan 2002 – 2012 – Gloucestershire County Council	The Gloucestershire Waste Local Plan sets out the land use planning framework for the development of waste management facilities in the county. The plan also considers the transportation of waste and specific sites for the storage, management and disposal of waste.	The plan includes a number of specific local targets including targets relating to recycling and composting, waste recovery and landfill reductions on biological content.	The JCS should consider waste policy and include policies that promote the waste hierarchy.
Gloucestershire Waste Minimisation in Development Projects (SPD)	Supplementary planning document providing guidance on how waste, generated during the construction and occupation of new developments, can be effectively minimised with smarter use of construction materials and increased recycling.	The principles of waste minimisation are: ▪ To design proposals sustainably; ▪ To reduce the amount of waste generated from development; ▪ To conserve natural resources through re-using waste arising from construction; ▪ To re-use waste materials on-site to reduce transportation; ▪ To use recycled materials where possible; ▪ To reduce waste generation during the operational lifetime of the development, and facilitate recycling where waste does arise.	The JSC should consider the principles of the SPD and include policies on waste minimisation. The SA Framework includes an objective on waste and decision aiding questions on the waste hierarchy.

H) Communities & Housing

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
National			
The Localism Act (2011)	The Act aims to shift power from central government back into the hands of individuals, communities and councils. It aims for a radical shift in the balance of power and to decentralise power as far as possible to individuals, neighbourhoods, professionals and communities as well as local councils and other local institutions.	The Localism Act includes five key measures that underpin the Government's approach to decentralisation. • Community rights • Neighbourhood planning • Housing • General power of competence • Empowering cities and other local areas	The Council's will need to consider the implications of the Localism Act in preparing the Core Strategy, in particular how neighbourhood plans can help deliver sustainable development in the plan area.
Welfare Reform Act (2012)	The Act introduces a wide range of reforms that aim to deliver the commitment made in the Coalition Agreement and the Queens Speech to make the benefits and tax credits systems fairer and simpler by: - creating the right incentives to get more people into work by ensuring work always pays; - protecting the most vulnerable in our society; and - delivering fairness to those claiming benefit and to the taxpayer.	The Bill provides for the introduction of a 'Universal Credit' to replace a range of existing means-tested benefits and tax credits for people of working age, starting from 2013. Other areas include: • introduces Personal Independence Payments to replace the current Disability Living Allowance • restricts Housing Benefit entitlement for social housing tenants whose accommodation is larger than they need • up-rates Local Housing Allowance rates by the Consumer Price Index • amends the forthcoming statutory child maintenance scheme • limits the payment of contributory Employment and Support Allowance to a 12-month period • caps the total amount of benefit that can be claimed.	The JCS will reflect economic factors which will encourage and promote employment opportunities. The SA will assess through a number of objectives how development will help promote employment opportunities as well as improving existing service centres.
Strong and Prosperous Communities White Paper 2006	The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services	There will be around 35 priorities for each area, tailored to local needs through Local Area Agreements. Instead of the many hundreds of indicators currently required by central government there will be a single set of about 200 outcome based indicators covering all important national priorities like climate change, social exclusion	The JCS will be heavily influenced by the Gloucestershire Local Area Agreement and should aim to achieve the targets it sets out. The SA Framework will be tested

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	through a rebalancing of the relationship between central government, local government and local people.	and anti-social behaviour. This indicator set will include citizen satisfaction and perception measures; and citizens and communities everywhere will be able to examine performance against the indicators to know how well their local area is doing.	against the Local Area Agreement to ensure that all relevant targets are represented by either objectives or decision aiding questions.
Our Shared Future, 2007 (Commission On Integration and Cohesion)	Our Shared Future sets out our practical proposals for building integration and cohesion at a local level.	• Sense of shared futures • Emphasis on a new model of rights and responsibilities • New emphasis on mutual respect and civility • Deliver a visible social justice	The JCS need to consider community cohesion and ensure that it promotes integrated communities. The SA Framework includes an objective on inequality.
Community Infrastructure Levy (2010)	Provides system to fund new local infrastructure through new development. CIL is a charge that will be payable by developers when they begin construction of new developments	Confirms the funding method for delivery of major aspects of the infrastructure requirements for development.	The SA can help to make recommendations for the infrastructure required.
National Planning Policy Framework (NPPF) (2012)	The framework seeks to streamline national planning policy into a consolidated set of priorities to consider when planning for and deciding on new development.	Housing Councils must be ambitious in delivering the much needed new homes that their communities need. Together with incentives for communities to accept growth, the Framework makes clear councils should ensure their Local Plan meets the full demand for market and affordable housing in their areas. The Framework maintains the expectation that councils should have a rolling five year supply of deliverable sites to meet their housing needs with at least a 20% additional allowance to create competition and choice in the land market. They should also bring back into use empty homes and buildings wherever possible. The Framework will remove the Whitehall target specifying the levels of housing development that should take place on previously developed land. It will put decision making power back into the hands of local	The National Planning Policy Framework must be taken into account in the preparation of the JCS.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		people, rather than imposed upon by central directives. Town centres The Government is fully committed to supporting town centres and protecting the local high street. Town centres should be recognised by councils as being at the heart of communities. Local authorities should pursue policies that support the viability and vitality of town centres. The Framework maintains the 'town centres first' policy approach which means that retail and leisure development should look for locations in town centres first, and only if suitable sites are not available look for edge of centre and then out of centre sites.	
Planning for Travellers 2012	The document sets out the proposed new, single Planning Policy for traveller sites.	The new policy aims to: ■ enable local planning authorities to make their own assessment to set their own pitch/plot targets ■ encourage local planning authorities to plan for sites over a reasonable timescale ■ protect Green Belt from development ■ reduce tensions between settled and traveller communities in the planning system ■ remove repetition of national planning policy that is set out elsewhere ■ remove unjustified differences in policy in the two circulars, and between the two circulars and other policy statements ■ remove unnecessary guidance and context so that planning policy documents contain only policy ■ ensure that local planning authorities, working together, have fair and effective strategies to meet need through the identification of land for sites ■ promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites ■ reduce the number of unauthorised developments	The document must be taken into account in the preparation of the JCS.

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		and encampments and make enforcement more effective if local planning authorities have had regard to this policy - ensure that the development plan includes fair, realistic and inclusive policies increase the number of traveller sites, in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply - reduce tensions between settled and traveller communities in plan making and planning decisions - enable provision of suitable accommodation from which travellers can access education, health, and welfare and employment infrastructure.	
Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society 2008	This strategy sets out the Governments' response to the global challenge of ageing. It also outlines plans for making sure that there is enough appropriate housing available in future to relieve the forecasted unsustainable pressures on homes, health and social care services.	The vision is to prepare communities for the multiple changes that they will face; to 'future proof' society so that it does not alienate or exclude; and to allow everybody, regardless of age, to participate and enjoy their home and their environment for as long as possible. To succeed in providing appropriate housing and effective care to all in a more targeted manner, there must be a coherent, joined-up, plan – that is why we need a National Strategy for Housing in an Ageing Society.	The JSC needs to ensure that housing meets the needs of the ageing society.
Sustainable Communities: A Shared Agenda, A Share of the Action. A guide for Local Authorities 2006	This guide shows how local outcomes such as those reflected in the seven shared priorities, can be delivered in a way that helps create genuinely sustainable communities. It highlights the cross-cutting issues which need to be addressed for each outcome.	7 Shared Priorities: - Creating safer and stronger communities - Improving the quality of life of older people and children, young people and families at risk - Meeting transport needs more effectively - Promoting healthier communities and narrowing health inequalities - Promoting the economic vitality of localities - Raising standards across our schools - Transforming the local environment	The JSC should consider the guidance to help create sustainable communities.
Regional/Sub-regional			
Joining Up - Culture South	Encourages increased participation in	No specific targets, objectives or indicators.	The JCS should consider the effect

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West, 2004	cultural activities across the South West, seeks to improve the quality and relevance of the regions cultural activities and aims to celebrate the regional identity and rich diversity of South West cultural life and tradition.		of development on the area's cultural heritage. The SA Framework includes an objective on culture and heritage.
Creating Sustainable Communities In The South West 2005 - ODPM	Outlines much of the work being done to create sustainable communities in the South West.	• Delivering a better balance between housing supply and demand; • Ensuring people have decent places to live; • Tackling disadvantage; • Delivering better services through strong effective local government; and • Promoting the development of the region	Sustainable development should be at the heart of the JCS. The SA Framework includes objectives on the economy, environment and society.
Leadership Gloucestershire	Leadership Gloucestershire (LG) brings together public sector organisations which allocate and spend significant resources in Gloucestershire. Its role is to provide vision, leadership and strategic direction in those areas where it is vital for organisations to work together to meet the needs of the people and communities of Gloucestershire in the most cost effective way. LG will work together to reduce current costs, minimise future costs and deliver better outcomes for the benefit of the people of Gloucestershire. They will work with others to achieve their objectives.	Draft work programme for 2013/ 2014 includes the following priorities: ■ Gloucestershire Health & Wellbeing Board - To oversee the effective functioning of the Gloucestershire Health and Wellbeing Board ■ Driving economic Growth - To work with the Gloucestershire Local Enterprise Partnership (LEP) to ensure they lead and champion the economic growth agenda. ■ Police and Crime - To maintain oversight of police and crime issues, recognising the roles of the new Independent Police and Crime Commissioner and the Police and Crime Panel as scrutiny body. ■ Planning and Infrastructure - The adoption of a "Gloucestershire family" approach to planning and infrastructure development. ■ Assets - The development of a "One Gloucestershire" approach to assets/estates. ■ Shared Services - To oversee the public sector	The JCS should reflect the spatial implications of the priorities of the work programme of the three Councils' Sustainable Community Strategies and the wider Gloucestershire Strategy. The SA Framework includes objectives that relate to all aspects of: Economy and Sustainable communities.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		approach to shared services. ■ Troubled Families/Community Budgets - To oversee the development of the Troubled Families/Community Budget initiatives. ■ Promoting Gloucestershire - To promote Gloucestershire and the agreed priorities.	
Local			
The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)	The original strategy was developed by the Tewkesbury Borough Local Strategic Partnership which brings together key agencies, organisations and partnerships from the public, private, community and voluntary sectors. The Sustainable Community Strategy plays an important role in providing the long term vision which takes into account these challenges whilst continuing to deliver our local communities priorities	Vision: A Borough of healthy, strong, thriving and sustainable communities, both rural and urban, where people want to live, work and visit. • Ambition 1: A Thriving Economy • Ambition 2: A Healthy, Safe & Inclusive Community • Ambition 3: A Sustainable Natural & Built Environment	The JCS should reflect the spatial implications of the 3 districts' Sustainable Community Strategies.
Cheltenham Sustainable Community Strategy: Our Cheltenham, Our Future, 2008–2011	The Strategy has been prepared by the Cheltenham Strategic Partnership, which brings together the key organisations and partnerships in the Borough. The strategy aims to fulfil the following vision for Cheltenham: "To deliver a sustainable quality of life, where people, families, their communities and businesses thrive; and in a way which cherishes our cultural and natural heritage, reduces our impact on climate change and does not compromise the quality of life of present and future generations".	The Sustainable Community Strategy is underpinned by 3 principles: • The principle of community engagement and participation; • The principle of tackling inequalities and promoting cohesion; and • The principle of tackling climate change The Sustainable community strategy also contains a set of thematic ambitions to: • Promote community safety; • Promote sustainable living; • Promote a strong and sustainable economy; • Build healthy communities and support older people; • Build stronger communities and support housing	The JCS should reflect the spatial implications of the 3 districts' Sustainable Community Strategies.

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Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		choice; • Focus on children and young people; • Invest in environmental quality; • Invest in travel and transport; and • Invest in arts and culture.	
Gloucester City Vision 2012 - 2022	The Gloucester City Vision 2012- 2022 document sets out what we want to achieve for the City over the next ten years. The City Vision lays out our key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver. The City Vision will provide an overarching framework for all partner's strategic plans including important City Council documents such as the Joint Core Strategy and the Gloucester City Plan.	Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. Aims: • A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors. • A vibrant evening economy. • A City which improves through regeneration and development. • A City where people feel safe and happy in their community. • A healthy City with opportunities available to all.	The JCS should reflect the spatial implications of the 3 districts' Sustainable Community Strategies.
Tewkesbury Borough Council Empty Homes Strategy 2008 - 2013	The new Empty Homes Strategy includes bringing together information and actions from existing strategies to encourage owners to bring their properties back into use and ultimately to deter them from leaving their homes empty.	The aims and objectives of the Empty Homes Strategy include: ■ To maximise the re-use of empty homes and other buildings ■ To provide good quality affordable housing ■ To ensure programmes meet a range of housing needs, whilst providing a choice of accommodation and neighbourhood	The JCS should consider the aims and objectives of the strategy.
Cheltenham Borough Council Vacant Property Strategy / Framework 2011 - 2015	The key aim of this strategy is to encourage owners to bring their properties back into use and ultimately to deter them from leaving their homes empty.	Other aims and objectives: ■ To maximise the re-use of empty homes and other buildings ■ To minimise the need for the future development of greenfield sites and protect the environment ■ To improve and conserve the existing built environment ■ To help provide good quality affordable housing	The JCS should consider the aims and objectives of the strategy.

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		▪ To ensure programmes meet a range of housing needs, whilst providing a choice of accommodation and neighbourhood ▪ To raise public awareness of the issue of empty homes ▪ To maintain robust records on empty properties and to monitor trends.	
Tewkesbury Borough Council Housing and Homelessness Strategy 2012 - 2016	The Housing and Homelessness Strategy 2012-2016 takes into account the aims of the national strategy but also considers how Tewkesbury will need to work at a more local level to make a real difference to residents across Tewkesbury Borough.	The strategy has four main themes under which a number of priority actions have been identified, each with objectives to be achieved: 1. Housing supply and delivery of good quality affordable housing 2. Homelessness and Homelessness Prevention 3. Housing to meet the housing needs of specific groups 4. Neighbourhoods and housing standards	The JCS should consider the priorities identified and objectives set by the strategy.
Cheltenham Borough Council Housing and Homelessness Strategy 2012 - 2017	The Housing and Homelessness Strategy 2012-2017 takes into account the aims of the national strategy but also considers how Cheltenham will need to work at a more local level to make a real difference to residents across Cheltenham Borough.	Vision: 'is for residents to be able to access and maintain suitable, affordable accommodation within communities that are safer, stronger and healthier. It sets out the following priorities: ▪ Priority 1: To increase the provision of Affordable Housing ▪ Priority 2: To make best use of existing housing stock ▪ Priority 3: To improve access into suitable, affordable accommodation and helping households to stay in their homes for longer ▪ Priority 4: To tackle the causes of homelessness ▪ Priority 5: To create stronger, safer and healthier communities	The JCS should consider the priorities identified by the strategy.

I) Economy, Employment and Education

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
Europe 2020	Europe 2020 is the EU's growth strategy for the coming decade. The aims are for the EU to become a smart, sustainable and inclusive economy. These three mutually reinforcing priorities should help the EU and the Member States deliver high levels of employment, productivity and social cohesion.	The Union has set five ambitious objectives - on employment, innovation, education, social inclusion and climate/energy - to be reached by 2020.	The SA Framework includes an objective relating to employment.
The European Employment Strategy 1997	Strategies for job creation and quality, a better balance between the demands of work and personal life.	The creation of National Action Plans	The JCS should expand include policies on job creation. The SA Framework includes an objective relating to employment and decision aiding questions on employment types.
National			
Local Growth White Paper (2010)	Sets out the Government's proposals for rebalancing the economy. Planning is seen as one of the main "barriers" to growth. The key proposals include provisions now set out in and Localism Act as well as proposed changes to the development management regulations and NPPF.	Proposals include: decentralising growth and decision-making to the local level, improving efficiency in the supply of land, providing incentives for places that support growth, and tackling the "barriers" to growth.	The JCS should take account of the proposals when developing policies. The SA Framework includes an objective relating to employment and decision aiding questions on employment types.
National Planning Policy	The national planning policy framework	Local Plans should set out strategic priorities to	The National Planning Policy Framework

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Framework (NPPF) 2012	aims to reform the planning system to make it less complex and more accessible, and to promote sustainable growth. The NPPF streamlines existing Planning Policy Statements, Planning Policy Guidance Notes and circulars to form a single consolidated document which promotes sustainable development.	perform an economic role as part of achievable sustainable development by: - contributing to building a strong, responsive and competitive economy; - ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and - identifying and coordinating development requirements, including the provision of infrastructure.	must be taken into account in the preparation of the JCS.
PPS 4 Planning for the Town Centres – Good practice Guide Practice Guide 2009	The NPPF supersedes Planning Policy Statement 4: Planning for town centres (PPS4) as Government Policy on the management of change to the Historic Environment in England. The PPS4 Practice Guide remains a valid and Government endorsed document pending the results of a review of guidance supporting national planning policy.	No targets, Indicators or Objectives. Provides interpretation of policy.	The JCS should consider the guidance in the development of town centres.
Regional/sub regional			
The Cultural Strategy for the South West 'In search of Chunky Dunsters' 2001 – Culture South West	By 2010 there will have been a major, measurable increase in the number of people who take part in, enjoy and value a range of enhanced cultural activities across the region.	- Encourage increased access to and participation in cultural activities across the South West, capitalising on the latest developments in Information and Communications Technology. - Improve the quality and relevance of the region's cultural facilities and activities. - Support and help develop the South West's cultural and creative industries. - Celebrate our regional identity and the rich diversity of South West cultural life and traditions.	The JCS should address the individual character and culture of the JCS area and the individual towns within it. The SA framework includes an objective on culture and heritage and may use decision aiding questions that relate specifically to the culture of the JCS area or individual areas within it.
A Guide to Sustainable Tourism in the South West	Acknowledges the dependence the South West region has on tourism and the	No specific targets, indicators or objectives.	The JCS should address the role of tourism within the local economy and will

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
2000 – Local Sustainability Group for the South West	natural resource of the outstanding natural environment. Provides a sustainability checklist for local authorities to use when assessing new tourist developments in order to assess the impact of the proposal on the local and wider natural environment.		need to consider how this can be achieved sustainably. The SA Framework includes an objective relating to tourism and culture.
Gloucestershire Integrated Economic Strategy 2009 -2015	"To create and foster in Gloucestershire a sustainable, low carbon economic environment in which businesses flourish, communities thrive, and individuals have the opportunity to reach their potential".	The purpose of the Gloucestershire Economic Strategy 2009-2015 is to: ■ Establish an ambitious vision for the Gloucestershire economy together with the key priorities that will deliver this vision. ■ Provide a strategic framework to guide investment in the County's infrastructure and economy. ■ Use and influence national policies and regional strategies and plans to the benefit of Gloucestershire. ■ Provide the clarity to enable an effective Three Year Delivery Plan, revised annually, to be agreed and delivered by partners. ■ Guide the development of Joint Strategic Commissioning Plan (JSCP) targets – The five themes in the JSCP's are Safer & Stronger Communities, Healthier Communities and Older People, Children & Young People, Natural & Built Environment and Economic Development & Enterprise for which Gloucestershire First is	The JCS should consider the long-term aspirations of the strategy for the economy of the JCS area. The JCS should provide the planning framework within which the economy of the area can develop, while ensuring that this is achieved without compromising sustainability. The SA Framework will include economic objectives and is likely to include a specific objective relating to rural issues and decision aiding questions on the rural economy.

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		responsible. Replace with a single economic strategy the previous Economic, Rural, Urban and Energy Strategies.	
Gloucestershire First Economic Partnership Plan 2010 – 2011	This plan is designed to deliver the Gloucestershire Integrated Economic Strategy 2009-2015 (IES), which was approved in August 2009.	It sets out 6 strategic outcomes (including the priority outcome – Recession Recovery) for delivery: 1. Economic Recovery – driving economic recovery, (delivering the Gloucestershire Economic Taskforce work plan). 2. A Gloucestershire Economy – Strengthening Gloucestershire's identity so that it is widely recognised as a place where the economy thrives in both the urban and rural areas and in all communities. 3. A Competitive, Connected Economy – Promoting a more competitive, connected and productive Gloucestershire economy in terms of sector diversity, through stimulating innovation and enhancing employment opportunities. 4. A Low Carbon Economy – Developing an exemplary low carbon economy in Gloucestershire. 5. A Sustainable, Resilient Economy – Ensuring a more resilient economy adapted to the impacts of climate change and natural and manmade disasters, which realises fully the economic potential of the County's environment and protects it for future generations. 6. A Skilled, Working Economy – Maximising the potential of the people of Gloucestershire by developing skills and talent, minimising unemployment and increasing the proportion of high value productive jobs within the County.	Consideration needs to be given to how the JCS can contribute to economic development and strengthen the economy of the area. The SA Framework will include economic objectives.
Local			
Tewkesbury Borough Council	Sets out a plan to help the recovery of	The key areas of activity are as follows:-	Consideration needs to be given to how

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Economic Development and Tourism Strategy 2012 - 2015 - Regenerating and Growing the Economy	the economy in the Tewkesbury area.	1) Theme 1 - Business Development & Support i. Grow and develop competitive businesses ii. Support and nurture emerging growth sectors iii. Support and sustain a vibrant rural economy 2) Theme 2 - Place Potential i. Increase the potential of retail sectors in the borough ii. Ensure appropriate supply of employment land and premises and local infrastructure, encouraging increased levels of business investment 3) Theme 3 - Marketing & Investment i. Increase the volume & Value of tourism in the borough ii. Encourage increased levels of inward investment iii. Ensure the promotion of the retail centres within the borough 4) Theme 4 - Human Resources i. Raise the skills levels of local people ii. Promote employment led growth in the borough 5) Theme 5 - Work Towards a Low Carbon Economy i. Growing a low carbon economy	the JCS can contribute to economic development and strengthen the economy of the area. The SA Framework will include economic objectives.

J) Health & Equalities

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
The EU Directive on Environmental Noise (COM(2000)468) 2002	To avoid, prevent or limit the effects, including annoyance, caused by exposure to environmental noise.	• Create noise maps • Prepare action plans • Inform and consult residents	The SA Framework should include a decision aiding question on noise pollution and ensure the JCS would not create noise issues.
National			
The Equality Act 2010	The act replaced previous anti-discrimination laws with a single act to make the law simpler and to remove inconsistencies. The act also strengthened protection in some situations. The Equality Act sets out the different ways in which it is unlawful to treat someone, such as direct and indirect discrimination, harassment, victimisation and failing to make a reasonable adjustment for a disabled person. The act prohibits unfair treatment in the workplace, when providing goods, facilities and services, when exercising public functions, in the disposal and management of premises, in education and by associations (such as private clubs).	The act covers nine protected characteristics, which cannot be used as a reason to treat people unfairly. Every person has one or more of the protected characteristics, so the act protects everyone against unfair treatment. The protected characteristics are: -age -disability -gender reassignment -marriage and civil partnership -pregnancy and maternity -race -religion or belief -sex -sexual orientation	The SA Framework includes an objective on reducing inequalities. A new decision-aiding question is proposed to more specifically address the requirements of the Equality Act.
The Health Profile of England, 2006 Draft Guidance On Health In SEA, 2007	Guidance on how to integrate health into SEA. The guidance is intended to help authorities assess the health effects of their plans and programmes more effectively and is based on current good practice.	• Encourages consultation with a health body in addition to 3 statutory consultees • SEA is a major opportunity to ensure that future policy encourages healthy lifestyles • SEA can ensure that policies damaging to healthy lifestyles are minimised and opportunities maximised.	The JCS should look to incorporate policies that promote healthy lifestyles. Health organisations will be given an opportunity to engage with policy preparation and the SA process. The SA Framework includes a health

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		Health organisations should be effectively engaged in SEA	objective and decision aiding questions based on local health indicators. The PCT will be consulted on the Scoping Report.
Healthy lives, healthy people: our strategy for public health in England	This White Paper sets out the Government's long-term vision for the future of public health in England. The aim is to create a 'wellness' service (Public Health England) and to strengthen both national and local leadership.	The goal is a public health service that achieves excellent results, unleashing innovation and liberating professional leadership. This White Paper builds on Equity and Excellence: Liberating the NHS to set out the overall principles and framework for making this happen.	The JCS should consider both healthcare and preventative health. Policies should seek to encourage healthy lifestyles by promoting walking, cycling and access to open space, sports and leisure facilities.
Diversity and Equality in Planning – A good practice guide 2005	The Government is committed to changing the culture of planning to make it more responsive, positive and pro-active. Diversity and equality are at the very heart of this new agenda, helping define sustainable and inclusive communities. Community involvement is one of the key themes underpinning the Government's planning reforms. The Guide illustrates an inclusive approach to community consultation.	The aim of this Guide is to help local planning authorities address diversity and equality issues in their policies and procedures.	Consideration should be given to this guidance in the development of the JCS.
Regional/sub-regional			
Gloucestershire Health and wellbeing Strategy 2012 – 2032 – Fit For The Future	The aspiration of this strategy is to continue to improve the quality of life for everyone in Gloucestershire within available resources. This is why the strategy spans 20 years, and it aims to be implemented through three-year action plans that are refreshed annually. This will enable measurement of progress in the short, medium and longer term.	Uses the life-course approach: - Starting well – with a focus on pregnancy and early years to give every child the best start in life - Developing Well – a focus on children and young people maximising their capabilities and control over their own lives - Living and Working Well – a focus on promoting healthy lifestyles; equitable access to ill-health preventative services; healthy and sustainable	The JCS should consider promoting healthy lifestyles and reducing health inequalities. The SA Framework includes a health objective and includes decision aiding questions relating to specific health issues and inequalities within the JCS area.

		physical environments; building social networks and communities and access to good employment opportunities ■ Ageing Well – promoting independence, physical and mental health and wellbeing post-retirement. Under each of the above headings it sets aspirations to achieve in the Gloucestershire area.	
YOUR HEALTH, YOUR CARE Our five year vision for Health and Social Care	Over the next five years Your Health, Your Care seeks to support the aspiration of the Health and Wellbeing strategy by putting in place the building blocks to ensure that we can continue to improve the quality of life for everyone in Gloucestershire.	The vision for Gloucestershire Health Community is to have: ■ Joined up care for the people of Gloucestershire ■ People empowered to take more control over their own care ■ Mainstream services that are accessible by all vulnerable people, wherever they may live ■ Enhanced outcomes for the population ■ Improved use of resources	The JCS should consider promoting healthy lifestyles and reducing health inequalities. The SA Framework includes a health objective and includes decision aiding questions relating to specific health issues and inequalities within the JCS area.
Gloucestershire Children and Young People's Partnership Plan 2012-15 (refreshed version: 2013-14)	'To ensure our children and young people thrive and reach their full potential; providing appropriate support for those families who need it most'	Our vulnerable children, young people and families have an entitlement to Early Help; Targeted Interventions and for some, Intensive Intervention to: ■ Enjoy the best start in life ■ Maximize their capabilities and have control over their own lives ■ Be safe from injury, exploitation and harm	The JCS should consider the needs of all including those of vulnerable children, young people and families. The SA Framework includes a health objective and includes decision aiding questions relating to specific health issues and inequalities within the JCS area.

		Work well together to provide right and timely effective intervention for vulnerable children and families as early as possible	

K) Transport and Accessibility

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
International			
European Commission White Paper on the European Transport Policy 2001	This paper describes what has been achieved so far both at the Union and the Member State levels and what should be done in the near future.	The principal measures suggested in the White Paper include: - Revitalising the railways; - Improving quality in the road transport sector; - Striking a balance between growth in air; - Transport and the environment; - Turning inter-modality into reality; - Improving road safety; - Adopting a policy on effective charging for transport; - Recognising the rights and obligations of users; - Developing high-quality urban transport; and - Developing medium and long-term environmental objectives for a sustainable transport system.	The JCS should consider including measures, as appropriate, to improve transport in the area.
National			
Transport 2010; the Government's Ten Year Transport Plan, 2000-2010	Aims to deliver the Governments priorities with regard to transport. Sets out transport funding between 2001/02 and 2011/12.	- Reduced congestion - Better integration between modes of transport - Improved choice, reliability, and safety throughout all forms of public transport	The JCS should set the framework for future development that minimises the need to travel The SA Framework includes an objective on transport modes.
Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon	TaSTS sets a new approach to strategic transport planning for the period beyond 2014 that would implement the recommendations	Objectives: -Deliver quantified reductions in greenhouse gas emissions within cities and regional networks, taking account of cross-network policy measures.	The JCS should set the framework for future development that minimises the need to travel.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
World (DfT 2007) and Delivering a Sustainable Transport System (DfT 2008)	of the Eddington transport study and reflect the Stern Review of the economics of climate change. Delivering a Sustainable Transport System' follows on from TaSTS.	-Ensure local transport networks are resistant and adaptable to shocks and impacts such as adverse weather, accidents, terrorist attacks and impacts of climate change. - Enhance social inclusion and the regeneration of deprived or remote areas by enabling disadvantaged people to connect with employment opportunities, key local services, social networks and goods through improving accessibility, availability, affordability and acceptability. -Reduce the risk of death, security or injury due to transport accidents. -Reduce social and economic costs of transport to public health, including air quality impacts. -Improve the health of individuals by encouraging and enabling more physically active travel. -Manage transport-related noise in a way that is consistent with the emerging national noise strategy and other wider Government goals -Minimise the impacts of transport on the natural environment, heritage and landscape and seek solutions that deliver long-term environmental benefits.	
National Planning Policy Framework (NPPF) 2012	The NPPF states that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.	Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas. The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user.	The National Planning Policy Framework must be taken into account in the preparation of the JCS.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
		All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether: ■ the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure; ■ safe and suitable access to the site can be achieved for all people; and ■ improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.	
Regional/Sub regional			
Gloucestershire Local Transport Plan 3 Gloucestershire County Council	The Local Transport Plan for Gloucestershire (LTP3) sets out the transport strategy for the County from 2011 to 2026.	The vision for transport in the future is: "Providing a safe and sustainable transport network within Gloucestershire" where safe means a transport network that people feel safe and secure using and sustainable means a transport network that is both environmentally and financially sustainable.	The JCS will have to consider the transport implications of future development and will need to show that required infrastructure will be in place. The SA Framework includes an objective on transport.
Gloucester and Cheltenham Connectivity Study Draft Phase 1 Report 2010	The Study will develop options and identify packages of schemes and interventions that maximise the performance of the strategic national corridor and the local transport network. This will enable the transport system to best support economic regeneration and planned housing growth, through providing access to jobs and services.	Interventions: Climate change ■ Encouraging a shift to more sustainable modes ■ Reducing the need to travel ■ Encouraging use of: clean fuels, increased engine efficiency and electric vehicles ■ Establish a Travel Champion Team ■ Demand Management particularly in the main urban centres including workplace parking levy and low emission zone Competitiveness and Growth ■ Enabling sustainable growth (employment and housing)	The JCS will need to consider the interventions listed and take account them in policy development where appropriate.

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		▪ Improve journey speeds and journey time reliability on the strategic network and on key radials by encouraging the use of non-car modes for more local trips ▪ Seek to improve rail connections to the major urban areas outside the study area particularly London ▪ Schemes to improve resilience and to lessen the impact of extreme weather conditions ▪ Improve reliability of journey times for freight movements to, from and through the study area Equality of Opportunity ▪ Step change required in the quality of bus and cycle provision in the study area Quality of Life and Natural Environment ▪ Schemes to tackle severance and air quality issues to unlock the heritage potential of the area ▪ Ensure the Areas of Outstanding Natural Beauty aren't eroded and help maintain the rural characteristic of the study area Safety, Security and Health ▪ Focus on safety issues on the strategic network particularly for freight movements on the M5 ▪ Schemes to tackle air quality issues predominantly in the urban areas	

Appendix V: SA Consultation Representations to Joint Core Strategy Gloucester, Cheltenham and Tewkesbury: Initial SA Summary Report December 2011

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
Environment Agency			
February 2012		<u>SA/SEA</u> We have commented on the scope/framework of the SA/SEA previously. We have not added significantly to our previous comments at this stage (save for the comment on WFD and RBMPs), as clearly the points raised in this letter regarding evidence base gaps and improvements to the emerging JCS will need to be resolved and tested using the SA/SEA as a tool. We may therefore make further comments on SA/SEA at a later point.	Evidence base gaps identified have been addressed. The updated baseline can be found in Appendix IV Baseline & Plans/Programmes Review Updates 2013.
Natural England			
-		No further comments received on the SA at this Stage.	Noted
English Heritage			
-		No further comments received on the SA at this Stage.	Noted
Penny Steer			
December 2011		In preparation for these comments I have referred to the two documents available at a local library (the Initial Sustainability Appraisal Summary Report December 2011 and the Response Report on Consultation to October 2011). I have received the Summary Guide by post and looked at the website. The information available has only strengthened impression to conviction that this planning strategy, like its predecessors, is based largely on stealth and greed. For private individuals trying to assess plans for their particular area, the documentation (summary included) is unmanageable an off-putting. There is too much paper, too much narrative and too much self-congratulatory box-ticking. As a resident of Southam, my accusation of stealth stems primarily from the fact that the plans for Southam and Prestbury (full	Noted. The final SA Report will include a Non-Technical Summary with technical details organised in appendices. These are a necessary part of the SA process in order to demonstrate a systematic and integrated approach that complies with legislative and policy requirements.

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		document online Section 12) are not mentioned in the Summary Guide nor, as far as I could see, in either of the two documents at the library. I would have welcomed an online facility for a paragraph of general comment (as offered by the Summary Guide). I am sure that, like myself, many private individuals will have mainly specific, local concerns. To ask us to complete a 13-page questionnaire frankly discourages participation. I accept that planning is inevitable and desirable. However, nothing about the current approach to planning at either government or local level gives me confidence that development will be managed properly either generally or specifically. 'Properly' to me means that: a. in the first place vacant properties would be identified and developed; b. secondly, brownfield sites would be assessed and developed; c. the infrastructure implications of development would be considered and costed hand-in-hand with plans for any increased housing provision (this is not the impression given in the current documentation); d. use of the green belt should not be regarded as inevitable. It should be seen as absolutely the final resort when all other options have been exhausted. The current documentation provides no reassurance that there will be coordinated, objective, joined-up thinking on any of the above. The inclusion of Southam and Prestbury (section 12.2) as areas which provide 'the main focus for new homes, jobs, retail, leisure, education and cultural development' is a good illustration of 4c. The stated premise for this decision - i.e. that 'they make best use of existing principal infrastructure networks. They represent the most sustainable locations for development.' - is simply untrue. Prestbury's infrastructure is rudimentary and small-scale and already under stress. Southam's is virtually non-existent. The planning implications and cost of upgrading the infrastructure to support the demands and needs of significant housing development receive no mention nor is any consideration given to the additional environmental impact of an enhanced infrastructure.	Noted.

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
Mr & Mrs KM Keates			
December 2011		Clause 3 of policy states: 'The site has reasonable access to local services and facilities, and/or public transport; or where it can be demonstrated that the provision of housing for local people will assist the sustainability of the settlement area'. This clause seems odd. Does it mean that reasonable access to local services and facilities etc. will not be required when the second part of the clause applies? How can a rural development assist sustainability without reasonable access to facilities? This seems ambiguous and perhaps some more thought needs to be given to the wording. With regard to the second part of the policy on cross subsidy, every developer will take this route. It could encourage development of exceptions sites instead of allocated sites in rural areas.	The SA Framework that forms the basis for assessment includes Objective & Decision –Aiding Questions relating to accessibility to services, facilities and green space.
Nicholas Brown			
December 2011		If this policy is not to become an opportunity for developers to ride rough-shod over local people the sustainability test must be rigorously applied.	Noted. The Sustainability Appraisal has been applied in an iterative and ongoing way since early stages of JCS preparation. It has been applied in accordance with legislative requirements and good practice.

SA Consultation Representations to Joint Core Strategy Gloucester, Cheltenham and Tewkesbury: Initial SA Summary Report December 2011 (Not presented in the SA Report 2013)

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
RPS - Representations on Behalf Of Leckhampton Consortium: Miller Strategic Land, Bovis Homes (South West), And M & A Holdings Limited			
February 2012	Page 23 of 32+	The Sustainability Appraisal on page 23 of 32 includes a summary assessment of Area C6 relating the large tract of land south of Cheltenham between the town and Brockworth, north west of the Cotswold AONB. 4.2 RPS concurs with the appraisal findings that: • land at Leckhampton is particularly well connected to the urban centre; • flood is not a constraint within this broad location area; • the eastern parts, including the Leckhampton area, are close to a range of good community facilities, services and would be expected to have a positive contribution in regards helping to sustain a vibrant town centre; and • land to the south-west of Leckhampton bounded to the north-west by the A46 Shurdington Road, to the west by Farm Lane, the 'north'* by Church Road and to the east by public greenspace and allotments should be taken forward for further appraisal [* RPS observes that this is an error and should refer to 'south'] 4.3 There are significant omissions in the assessment. There should be recognition that land at Leckhampton is not constrained by Green Belt and land to the west of Farm Lane is an adopted Local Plan Allocation for 350 new homes. 4.4 Green Belt status needs to be addressed through a fundamental review. However, the impact of development on coalescence and sprawl are key considerations for a sustainability appraisal in RPS's view, as these are matters which may not be readily mitigated. It is noted that Table 2 includes Green Belt within the Biodiversity, Natural Environment and Resources and the Green Space Key Sustainability Issues but this is not taken forward into the SEA topics	Noted. The SA in 2011 was an initial appraisal appropriate to the consideration of Broad Locations. The Broad Locations were subject to constraints and opportunities analysis and fresh independent SA with updated and more detailed evidence in 2013.

Section of SA Report		Consultee Comments/Responses	Enfusion Comments
		or sustainability objective setting. 4.5 The Sustainability Appraisal recognises that the C6 Leckhampton land offers good scope to provide green infrastructure and linkages to the wider countryside in mitigation for potential adverse impacts on the landscape and natural environment in this edge of urban area location. In the context of Historic Environment, the assessment refers to the proposed scale of development potentially having an adverse impact on the moat and fishpond Scheduled Ancient Monument (SAM) in the south of the Leckhampton White Land area. However, at the reduced level of 950 dwellings, rather than 1,300 dwellings, this potential adverse impact would be avoided with a substantial open buffer retained between new development and the SAM. The Sustainability Appraisal acknowledges the merit of a reduced development in this context	
RPS - Representations on Behalf of North Tewkesbury Land Consortium and J& L N Pitcher			
February 2012	General	The current Sustainability Appraisal (SA), which is also currently being consulted upon, includes a summary of the broad locations for development, including Land at Mitton Area T1a, and The Mythe Area T6a. It is not clear who is the author of the document and it has been assumed that it is a different author than the Broad Locations Report which draws different conclusions, particularly on the land at Mitton where the latter site is identified as suitable for some 1,000 dwellings and between 5 and 10 ha of employment land (as identified above). 4.2 RPS strongly challenges the conclusions of the SA document on both the Mitton and The Mythe sites. 4.3 These are both predominantly greenfield sites which are outside the Green Belt. They adjoin the Tewkesbury urban area. They are outside areas of Flood Zones 2 and 3 in respect of proposed development areas and land for surface water attenuation. Neither site has any ecological designation. The setting of listed buildings can readily be respected. The Tewkesbury Conservation Area covers part of The Mythe land. However, the Tewkesbury	Noted. The SA in 2011 was an initial appraisal appropriate to the consideration of Broad Locations. Some of the Broad Locations were progressed and some were discounted with reasons provided in Table 6.3 of the 2013 SA Report. The progressed Broad Locations were subject to constraints and opportunities analysis, and fresh independent SA with updated

Section of SA Report	Consultee Comments/Responses	Enfusion Comments
	Town Centre Masterplan document includes a new car park within the Conservation Area which forms part of the development proposals for the site. The sites are the closest peripheral sites to the town centre of Tewkesbury. The Mythe land will provide a new riverside park. The sites jointly will fund the Tewkesbury Northern Relief Road proposal between Morrison's superstore and the Bredon Road. The sites will jointly fund the replacement of the existing constricted Bredon Road culverts over the Carrant Brook with a new clear span. Land at The Mythe will facilitate the necessary flood alleviation scheme for the Severn Trent Waterworks south of The Mythe. The sites will jointly provide a new primary school and new local employment areas. The development proposals include the introduction of improved public transport which will be facilitated by their linear configuration which optimises access to services from new properties. 4.4 The location of development at Mitton and Mythe Farm/Bradley's Farm can be suitably accommodated in the landscape. The Mitton site adjoins the existing Mitton development and complements the Cowfield Farm employment area to the east. The Mitton development represents a logical and well contained area between the Bredon Road ridge and the existing urban area. The Mythe site adjoins the existing settled area straddling the A38 on the hill top. The proposed development is low density and accompanied by extensive new Green Infrastructure which will allow for new landscaping and open spaces throughout the development. Area T1a - Land at Mitton, East of Bredon Road 4.5 In relation to Area T1a, the SA states that the only landscape constraint is flooding along the Carrant Brook to the east and the southernmost section of the site. RPS has acknowledged this in preliminary assessments for development of the site, and has taken this into account in the Concept Masterplan, shown at Appendix 2. 4.6 The SA considers that the southern part of the site up to Mitton Lodge is worth further consideration, but discounts the northern part of the site as	and more detailed evidence in 2013.

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	being “too remote”, stating that development would cause “open sprawl northwards into the open countryside”. It is not clear what is the basis for this conclusion. RPS disagrees with the statement on sprawl into open countryside. The suggestion that development should not extend north of Mitton Lodge on the basis there is a logical containing boundary is fundamentally flawed. The clear boundaries to potential development which would limit any contention over sprawl are Bredon Road and Hardwick Bank Road. The employment area of Cowfield Farm to the west of the motorway and the residential area of Northway to the east of the Motorway both extend north of Mitton Lodge and up to Hardwick Bank Road. 4.8 RPS's landscape assessment has concluded that the north western fields in the assessed area of T1a should not be included in the development area given the topography and the location of the ridgeline to the east of Bredon Road at this point. 4.9 In respect of remoteness, RPS simply refutes the contention based on distance measurements by direct routes to Tewkesbury Town Centre. The whole of the Mitton land is closer to Tewkesbury town centre than the nearest part of the DCSC site which has been identified as suitable for residential development in the assessment (without information on contamination remediation costs, site availability, site clearance costs and apparent consideration of alternative uses such as strategic employment. It is difficult to understand how development at Northway (existing and proposed) can be considered not to be too remote when the northern part of the Mitton land has been described as being "too remote". 4.10 Further, a partial development south of Mitton Lodge would effectively preclude many advantages that would accrue from comprehensive development of the area. These advantages include the off-site infrastructure improvements that have been identified as well as the new primary school,	

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		open spaces, expansive surface water attenuation areas and local employment and shop and potential for health care and retirement/care facilities. 4.11 The SA states that construction of the Tewkesbury Northern Relief Road is required to bring the site forward for development. The delivery of this relief road is proposed as part of the Mitton and Mythe developments. This therefore should not be considered as a constraint to development, but rather as an opportunity (especially as delivery of that road is a key element of the emerging Tewkesbury Town Centre Masterplan). 4.12 The SA states that Area T1a is not well served by a bus route. As the Masterplan shows, a bus route through the site is to be provided (the route shown on the plan), which is to be an extension of the existing bus route which would be diverted through the site. Therefore, this is not a constraint for development. The result can be expected to be better bus services in the Mitton area than currently exist. 4.13 As the proposed development would be mixed use including a primary school and local shop, as well as new light industry/business units and local scale office space, it offers genuine sustainable development credentials through the enhancement of the range of facilities available in the area. There is also the potential for additional healthcare facilities to be included in the development if required. 4.14 The site, as with The Mythe land, is one of the two closest peripheral sites to Tewkesbury town centre. It also has walking/cycling accessibility to other facilities such as the hospital and secondary school and well as to the employment centres east of the town and railway station at Northway via Hardwick Bank Road. 4.15 In summary, the Mitton land is well contained by existing development, topography and road infrastructure, and its development would provide an appropriate extension to the existing urban area without unacceptably encroaching on to the countryside in meeting a substantial identified	

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		housing requirement. The site is not highly visible from the public realm due to the adjacent development and landform and is only viewed in the context of existing built up area. All of the purported weaknesses of the wider Mitton land can be addressed through a well designed and implemented proposal. There are no reasons for rejecting the site on sustainable development grounds given the scale of housing need that has been identified. As demonstrated in the Masterplan at Appendix 2, the site can be appropriately developed to benefit the town. As the development would also contribute towards delivery of the relief road, and Bredon Road bridge improvements to ease flooding in the area, the site should be considered by the Local Planning Authorities as a suitable broad location site. Area T6a - Land at The Mythe 4.16 Area T6a has been discounted in the draft SA as being considered 'unsustainable' for a broad location development area. This conclusion is refuted as reflected by the Tewksbury Borough SHLAA which uniquely identified the land as suitable, available and deliverable as a peripheral greenfield site within the 5 year period to 2015. 4.17 The SA summary of the site states that it is within a Landscape Protection Zone. It also indicates that the areas where the land floods adjacent to the river are important biodiversity sites. Clearly, landscape impact is a factor which has been afforded significant weight by the authors of the SA and merits particular comment. 4.18 The Indicative Land Use Plan for The Mythe at Appendix 2 incorporates very extensive areas of green infrastructure including substantial areas of new structural planting. The proposals are for generally low density housing throughout and very low density housing on the edges of the development. A central village green area is proposed as well as a network of linear green routes which will provide convenient, safe and attractive pedestrian and cycle paths through the development and linking to the town centre via the new public riverside park adjacent to the River Avon. The	

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	proposal is landscape led in this respect while seeking to deliver key aspects of the Tewkesbury Town Centre Masterplan including a new gateway car park on the A38, the riverside park and infrastructure improvements in the town. 4.19 The extensive Green Infrastructure also offers the opportunity for wildlife areas to be established and maintained as part of the wider proposals in addition to the recreational and amenity areas that will be created. 4.20 The SA states that Area T6a is relatively inaccessible to J9 of the M5 motorway. RPS does not see this as a disadvantage but rather as a sustainability benefit. New residents and workers on The Mythe site will have excellent pedestrian, cycle and bus access to Tewkesbury Town Centre and will be far less likely to choose to travel to North West Cheltenham for town centre services than potential new residents at Ashchurch, east of the Motorway. However, when access to the principal road network is required for occupiers of The Mythe development, the A38 links directly without passing through the centre of any settlements to M50 Junction 1, avoiding the need for through traffic in Tewkesbury, particularly for trips to the north. The location to the north west of the town is regarded by RPS as a sustainability advantage. 4.21 The SA also states that any development at The Mythe would require the construction of the Tewkesbury Northern Relief Road (TNRR). RPS accepts that, in conjunction with the development proposal at Mitton, the combined developments should appropriately contribute towards the construction of the TNRR between Morrison's superstore and the Bredon Road. Rather than being a constraint against the development the completion of this long planned road link is a positive benefit from allocating land at The Mythe and at Mitton. 4.22 The whole of The Mythe site lies within 2km from the town centre, including a wide range of retail and other services. Primary school provision is available at Mitton Manor and a further new primary school is proposed on	

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		the Mitton site towards which development at The Mythe would contribute. The Mythe land is within an appropriate distance of Tewkesbury's secondary school, to which the TNRR scheme will provide more direct access than currently is available. 4.23 The proposed housing area would be linked to the town by a substantial new riverside park and segregated pedestrian and cycle routes. The new properties would be closer to the town centre than Wheatpieces which is separated from the town by floodplains and would be adjoining the existing Mythe Farm Business Centre and existing residential properties at The Mythe which occupy the hill top. The site is clearly an appropriate location for development which is very close to and especially well linked to the town centre. As such, it is contended that this site would provide considerably better support to the town centre than the sites at Ashchurch or Northway, which being east of the M5 motorway and further from the town centre could not be expected to contribute to the enhancement of the town centre. 4.24 In addition, new footpaths and cycleways are proposed for the development, and as required in the TTCM for this part of Tewkesbury, a new out of town car park would be provided at the southern part of the site which would ease parking along the High Street and allow planned environmental improvements. Development of the site would also enable removal of the railway embankment in conjunction with Severn Trent, which would help the flow of water in the area reducing flooding problems within Tewkesbury to the north. 4.25 Development of the site would therefore provide additional benefits to Tewkesbury, and land at The Mythe should be included as a strategic allocation for release in Phase 1 of the GCT-JCS and not be discounted as a suitable extension site.	

Consultation Responses to Draft Joint Core Strategy Gloucester, Cheltenham and Tewkesbury: SA Report October 2013

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
ID No. 3268129			
Jean Ringrose			
	Baseline	Concern re housing proposed in Cheltenham. SHMA & SA use 2011 census data; concern re use of interim ONS projection.	Noted.
Natural England			
-		No further comments received on the SA at this Stage.	Noted.
English Heritage			
-		No further comments received on the SA at this Stage.	Noted.
ID No. C S Ringrose			
	Paragraph 3.47	b) Sustainability Appraisal Report, Enfusion, Oct 2013. Para 3.47 Key Environmental Sustainability issues....."There are significant sustainability risks to accommodating the RSS' housing figures, which could be ameliorated by adopting Code Level 4 as a minimum standard in new development." Why are RSS Housing figures still being used by the JCS?	Para 3.47 reports the key sustainability issues identified from the 2008 SA Scoping process the RSS derived the housing figures. The key sustainability issues were reviewed during 2013 with updated evidence (including the NPPF & locally derived housing requirements) and found to be still relevant such that the SA Framework of objectives and decision-aiding questions is still applicable. "RSS" has been removed to avoid confusion; the environmental sustainability issue for accommodating

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			housing remains and the wording is now "...to accommodating housing figures..."
ID No.			
Environment Agency			
	Baseline	Evidence base - It is important that the WFD and the Severn RBMP form part of the wider evidence base for the plan, and are part of the SA/SEA process. We have been involved with the work on the SA/SEA previously and advised on the Framework and targets and indicators. However it is some time ago that this took place, and we believe the RBMPs may have been published since then, so the SA/SEA would need updating to reflect this. We welcome that the WFD is listed in Appendix 1 of the SEA/SA as a relevant plan/policy/programme, however the RBMP is currently missing from the SA/SEA. As indicated above we consider the environmental theme of water quality protection and enhancement (ground and surface water) is missing from the strategic objectives. Accordingly we do not feel the SEA is highlighting this issue sufficiently and it has not therefore fed into the Plan sufficiently.	Noted. The WFD and Severn RBMP were both considered in the SA baseline/ Plan and Programme review where the implications for both the SA/SEA and JCS were outlined. This was located in Appendix IV of the SA Report (October 2013). The SA Framework developed in 2009 included an objective relating to water quality in the form of SA Objective 5 Natural Environment and Resources: Quality (Protect and improve the quality of natural resources including soil, water and landscape) as well as a decision aiding question to 'improve the quality of water (both ground and river).' It also included a number of indicators relating to the water quality including: Percentage river length assessed as i) good and ii) excellent biological quality; Percentage river length assessed as i) good and ii) excellent chemical quality. The baseline information and PP Review were updated in 2010-11 and during 2013 (which included consideration of the WFD

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			and RBMP) and it was found that the issues for the JCS area remained the same and the SA Framework was still relevant and thus was retained for continuity of appraisal (paragraph 2.9).
ID No. 3314913 Anne Griffiths			
	Initial SA Report 2011	Broad Location C3 Land NW of Cheltenham – inaccuracies re river – flooding & landfill drainage; historic listings; highways & transport; proximity to AQMA	Noted. The SA in 2011 was an initial appraisal. The Broad Locations were subject to constraints and opportunities analysis and fresh independent SA with updated and more detailed evidence in 2013.
ID No. 3322721 Mrs C Ground, LMA Planning			
	Housing provision and Policy SP1	The Sustainability Appraisal accompanying the consultation JCS identifies that a housing provision of 33,200 dwellings over the JCS area will provide significant positive effects on the Sustainability Appraisal Objectives relating to the economy and housing. Other minor positive effects will also be noted against the remainder of the Sustainability Appraisal Objectives. It should be noted that the Draft JCS Sustainability Appraisal does not assess the impact of a higher level of housing than proposed within emerging Policy SP1. In that regard, we note the conclusions of the previous Sustainability Appraisal, which identified that the most sustainable option for housing provision was 36,900 dwellings across the JCS area between 2011 and 2031, although there were a number of benefits identified with an higher provision again (40,500 dwellings), which included: It would help	Noted. The SA is required to appraise “reasonable alternatives” ie realistic and deliverable, taking into account the aims and context of the plan. SA is an iterative and ongoing process that is refreshed with updated evidence as plan-making develops. The 2011 Initial SA appraised scenarios for housing provision informed by data at that time. A most likely sustainable option was identified from comparative

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		retain some key sectors of the workforce; The level of residential development proposed would support the economic potential of the area to a greater degree; It is the best scenario for addressing the need for affordable homes; and It would provide a greater opportunity to address housing need and demand. This analysis would support future iterations of the JCS providing a higher housing provision than is currently proposed in Policy SP 1 of the emerging Plan.	assessment. The 2013 SA appraised considered the Objectively Assessed Need that was identified by updated and new studies at that time.
	Policy C4 – Gypsy, Traveller and Travelling Showpeople (paragraph 7.112)	This emerging Policy was considered through the Sustainability Appraisal process (October 2013) which outlines that it would have minor positive effects on the Sustainability Appraisal Objectives relating to housing and equality. The effects on the majority of the other objectives are considered to be either neutral or unknown (para. 7.112 refers). 136. The Sustainability Appraisal suggests that the positive effects on the housing objective could be made more certain if new gypsy and traveller sites were required to be provided as part of the new strategic allocations rather than just requiring that provision should be considered. This is considered to be a significant error in the approach and the recommendation was made without any assessment of the suitability and desirability of conventional housing sites for/to gypsy and travellers.	Noted. Recommendation was made following review of the Gloucestershire County Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (October 2013) which stated that 'Policies should be provided within local plans to allocate sites within urban extensions.'
ID No. 3373153 Julie Shirley, Brockworth Parish Council			
1	Strategic options for distributing growth	The Sustainability Appraisal (SA) assesses three options for distributing development - 'Urban Focus', 'Rural Dispersal' and 'Significant Expansion New Settlement'. Table 7.1 of the SA summarises the split of residential development under each option. However, it is impossible to ascertain whether any form of hybrid option might provide a better solution than the stark options proposed. In the rural areas, growth of 5% under the 'Urban Focus' scenario and 68% under the 'Rural Dispersal' was tested. The difference in terms of actual dwelling numbers is 1,660 dwellings versus 22,576 dwellings. This is not just an extreme alternative but reflects the fact that the 'Rural Dispersal' scenario could never be	Noted.

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		considered a realistic option, as this would have had to be delivered in just two rural service centres and 15 service villages. An alternative sensitivity test of 25% rural growth should have been tested. At 8,300 dwellings, this would have involved some significant growth of many of the rural settlements, but could have been an option that would have represented a credible alternative to the 'Urban Focus'. It would also, more pertinently, have reduced the potential reliance on green belt land. To not test credible options in the SA means that the spatial strategy cannot be justified against reasonable alternatives.	
2	Options around Tewkesbury	It is not clear as to what justification has been made for the limited number and scale of urban extensions around the Tewkesbury urban area. This is the one principal settlement in the JCS area that is not subject to the restriction of any green belt designation. The SA undertaken in December 2011 to inform the consultation entitled 'Developing the Preferred Option' made clear that a number of the sites that were assessed around Tewkesbury were worthy of further consideration.	The reasons for progressing/not progressing options considered by the 2011 SA were presented in Table 6.3 of the 2013 SA Report.
ID No. 3555201 RPS Planning & Development on behalf of J&LN Pitcher			
1	SA Initial Report Broad Location T6a Baseline Evidence: Flooding	Flooding Evidence. RPS notes within the Initial SA report undertaken in 2011 for the Developing the Preferred Option document, the area promoted by RPS (Broad Location reference T6a) was considered subject to flood risk and that this is one of the principal reasons for the site not being considered suitable. However RPS has set out that the site is not subject to flood risk and the JCS authorities' own Strategic Flood Risk Assessment (SFRA) maps demonstrate this alongside the Environment Agency Flood Risk evidence. RPS has also liaised with the Environment Agency as well as Tewkesbury Borough and Wychavon District Council engineers and established that with an appropriate surface water drainage strategy, incorporating SuDS, the development of The Mythe could be designed in such a way as to not be at flood risk and not generate any significant	The SA in 2011 was an initial appraisal appropriate to the consideration of Broad Locations. Some of the Broad Locations were progressed and some were discounted with reasons provided in Table 6.3 of the 2013 SA Report. The progressed Broad Locations were subject to constraints and opportunities analysis, and fresh independent SA with

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		additional flood risk to the wider community of Tewkesbury. On this basis, it is not considered that the evidence on flood risk stands. Under the requirements of evaluating sites with Strategic Environmental Assessment it is a requirement that the local authorities do not carry forward previous assessments unless they can demonstrate that the previous assessments and evidence base upon which they were based still holds true. In this case, it is clear that the Council's own SFRA maps demonstrate that the site is not subject to flooding and evidence has been established to demonstrate that the site is suitable in respect of flooding.	updated and more detailed evidence in 2013. Broad Location T6a The Mythe was not progressed any further during 2013 as it was not considered to be in accordance with the overall development Strategy for an urban focus; not considered to be a reasonable alternative and thus not subject to SA at this time.
2	SA Initial Report Broad Location T6a Baseline Evidence: Landscape	Landscape Evidence. RPS is aware that within the 2011 SA Report and Strategic Housing Land Availability Assessment (SHLAA), the JCS authorities referred to landscape policy constraints from existing development plans and discounted sites on this basis, one of which was land at The Mythe in Tewkesbury. RPS objected to the use of local landscape designations in the context of national policy at the time and the Government Guidance on SHLAA that sets out that local restrictive policies should not be used. It is, however, now noted that since the 2011 Developing the Preferred Options Document, a further JCS Landscape Assessment has been undertaken and published. However, no evidence has been published on how this has been used within the decision making process in respect of sites, particularly land at The Mythe. RPS is aware that the information has been used within the Tewkesbury SHLAA process but it is not evident from public documents on how this evidence has been used in the SA process and appraisal of the land at the Mythe. Given that the JCS has published more up to date evidence on landscape and this appears to have been used to maintain the discounting of sites such as land at the Mythe, this information should be contained within published documents available for public scrutiny. However at present the land at the Mythe does not appear within the SA publication other than a reiteration of the previous 2011 work (which	As above.

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		is evidenced as incorrect in the most part), nor does it appear in any reference in the JCS document or to the use of the landscape evidence in the SA process. In this context RPS objects to the use of the Landscape Study and the robustness of it until independently examined.	
3	Opportunities land at the Mythe.	A significant amount of evidence has been collated in respect of the land at the Mythe that demonstrates that the site is entirely suitable for development, particularly in respect of flooding and can be accommodated satisfactorily on the north-west edge of Tewkesbury, close to the town centre and without unacceptable harm to important views to the Malvern Hills. It also has the capacity to assist with much needed affordable housing and to deliver appropriate physical, social and green infrastructure. However, most significantly it has the ability to contribute to the Tewkesbury Northern Relief Road in combination with Land at Mitton. RPS therefore expect that land at Mythe should be appropriately considered within the emerging development plan, fully appraised within the SA/SEA process and subject to public consultation as a viable option for accommodating development at Tewkesbury Town. In this context, RPS also expects that should the authorities reach any decision on this site, this should also be made publically available for scrutiny in advance of a Pre-Submission Draft Plan. To date it has not done so.	
ID No 5894433 Helen Wells, Save the Countryside			
1	A5 NW Cheltenham Urban Extension – Inconsistent & contradictory evidence – traffic, pollution	No need to breach Cheltenham / Gloucester Green Belt (Strategic Objective 4 bullet 4, Policy SP1 para 3.20, Policy SP3 bullet 6, Policy S5). The Draft Sustainability (Integrated) Appraisal Report noted cumulative negative effects on landscape and through loss of Green Belt and Greenfield land. inconsistent and contradictory 'evidence base' relating to this site (even down to the confusing alternative descriptions and numbering of the site - NWC, C3 (which refers to 2 different land divisions), C17, E, Policy A5, not identified on Proposals Plan . . .). Some of the conflicting	Noted. The name changes to the site progressed as preferred allocations will be made clear in Table 7.2 of the Pre-Submission SA Report. The SA in 2011 was an initial appraisal appropriate to the consideration of Broad Locations. The Broad Locations were subject to constraints and opportunities

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	health inequalities	reports: Broad Locations Report, Draft Sustainability (Integrated) Appraisal Report, Strategic Allocations Report, Entec Urban Extension Boundary Study. Concern re: ...the noisy and polluting A4019 traffic with air quality problems, (the whole of Cheltenham is subject to Air Quality Management, M5 Junction 10 for instance exceeding recommended limits); ...noisy main line railway; ...active long-term smelly and noisy landfill Sites including Wingmoor Farm toxic waste facility at north east of the site and for which no JCS Health Assessment evidence document has been produced. The 2011 Initial Sustainability Appraisal Report had already worked out that there was limited capacity for additional traffic for a north west urban extension without the major expense of a NW link road. From the Infrastructure Delivery Plan Stage 1 Interim Version Overview Paper October 2013 we note under para 2.3.2 bullets 3, 4 and 5 that the following transport planning issues have once again been raised but not solved.	analysis and fresh independent SA with updated evidence in 2013. The inaccuracies of the earlier SA have been rectified and using current information. The proximity to the active landfill site was not considered to be significant given its distance from the site (over 1 km away from the north-eastern boundary) and its position North East of the site which would indicate that the prevailing wind would carry any odours away from the new development.
		This is a significant ecological justice issue since there is only one major way from the proposed development to Cheltenham and to the M5 south, and this way runs through areas of high social deprivation around Princess Elizabeth Way and Springbank. The UK has extremely high health inequality, with the poor significantly more likely to die prematurely than the rich, and the pollution and disturbance of the extra cars will undoubtedly exacerbate this. Save the Countryside believes that the Draft JCS Sustainability (Integrated) Appraisal Report to be error ridden and lacking in credibility. On A5 itself: para 7.60 mentions 'well-being' as one of the positives without apparently having considered the adverse effects of noise, smells and air pollution likely to affect residents on this site as explained earlier in 2.1. Para 7.61 deals with noise pollution but does not mention the existence or effects of the landfill sites to the north of A5. The document has a fundamental error in that it mentions that the river Chelt flows through the A5 site, but it does not - in fact the River Swilgate flows	

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		through the area. The report omits any references to listed buildings in Elmstone Hardwicke and Swindon Village but includes buildings in other areas outside the site such as Stoke Orchard - once again we assume because of the problem of the C3 area comprising both A5 and the safeguarded land NW of Cheltenham and consultants being unaware of this.	
ID 9088865 Carter Jonas			
1	Tewkesbury strategic options	The Sustainability Appraisal considers three strategic site options at Tewkesbury, the former Ashchurch MOD site, the proposed employment allocation on land south of the A46 and the 'Mitton' land. We have significant concerns over the consistency of approach and conclusions of the Sustainability Appraisal. For example, the key negative effect identified of developing the 'Mitton' land is that 30% of the gross site area is liable to flood. Neither Mactaggart and Mickel or the North Tewkesbury Land Consortium are promoting development on the land liable to flood. Whilst this easily overcome issue is highlighted as a key negative effect in relation to the 'Mitton' land, no key negative effects have been highlighted in relation to the Ashchurch MOD site. This is despite the HRA screening work finding that proposed development "has the potential for significant effects through increased recreational activity at the Dixon Woods SAC (4 km away) and it will require further investigation on the sensitivity of the SAC to recreational activity". We have to think about the Gloucestershire area and beyond. However, no reference is made to the wider area or specific authorities outside the JCS area that the Councils' have engaged with under the Duty to Cooperate.	The site subject to SA looked at the provision of housing development across the whole of the 126.6 ha site and it was correctly identified using Environment Agency Flood Map that 30% of the site was at risk from flooding (Appendix VIII (c), p28). At Mitton it was suggested that the major negative effects identified for flooding, could be prevented if any potential development avoided the areas of flood risk (appendix VIII (c), p28). Recommendations made by the SA were not taken into account in the overall symbol for a particular SA Objective as there was no certainty that they would be implemented. No such constraints were identified for the site considered in Ashchurch. Further investigation into recreational activity was carried out and the results recorded in Appendix IV European sites screening of the 2013 HRA Report. It was

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			found that there were no likely significant effects on the Dixton Woods SAC and this was also reported in the main HRA Report in Table 3.5. All parts of the HRA Report must be read in context with one another.
2	Land at Mitton, Tewkesbury	The JCS states Tewkesbury Town may need to play a larger role in this scenario and there are opportunities for additional development to the north and east of the town that are away from existing areas of flooding'. - The JCS Sustainability Appraisal Report (October 2013) states in relation to the 'Mitton' and that "in view of the proximity of the southern extent (of the site) to Tewkesbury Town, the SA recommended that T1a should be taken forward for further appraisal", but later states that it was "not progressed further as outside the JCS area ". The Broad Locations Report (October 2011) acknowledged that development of the site could not be relied on unless agreement can be secured with Wychavon District Council". The JCS Sustainability Appraisal does not make any reference to cross-boundary engagement with the South Worcestershire authorities in discounting the site. The 'Mitton' land has been subject to assessment, and the most recent Sustainability Appraisal work (October 2013) indicates that the site performs well, with no significant negative effects of developing the land that lies outside of the area at risk of flooding.	Noted.
ID No. 9106017			
RPS Planning & Development on behalf of Barratt Homes & North Tewkesbury Land Consortium			
1	General	On reviewing the JCS documentation, RPS is aware that the authorities have been advised independently that they have not to date considered or consulted upon appropriate reasonable alternatives to the strategy	SA/SEA is an iterative process and ongoing process to inform the development of the plan. There has not

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		being pursued, have failed to consult upon and consider site based alternatives, have not undertaken appropriate levels of SA and that the process is currently open to legal challenge. RPS is aware that the authorities have been advised on how to rectify this deficiency but have chosen not to follow that advice and instead sought to retrospectively apply SA/SEA and decision making to imply that the situation does not exist.	been retrospective application of SA. The Sustainability (Integrated) Appraisal 2013 (SA Report Oct 2013) summarised previous SA work to provide consultees with an opportunity to express their opinions on the work to date and the decisions made (section 2, pages 8-19). Section 4 explains consideration of options in plan-making & the appraisal of reasonable alternatives in SA, including the earlier work undertaken during 2009-2011 that has informed recent studies. Three options for the distribution strategy were subject to fresh independent SA with updated baseline information – details are provided in appendix VII and summary findings set out in the main SA Report (paras 7.17-27); these were subject to consultation in 2013. Site-based alternatives have been investigated in an iterative way in plan-making and SA since 2009. The earlier history is explained in sections 5 and 6 of the SA Report (Sept 2013). Broad Locations were investigated initially, and then developed into potential site allocations in 2013, taking account of earlier consultation comments and with updated evidence. Section 7 summarises

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
			the SA findings and Table 7.2 sets out the reasoning for selecting or not progressing options.
2	General	While the JCS authorities have published a Sustainability Appraisal (SA) which comprises their environmental report, the publication of a report is not sufficient alone to meet the SEA Directive as the purpose of the environmental report is to set out the manner in which the 'environmental assessment' has been undertaken in accordance with the above definition. Therefore the authorities need to ensure that they have complied with the environmental assessment requirements and the process this requires, particularly taking into account of the environmental report and consultations in the decision making process. RPS contends that while the authorities have published a SA report that seeks to articulate the process that has been undertaken, the authorities have failed in their approach to environmental assessment, namely to consider appropriate options and take into account the environmental assessment in decision making at its Council meeting.	The SA Report of the environmental assessment was published alongside the Draft JCS in 2013 such that all who are affected or likely to be affected by, or have an interest in the assessment and plan concerned, have had a chance to express their opinion on the relevant documents. These further opinions will be addressed and reported in the SA/SEA Report to accompany the Pre-submission JCS. The JCS authorities have taken into account the findings of the SA in their decision-making to inform plan-making as illustrated by the incorporation of mitigation suggested by the SA in Section 7 of the 2013 SA Report and through the refinement and selection and rejection of options.
3	General	The authorities were advised in May 2012 that the SA process was not fully compliant with Article 5(1) h of the SEA Directive in this regard and that not only should the progression of alternatives be described more clearly in the final SA but the reasons given for the selection or elimination of alternatives also articulated. The authorities were also advised that there may also be missing alternatives including those suggested through the consultation process, and if this were the case both SA and consultation is required of them.	The SA Report 2013 has provided reasons for selection and rejection for alternatives considered in section 7 (pages pages 58 – 111).

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
4	General	Instead, what has happened is the Councils have sought to retrospectively apply SA/SEA and have made inaccurate statements in the SA Report, evidence and Development Plan process to present the case that the option and appraisal process to date is robust, sound and lawful. RPS contends that it is not and the legal advice still stands.	See comment No. 1 above.
5	General	The 2013 Spatial Options Topic Paper seeks to present an extensive history of option appraisal through previous RSS process and the current JCS process, including the local Joint Study Area in an attempt to articulate that options have been thoroughly and comprehensively assessed. However, it is this work that had been evaluated in the PAS and SA/SEA Compliance Review previously and found to be wanting. Despite this, the Spatial Options Topic Paper attempts to articulate the situation using incorrect evidence and statements. The same errors are also present in the SA/SEA Report.	See comment No. 1 above.
6	General	Therefore the statements in the 2013 Spatial Options Topic Paper and the 2013 SA Report in respect of the role and function of the Part 1 consultation and the point at which the JCS had reached are factual inaccuracies. In addition 'Part 1' at no point substantiates or makes any reference specifically or by association to a focus on the urban area over any other spatial option. No references are made to urban extensions or the location, direction of development or significant Green Belt releases. This was purposely intentional as the JCS authorities were at that time re-evaluating the strategic approach to the JCS area in objection to the RSS strategy and had not determined the manner in which development should be distributed or conducted any SA/SEA of options. Equally there was significant support for protecting the Green Belt. The accurate position that RPS articulates in this statement, RPS understands was also the position articulated to legal Counsel by the JCS authorities in 2012 when seeking advice, further demonstrating that the Spatial Options Topic Paper contains factual inaccuracies.	See comment No. 1 above.

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		On this basis, the references to Part 1 in the Spatial Options Topic Paper and 2013 SA Report are factually incorrect and misleading. Indeed if the JCS authorities had determined that urban focus with Green Belt releases was to remain the strategic driver of Part 1 in 2010 and had included references to urban extensions on the basis of the spatial option consultations, this would be in advance of any formal public consultation or SA/SEA of the process. It would also be in advance of the public consultation on spatial options that the authorities publically stated would take place later in 2011. More fundamentally, however, not only is there an inaccuracy in the reporting of this stage of plan preparation but the above inaccuracies are exacerbated, particularly in the chronological statements within the 2013 SA / environmental assessment.	
7	Paragraphs 6.1 – 6.6	Paragraphs, 6.1 to 6.6 imply that a process has been undertaken that has considered and consulted on strategic alternatives, undertaken SA of those alternatives, and selected a preferred approach. It is set out that the authorities then published a Part 1 document for public consultation in-line with this work. This is not correctly reported and is an attempt to retrospectively address both missing SA/SEA work and public consultation, rather than address the issue as advised by their legal Counsel. Further inaccuracies are set out below.	See comment No. 1 above.
8	Paragraph 6.2	At paragraph 6.2 it states that during ' <i>earlier consultation for Issues and Key Questions, the strategic option for greater resilience to climate change had also considered the possibility of a new settlement rather than peripheral development around the larger urban areas</i> ' and goes on to explain how this was discounted. This is incorrect. It is a fact that the ' <i>resilience to climate change</i> ' approach was not part of the Issues and Key Questions consultation at all and occurred post this publication. Furthermore the stakeholder only consultation that occurred on the	Noted and reference to 'earlier consultations for Issues and Key Questions' to be replaced with earlier consultations for 'JCS Strategic Options and JCS Part 1 draft strategic approach' in SA/SEA Report to accompany the Pre-Submission JCS.

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
		Climate Change approach did not include the consideration of a new settlement. In fact, RPS accurately reports that the consideration of a new settlement as a potential strategic alternative only arose post the stakeholder consultation. Further evidence is available on this matter in that on seeking legal advice from Counsel, the JCS authorities instructed Counsel that in giving his legal advice on options he was advised that the concept of a new settlement had emerged late in the process and had not been presented at the stakeholder or Parish Council Events. On this basis, the statement in the 2013 SA Report on this matter is factually inaccurate and misreported. It is also inaccurate as the 2011/12 DPO Document itself reported that the new settlement alternative had been considered through consultation. It was not included within the stakeholder consultation and no public consultation has been undertaken of a potential for a new settlement within the JCS area as a strategic alternative to Green Belt releases to date. The DPO Document is incorrect in this regard also.	
9	Paragraph 6.2 and Table 6.1	More fundamentally, however, RPS draws objection to the statement in paragraph 6.2 that states that the 'Stronger Communities' strategic approach which would result in more dispersal to the rural communities was not a realistic alternative alongside the climate change approach and on this basis were not considered reasonable alternatives to be subject to SA at the time. This is again factually incorrect and retrospective statements are being made. Rural dispersal is an entirely reasonable alternative strategy that is tested through numerous development plan strategies. The reason that no SA had been undertaken at that time was simply as a result of the ongoing process, and that the SEA/SA of the alternatives was to be completed to accompany a public consultation on the spatial options, which never occurred. On the basis that this public consultation was deferred to the Preferred Option document, so was the SA work. This took place later in January 2011 as reported in table 6.1. The	JCS and SA/SEA Stages and Documents and their consultations are set out in Table 1.1 in the SA Report 2013. Three options for the distribution strategy (urban focus; rural dispersal; new settlement) were subject to fresh independent SA with updated baseline information – details are provided in Appendix VII and summary findings set out in the main SA Report (paras 7.17-27); these were subject to consultation in 2013.

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
		statement that the options were discounted as unreasonable is false. Even if as reported, the two options were discounted as paragraph 6.2 implies, the result would be that no realistic alternatives were considered to the strategy that the Topic Paper and SA Report incorrectly states was part of the Part 1 consultation.	
10	Paragraph 6.6	Paragraph 6.6 also incorrectly states that 'A draft strategic approach for Part 1 was developed and included in a Spatial Portrait; Issues; Vision and Strategic Objectives. Thus the preferred approach to the spatial strategy was presented was to focus development on the edge of the existing urban areas rather than distributing more across the rural areas. This was subject to an informal on-line public consultation through the Councils' JCS website June – August 2010". As established above, this document did not contain a draft strategic approach, nor presented a strategy of focusing development on the edge of existing urban areas through Green Belt releases rather than distributing more across the rural areas. This is an incorrect statement and the placement of this paragraph implies that it followed the SA assessment undertaken in 2011, whereas Part 1 was published in advance of any SA work being undertaken on the strategic approaches. As set out in the bullet above, if the statements as currently articulated were correct and that Part 1 did set out the new locally derived strategic approach which included Green Belt releases, it would have done so in the absence of and in advance of public consultation and SEA/SA.	Noted.
11	General	There are fundamental inaccuracies in the statements published in the Draft Plan, SEA/SA Document and the Spatial Option Topic Paper to seek to retrospectively address errors of the past rather than heed the advice of their own Counsel.	Noted.
12	General	It has been set out in the preceding section that the JCS authorities have failed to consider reasonable strategic alternatives that include the role of Tewkesbury Town, particularly in respect of significant release of Green Belt land and have retrospectively sought to apply SEA/SA to work previously	Noted.

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		undertaken. It is also observed that the authorities have sought to retrospectively test a number of 'high level' strategic options in the SEA/SA process to address some of the failings of the past.	
13	Section 7 – Table 7.1	The composition of this table (Table 7.1) is not explained in the document, nor is the quantum of development that was used to test each of the percentages. In seeking to understand this table, RPS understands that the 'Urban Capacity' column is derived from the capacities of Gloucester City, Cheltenham Town and Tewkesbury Town (including Ashchurch). The 'Urban Extensions' are all the urban extensions excluding Ashchurch, and the 'Rural Area' is the remainder of Tewkesbury Borough. In observing the results, the table does not match nor is it anywhere close to the distribution of development contained within the Draft JCS. The urban capacities of Gloucester and Cheltenham alone are 12,050 dwellings and if Tewkesbury Town commitments (and Ashchurch is added at 2,300 dwellings) as is appropriate under the Urban Focus approach, the figure is some 14,350 dwellings. It appears therefore the testing of options in 2013 does not bear any resemblance to the Draft JCS.	Noted. The distribution scenarios will be more clearly explained in Section 7 of the SA Report.
14		It is noted, however, in Appendix VII of the SA/SEA report that a figure of 30% is used for the urban capacity figure rather than the 32% in the SA/SEA Report. This adjustment would equate to a 100% figure of some 47,800 dwellings.	Noted. This will be addressed in Appendix VII and the main SA/SEA Report to accompany the Pre-Submission JCS.
15		More fundamentally, it appears that no SA/SEA assessment has been undertaken of the implications of urban focus and Green Belt release strategy based upon 33,200 dwellings or 37,400 dwellings associated with the OAN figures identified in the Draft Plan, or indeed the spatial distribution of development within the plan.	The SA/SEA considered the identified need for housing numbers at 33,200 dwellings;
16		It appears that the JCS authorities have published in their SEA/SA Report a 'high level' distribution evaluation that is related to the levels of growth associated with the LEP LEFM evidence and not that which is contained in their Draft Plan, thus supporting higher levels of development in principle;	Noted.

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		- It appears that the JCS authorities have not evaluated the level of development or distribution contained within the Draft JCS, the range of OAN presented or alternatives to them; - The authorities have not presented for consultation or explained the reasonable alternative of different distribution strategies across the JCS area; and - The authorities have failed to consider true reasonable alternative distributions as presented in their own evidence.	
17		Therefore given the deficiency of the previous SA Report, the 2013 SA Report has had to, by its own admission, retrospectively provide the reason for the selection and elimination of the alternatives for the Developing the Preferred Option Document. Paragraph 6.12 provides reference to the previous SA Report evidence and sets out in paragraph 6.13 and table 6.13 what it states is an accurate summary of the SA Findings and Reasons for Selection or Progression to consideration at Preferred Option Plan Making in the Developing the Preferred Option Document. Most notably it sets out in Table 6.13 that there were 3 locations outside of the JCS authorities administrative area that were not progressed, these were: - Broad Location G6 Land to the South of Gloucester at Brookthorpe with Whaddon; - Broad Location G7 Land to the South of Gloucester of Hardwicke; and - Broad Location T1 Land at Mitton. The JCS authorities therefore set out under the requirement of Article 5(1)h of the SEA Directive that these three locations were not progressed within the SEA/SA or plan making process on the basis that they were '<i>outside the JCS area</i>'. This is the only reason given. In this context not only is this a retrospective application of SEA and incorrect reporting of the facts, it is an invalid reason for excluding reasonable alternatives that are within the '<i>geographical scope of the plan</i>'. On these reasons alone the	Noted.

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		environmental assessment process has failed.	
18		The actual decision making that took place in 2011/12 is clearly articulated in the DPO document and no sites were rejected on grounds that they were outside of the JCS area. The 2013 SEA / SA report is therefore fundamentally incorrect and the reported reasons under Article 5(1)h of the SEA Directive are inaccurate.	As above.
19	Appendix V	It is also noted that within Appendix V of the SA Report, no reference is made to RPS's representation to the SA Report, specifically with regards to the Land at Mitton. Therefore in the context of the significance of this issue it is clearly demonstrated that in the authorities' own evidence the representations by RPS have not been considered or taken into account in the SA process. This is particularly the case where representations were made by RPS in reference to incorrect statements of fact in the initial SA Report which have been repeated in 2013 without consideration of the representations.	This response had not been made available to the SA team. This omission will be addressed in the SA/SEA Report to accompany the Pre-submission JCS.
20	General	Furthermore, RPS objects to the process by which the JCS has been considered. The authority is required to take into account the environmental report and the results of consultations "during the preparation of the plan or programme and before its adoption". By definition, 'authority' refers to the authority's elected Council. The JCS SA report was not available to Members at their Council meetings at the point of making the decision on the Draft Plan, nor was it part of the public documents presented to members for approval. On the basis that there is a requirement for the SA to be taken into account by 'the authority' when making decisions on a plan, and that the document was not available at the Council meetings in September, it cannot be demonstrated that the decisions of the three Councils have taken into account the environmental report.	Noted.
21	General	The SA has not influenced plan making fairly and publically, to an equitable basis. The JCS authorities have sought to retrospectively apply SEA/SA as a result of the advice of their SA consultants in seeking to make	The findings of the SA/SEA process have been taken into account in plan-making in an iterative and ongoing way.

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		good deficiencies identified by recent audits. In doing so, however, they have incorrectly applied SA and sought to set out that decisions have been made historically, that were not. RPS understands that the authorities have been advised by their own consultant and their Counsel (See Section 4) that they have not done enough to satisfy the requirements of the SA/SEA Environmental Assessment process and have been provided clear guidance on how to rectify this in an appropriate, legal and sound basis. This included using the current round of consultation as an opportunity to consult on site specific alternatives. However, the authorities have chosen not to heed the advice and therefore it is not possible to identify how SA has informed the plan. It appears the Plan has retrospectively informed the SA process.	
22	General	The JCS authorities instead have chosen to retrospectively apply SA/SEA to justify the Draft Plan and present a case that sites have been discounted based upon decisions made earlier in the process. Those decisions did not occur and therefore SEA/SA is being articulated to justify the plan.	Noted.
23	NTS Paragraph 24	Paragraph 24 outlines that during 2010-2011 and Developing the Preferred Option document 3 options for the spatial strategy and a number of options for potential strategic allocations and broad locations for potential plan housing and employment land were investigated through plan-making and subject to SA. Notwithstanding the objections already made, strategy options were never subject to public consultation nor have any site specific alternatives have been published for consultation.	Strategy options and site specific strategic allocation options were published for consultation in 2013. These were informed by the earlier plan-making and SA/SEA of strategic options and Broad Locations.
24	NTS Paragraph 25	The preferred approach was not urban focus, this is a derivative of the strategy allegedly chosen which is one that balanced all three elements of social, environmental and economic pillars of sustainability but with a bias towards the economy. This was understood to be the strategy, which resulted in a more urban centric approach to development. The distinction is important in strategy.	Noted.

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	Paragraph 28	15 areas for strategic allocations were not considered on an equal and comparable basis. The assessment reduced the size of some areas to more realistic areas for assessment based upon constraints, however, Land at Mitton was retained as a broad location which included significant areas of flood risk that are not located on the site promoted by RPS and therefore the assessment is bias to the sites that have been reduced in scale to remove such constraints from the SA assessments and leaving other sites unaltered to retain constraints, therein making the results worse.	Noted and reasons for not progressing Land at Mitton at stages of plan-making are summarised in the SA Report 2013 in tables 6.3 and 7.2.
25	Paragraph 29	The table illustrates that the Draft JCS will lead to significant additional jobs in Policy E1 with major positive effects for a range of employment opportunities. This is incorrect. The JCS area in Policy E1 plans for fewer jobs that forecast in the baseline economic projections and therefore will result in lower economic prosperity. The role of the SA is evaluate the effects of the plan and to achieve this is must measure the effects 'by the inclusion of the relevant environmental information into decision making'. To assume that jobs per-se lead to economic prosperity is not taking into account the 'relevant' information. The relevant information should be contained in the baseline evidence and it is not understood why this is not the case. The relevant baseline information should contain the economic forecasts held by the JCS authorities, including those produced by Cambridge Econometrics and more importantly held by the Local Enterprise Partnership. When compared to this relevant baseline information the JCS does not perform well and the effect of the Draft JCS is that it will have negative impacts on the economic potential of the JCS area. The SA will be exposed as being weak unless this is the case.	Noted. The economic forecasts were reviewed as part of the assessment and these produced three scenarios of employment growth over the plan period of between 15,600 to 28,200 jobs – this has been more clearly explained in the baseline summary in Section 3. It was considered that the provision of 21,800 jobs would still make a significant contribution towards job provision (despite being lower than the top estimate) and still have major positive effects on SA Objective 10. This has been more clearly explained in the SA (Section 7 and Appendix IX.
26	Paragraph 34	The public consultation has been identified as a weakness of the JCS and the authorities advised that the approach to date has been inappropriate and not subject to proper public consultation. This is therefore incorrect.	Noted.
27	Table 1.1	No SEA/SA undertaken of the Key Issues and Questions document. It is also noted that the JCS authorities were advised by the Government Office at the time that they could not rely on the SEA/SA of the RSS as no final SA	Noted and agreed. The SA Report 2013 in Table 1.1 stated that 'consultees were invited to consider relevant SA objectives

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		Report was published.	for each issue and question' and did not state that SEA/SA was undertaken of that stage.
28	Table 1.1	Public Consultation did not occur on the spatial options in December 2011 – February 2012. This was only a stakeholder consultation and by December 2011 in the Developing the Preferred Strategy document, no alternative approaches consulted upon. The table is factually incorrect.	The SA Report 2013 in Table 1.1 stated that in the 'JCS Stage and Documents' column that a 'stakeholder consultation Feb-March & July 2010' was undertaken. In the 'SA/SEA stage and documents' column it was reported that 'Public consultation Dec 2011-Feb 2012' was undertaken.
29	Table 1.1	JCS Part 1 draft Strategic approach. As set out in the main objection this Part 1 did not set out any draft strategic approach. It set out a vision, portrait and issues to be addressed. It did not contain any spatial direction or guidance. As set out in the main objection this is incorrect because at the time the JCS authorities were reviewing the housing requirements and general strategy and no agreed strategy was in place. Furthermore, if Part 1 had set out a draft strategic approach in 2010 this would have been in advance of any SA/SEA work on this that did not take place until January 2011 and therefore was not subject to any form of SEA/SA assessment, further demonstrating that the approach has been ill informed and retrospective. The Councils' own Counsel's advice clarifies this and therefore the statement in Table 1.1 is falsely made.	Noted.
30	Paragraph 1.14	The Draft SA Report has not been considered or approved by any Council or Member and therefore it is not possible to consider the responses in the SA document as being that of the Councils.	The SA Report was available at the joint Members Steering Group meeting and at each individual Council meeting.
31	Paragraph 2.18	No spatial options or alternatives have been considered or tested according to the Councils' own Counsel advice and that of PAS. More	Noted.

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		pertinently no distribution alternatives have ever been appraised in respect of housing and employment distribution numbers and the actual distribution contained in the SA Report bears no resemblance to the distribution contained in the Draft JCS. No appraisal of the distributions have therefore been undertaken or even aligned.	
32	Paragraph 3.14	The NPPF has provisions within it to ensure that new homes are delivered in the absence of a statutory plan on the principle of sustainable development. It is correct to state that housing may not occur in the most appropriate place, however, it is not correct to state that housing will not occur. More to the point, the delay to the JCS process has in itself resulted in significant delay to housing delivery. The absence of a JCS is unlikely to significantly affect housing delivery than the current conditions.	The SA Report 2013 states in paragraph 3.14 that 'if the JCS wasn't implemented it could result in not enough homes being delivered to meet the needs of a growing population in the three Local Authorities.' Any delay in the plan-making process can be partly attributed to external factors such as a change of government and changes to the planning system.
33	3.27	No reference is made to the significant advice given to the JCS authorities in respect of the cumulative impact of development and the potential flooding impact on Gloucester City.	Flood risk has been identified in the SA Report 2013 as a particular issue for the JCS area in the baseline in paragraph 3.27. The likely cumulative effects relating to flooding resulting from the implementation of the plan are considered later in the SA Report 2013 in paragraph 7.132.
34	Page 34	Population and Household size baseline evidence is considerably out of date and incorrect. Household size is not growing steadily over the JCS area. The authorities have undertaken a significant amount of published evidence on this to justify a declining household size in the JCS Area. In addition the forecasting that has been undertaken for the JCS area does not indicate fewer children or a net outflow of young people leading to a lower workforce in the future. The JCS authorities have undertaken extensive research in population demographics and notwithstanding RPS's	The SA Report stated that the 'number of smaller households is increasing' on page 34. The first sentence under the bullet of 'Population and Household Size' is referring to the population of the JCS area which is considered to be 'growing slowly across the JCS area with most of increase in working age population.' This

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		objection to the manner in which this has been used, the population demographics illustrate a healthy growth in young people, declining household size and a growing workforce. It is therefore clear that the evidence base for the SA is fundamentally out of kilter with the evidence base of the JCS. If assumptions have been made in the SA based upon this being the 'relevant environmental information' then the assessment is completely misguided in respect of economic assumptions, or the baseline information has not been correctly referred to / referenced.	can be clarified in the SA/SEA Report to accompany the Pre-submission JCS. Census data from the Neighbourhood Statistics website indicated that over the period between 2001 and 2011 that the trend in population with regard to in the number of children (0-15 years) has been decreasing (by just under 2000). Much of the projections put forward in the evidence base for the JCS are based on the Census data which have been referenced in the report. Population projections beyond 2021 have been added to the main report and appendix IV. Deleted reference to 'net outflow of young people.'
35	Page 34	There are not a 'significant' proportion of vacant homes or second homes in the JCS area. This is fundamentally and factually incorrect. The rate is currently comparable with a functioning housing market, although it is questionable as to whether Cheltenham's vacancy rates are at the other extreme and that the housing market is saturated.	Information taken from the Housing Improvement Programme (HIP) Report (2008)
36	Paragraphs 4.4 and 4.5	The equal assessment of alternatives is supported. It is not understood therefore why the assessment has not undertaken an equal and comparative assessment of Land at Mitton.	The Land at Mitton was not progressed further at this stage and thus was not subject to further SA/SEA.
37	4.10	It is clear that consultation has not taken place on key components of the strategy or informed the JCS / SA/SEA process.	Both plan-making and SA/SEA processes are iterative and ongoing, reflecting consultation representations received and the evidence base.
38	Paragraph 6.2	This is factually incorrect and misleading. The Key Issues and Questions document did not consider or publically consult on the climate change,	As above

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	Paragraph 6.2	economic reliance or stronger communities option as set out in paragraph 6.2. Nor did it consider a new settlement. Such options were considered later and post this consultation document, particularly the new settlement concept. This is confirmed by the Council's own brief to Counsel. The references are therefore fundamentally and factually incorrect and seek to imply that earlier rounds of public consultation included an assessment of strategic alternatives when it clearly did not, and the Councils are acutely aware that it did not and have sought legal advice in the context that it did not. The paragraph sets out that the option of climate change and stronger communities were not subject to SA as they were not considered reasonable alternatives. This is factually incorrect. No option was subject to assessment at that time as they did not exist at that time in the JCS process, equally subsequent consideration of the options was to be evaluated by SA in preparing the Developing the Preferred Options and took place in January 2011 as set out in paragraph 6.3. This is an attempt to retrospectively suggest that SA / SEA was incorporated in to the process early and not absent as it is evident that it was.	
39	Paragraph 6.6	JCS Part 1 draft Strategic approach did not set out any draft strategic approach. It set out a vision, portrait and issues to be addressed. It did not contain any spatial direction, guidance or reference to focusing development on the edge of the urban area rather than any other distribution. As set out in the main objection this is incorrect because at the time the JCS authorities were reviewing the housing requirements and general strategy and no agreed strategy was in place. Furthermore, if Part 1 had set out a draft strategic approach in 2010 this would have been in advance of any SA/SEA work on this that did not take place until January 2011 and therefore was not subject to any form of SEA/SA assessment, further demonstrating that the approach has been ill	As above

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		informed and retrospective. The Councils' own Counsel's advice clarifies this and therefore the statement in Table 1.1 is falsely made. It is therefore incorrect to state that this strategic approach was subject to public consultation. There was no public consultation on the alternative strategic approaches and the authorities are seeking to claim that there was with false statements.	
40	Table 6.3, Page 52 T1	The statement made that this site was discounted as it was outside the JCS area is fundamentally incorrect. This is not a true record of the assessment, SA conclusions or the recommendations of the evaluation. The authorities are acutely aware that the site was recommended for further in-depth evaluation within the SA process and recommended as sustainable location for development. This is also not a reason under SEA/SA Directive or the Environmental Assessment of Plans and Programmes Regulations 2004 to discount a site from the process. The SA/SEA process is flawed.	The SA Report 2013 acknowledged the conclusions of the Initial SA Report 2011 and recorded for Broad Location T1 Land at Mitton (in Wychavon District) (272.36 ha) that 'the SA recommended that T1a should be taken forward for further appraisal.' This much smaller section of the original broad location was subject to SA under 'Land at Mitton' in the SA Report 2013 referenced in Appendix VIII (c) and in section 7.
41	Paragraph 6.19	This SA work included the reference to Broad Location T1 and the Developing the Preferred Option Document clarified that land north of Tewkesbury could provide additional development land.	Noted.
42	Paragraph 7.5	The consultation responses made by RPS in respect of Mitton have not been taken into account as implied. There is no record in the consultation appendix of the SA Report of RPS's representations to the Developing the Preferred Option document despite references to other respondents.	Please see Enfusion Comments for Comments/Responses Reference Number 19. Consultation responses made by RPS were taken into account in plan-making.
43	Paragraph 7.18	It is not considered that these are realistic alternatives and that the development quantum evaluated appears to relate to a scenario of between 45,000 and 48,000 dwellings and not that of the OAN as identified by the authorities of 33,200 dwellings. The appraisal process therefore has not considered distribution issues associated with the Draft Plan.	Noted.
44	Para 7.73	The Initial SA Report identified that the distance from Tewkesbury Town	The Initial SA Report 2011 assessed a

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		Centre was a significant negative issue.	larger area known as Broad Location T2 Land to the East of Ashchurch which was 198.52 ha as recorded in Table 6.3 of the SA Report 2013 (page 52). This area was refined following the findings of the Initial SA Report 2011 to produce site MOD T2 of 128.7 ha which was assessed in SA Report 2013 – Appendix VIII (c), page 5) using an updated baseline for 2013 instead of one for 2011. Also mitigation provided by an early version of SA1 and wording in the site description was taken into account. Given that the site assessed had been amended, that the assessment was carried out using a 2013 baseline and taking account of mitigation provided, this resulted in more positive effects being identified for site MOD T2 in the SA Report 2013 than Broad Location T2 assessed previously.
45	Paragraph 7.77	The assessment that has been undertaken on Land at Mitton is incorrect and prejudicial. The area promoted for development by BH&NTLC does not contain any area of flood plain. See the Council's Strategic Flood Risk Assessment.	The site subject to SA looked at the provision of housing development across the whole of the 126.6 ha site and it was correctly identified using Environment Agency Flood Map that 30% of the site was at risk from flooding (Appendix VIII (c), p28).
46	Table 7.2 Page 82	SA/SEA is required to set out the appraisal of reasonable alternatives and clearly state the reason for selecting and rejecting alternatives over the preferred approach. Page 82 identifies that Land at Mitton has been discounted as it is not within the JCS area. This is not a robust reason for	Noted.

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		rejection of the site in the context of the SEA/SA directive and the site should be considered, consulted upon and appraised as a realistic alternative to Ashchurch and as an addition to Ashchurch in the context of a higher OAN as recommended by NLP. RPS object to the site being discounted on this basis.	
47	7.88	Paragraph 7.88 sets out that there are no negative effects from Policy E1 – Employment. RPS object to this on the basis that the current JCS document seeks to under provide against the baseline economic projections for the JCS area and significantly under-provides against the LEP's Growth Plan. The SA/SEA should reflect this in its appraisal and update of baseline evidence as it still refers to the Integrated Economic Strategy for Gloucestershire which is considerably out of date.	Noted and agreed. The baseline will be updated with the next iteration of the SA/SEA Report to accompany the Pre-Submission JCS.
48	7.137	The text at 7.137 fails to consider the significant issue of cumulative flood risk at Gloucester City identified in the Strategic Flood Risk Assessment evidence from development on the periphery of Gloucester City. This should be recognised as a cumulative effect and development at this location redirected to areas of less flood risk.	Paragraph 7.132 provides an overview of the likely cumulative effects relating to flooding resulting from the implementation of the plan. It also takes account of the mitigation provided Policy S2. This was considered robust enough to reduce any negative effects for flooding resulting from the implementation of the plan.
49	Appendix VIII(c)	Detailed site assessment work is incorrect in respect of Land at Mitton and the calibration of the assessments inaccurate. Explanation is given below.	Opinion noted. Responses to specific statements provided below.
50	Climate Change	Mitton is identified as having positive benefits in respect of climate change similar to that of T2 at Ashchurch, however, the Ashchurch allocation receives greater positive benefits. It is noted that the assessment for the two sites is identical bar the additional text in Ashchurch. The first reference states: <i>"The effects also depend upon the implementation and details of other policies. Overall the urban extension approach will better promote possibilities for delivery of climate change mitigation"</i> The same would also apply to land at Mitton and there is no clear	Site MOD T2 was anticipated to provide an additional 1000 housing and 20 ha of employment land compared to Mitton as detailed in Appendix VIII (c) and therefore was considered to be of a sufficient scale and type to warrant achieving major positive effects for Climate Change. This can be made

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
		distinction or description of why this would not. Furthermore, the additional paragraph <i>"Plus the additional scale of major development may better reach thresholds for carbon neutrality and / or provision of energy to National Grid"</i> . Again, there is no distinction of why this would not be equally applicable to the development at Mitton. The Assessment has therefore not assessed both sites equitably. Land at Mitton should have a comparable positive score.	clearer in the assessment in the SA/SEA Report to accompany the Pre-Submission JCS.
51	Flooding	RPS has fundamental objection to this assessment in respect of Flooding. Land at Mitton proposes no development within the Flood Plain and therefore references to it are incorrect. While it is appreciated that the assessment has been on a wider Broad Location basis, the assessment on other sites has been narrowed down to consider the site and developable area. It is therefore not appropriate to maintain an assessment of Land at Mitton on the basis of a wider area that includes large areas of the flood plain that are not proposed for development. Equally, it is not clear why the SEA/SA assessment is using Environment Agency Flood Maps as set out and not referring to the SFRA level 1 and 2 evidence.	All sites in the SA have been assessed using the same SA Framework and to the same level of detail. Where refinements and mitigation had already been to a site, this was taken account into the overall symbol for a particular SA Objective. The SA also suggested, where appropriate, potential mitigation and refinements to the sites which could be implemented, for example, at Mitton it was suggested that the major negative effects identified for flooding, could be prevented if any potential development avoided the areas of flood risk (appendix VIII (c), p28). Recommendations made by the SA were not taken into account in the overall symbol for a particular SA Objective as there was no certainty that they would be implemented. The SFRA was observed during the SA of the potential allocations assessment but in most cases data was sourced from the Environment Agency which reported the

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
			same high level information.
52	Natural resource	Comparison is made again to the last paragraph of Ashchurch and Land at Mitton in respect of this assessment. It is stated that both sites lie on a minor aquifer half of which is considered to be of high vulnerability and the other half is considered to be of intermediate vulnerability. However, in respect of Land at Mitton, the additional sentence is added that <i>"in the absence of mitigation to protect water quality, there could be short and long-term negative effects"</i>. RPS objects to this statement only being present in the Land at Mitton assessment. This should apply equally to Ashchurch T2. However, more fundamentally, the assessment is incorrect as none of the site for Land at Mitton falls within any aquifer. The assessment is therefore fundamentally incorrect. In respect of the paragraph referring to land at Mitton falling within a Surface water nitrate vulnerability zone meaning that it is sensitive to water pollution, Ashchurch T2 site also falls within the same nitrate vulnerability zone and yet no mention of this occurs against T2 assessment. The Assessments are therefore not equitable.	If a minor or major aquifer was present which was of high or intermediate vulnerability, any development was considered to have the potential for minor negative effects on water quality. The SA for site MOD T2 concluded that 'development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction' (Appendix VIII (c), p8) – long-term effects were implied but not explicitly stated. The surface water nitrate vulnerable zone has been added to the assessment at T2 but this has not affected the symbol given as minor negative effects had already been identified.
53	Transport	RPS has significant objection to this statement. The Land at Mitton is within close walking distance to the town centre of Tewkesbury and local education facilities. It is also closer and more accessible than the T2 Ashchurch allocation where the remoteness has been identified and yet the Ashchurch site scores more favourably. It is also noted that the Councils' Infrastructure Delivery Plan identifies that Land at Mitton has a dismantled railway track bed and bridge over the River Avon present an opportunity to provide a safe and attractive off-road cycle and pedestrian route linking the development location with the town centre and other strategic cycle routes proposed within the CSVTS. The consideration of this issue in respect of Land at Mitton is incorrect and should be considered as	The IDP 2013 in the site assessments was considered through the application of the early version of Policy SA1 in the Draft JCS which referred to infrastructure improvements as set out in the IDP 2013 although in the assessment matrices 'infrastructure improvements' was the term used. The mitigation provided by this policy was taken into account in all site assessments and affected the symbol given to each site.

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
		more significantly positive. In respect of calibration of assumptions, RPS objects to Mitton being scored as lower accessibility in respect of supporting the Town Centre of Tewkesbury when the assessment of Land at Brookthorpe / Whaddon at South Gloucester states that despite the location being some 4.4km from Gloucester City Centre, the allocation will support the vitality and viability of Gloucester City Centre. The SA/SEA should be consistent and in this context development at Mitton will support the Town Centre and reduce the dependency on the motor car. The site also has the opportunity to provide a significant contribution to the Northern Relief Road with consequential benefits allowing environmental improvements to the High Street and facilitating the redevelopment of key brownfield sites currently lacking access. This is not referred to in the assessment.	In determining the significance of effects, distance was only one factor to consider and was generally looked at in conjunction with availability of good public transport links (access to bus stops etc.) and/ or pedestrian access (pavements). Mitton was considered to lead to minor positive effects given its poor access to transport facilities – 'one bus stop located approximately 120 m from the northern part of the site' and 'limited opportunities for pedestrian access to facilities nearby' (Appendix VIII (c), page 32).
54	Waste, Pollution	RPS objects to the statements in respect of waste and pollution. The commentary refers to Tewkesbury Town Centre and the potential impact of the site on the Air Quality Management Area. This is inconsistent. The assessment of this impact would be attributable to Land at Ashchurch also and therefore RPS objects to the reference only being included in the Land at Mitton assessment. However, the Land at Mitton is far more accessible to the Town Centre and therefore significantly reduces the impact associated with this assessment criteria over that from Ashchurch. It is also RPS's opinion that the assessment of Ashchurch has not appropriately assessed the potential impact of disposal of large scale contamination from the existing site.	Site MOD T2 was to provide mixed use development (employment opportunities and other services) and was assessed as having good access to public transport and was considered to be a distance (over 3 km) from the Tewkesbury High Street AQMA. Consideration was also given to the presence of the M5 located between the site and the AQMA. With regard to these factors, it was considered unlikely to affect the AQMA and not referenced in the assessment. Mitton was anticipated to provide for a large amount of housing development (assumed over 1000 dwellings given the size), was closer to the AQMA and was assessed as having poor access to public

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
			transport. Therefore, given all these factors, the assessment considered that development at the site could lead to minor negative effects on the AQMA. It was identified in the SA (Appendix VIII (c)) for the site at MOD T2 that contamination was likely to be present and that there was likely to be a large amount of waste produced in both the short-term and long-term. Mitigation was taken into account which was provided by an early version of Policy SA1 in the plan and this was deemed sufficient to mitigate negative effects and reduce their magnitude down to minor or even neutral. This approach was applied consistently in the SA of sites.
55	Employment	RPS objects to the statements made in respect of employment. Reference to other assessments, including that at Ashchurch refer to the provision of new dwellings providing for a local workforce and therefore having positive benefits. However, in respect of Land at Mitton, the assessment makes no reference to such benefits and restricts itself from asking the question of whether employment is provided. There is clear discrepancy in the assessment of Land at Mitton compared to other assessments and on this basis Land at Mitton should receive more favourable scoring on this issue. The calibration is clearly therefore out. Also reference to Land at Ashchurch on a comparative basis is that this is not new employment and in fact will result in a loss of employment land. The assessment of the two sites requires further and accurate refinement.	In the SA the key determinant for assessing the effects on employment was whether employment land/ opportunities were to be provided or not. All sites which were to provide employment land/ opportunities were considered to lead to major positive effects and all sites which were not going to provide employment were considered to lead to neutral effects. At some sites, the provision of employment land was not known and as

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
			a result the effects were considered to be uncertain; such as was the case for Mitton. It is true that all sites where housing was to be provided could increase the supply of labour in an area including Mitton. The effect that this would have was considered to be uncertain and indirect in nature and thus not lead to any significant effects. Where it was mentioned, it was either made as an observation and in cases where no employment land/ opportunities were to be provided; it was qualified to say that it would lead to neutral effects. Ministerial statements made by the Secretary of State for Defence 2013 had indicated that MOD would be withdrawing from its site at Ashchurch entirely unless retention of a small number of specific buildings proves better value for money. This possible closure was considered to be outside of the planning authorities' control and given the loss of employment possibly some years before any potential redevelopment, the effects of the provision of employment opportunities as part of development at the site was considered to be major

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
			positive.
56	City and town centres	RPS has fundamental objection to this statement in respect of Land at Mitton. The statement is made that this site is not accessible and will not support Tewkesbury Town Centre, and yet the assessment for T2 at Ashchurch (which has been identified as remote from the town centre) has scored significantly positive. Again reference is also made to the assessment of Whaddon at South Gloucester where an allocation 4.4km from the City Centre is given a positive score to improving the vitality and viability of the Town Centre. The assessment at Land at Mitton is not comparable to other assessments and is prejudicial and incorrect. It should score considerably positively for this component and reference is also made to the Infrastructure Development Plan conclusions, from which the evidence for this assessment should be sourced. RPS has provided in Appendix 2 a concentric assessment of Land at Mitton in respect of Tewkesbury Town Centre that articulates the point satisfactorily.	Site T2 at Ashchurch was identified as being 'well located in relation to Ashchurch itself and the main settlement of Tewkesbury (Appendix VIII(c), p12). Many factors were considered in deciding on the overall effects on City and Town Centres of development at a particular site, including the description of the development proposed at each site. Minor negative effects were identified for sites: which were to provide housing only; that had poor access to public transport or park and ride services; which had poor access to major roads (A roads and/or Motorways); and/ or where no transport improvements had been identified. Furthermore, distance was also taken into account using Google Earth to measure distances along main roads to a centre. The Mitton site and also land at Hardwicke met the majority these factors and as a result both were considered likely to lead to minor negative effects. The MOD T2 site at Ashchurch was identified as having good access to public transport, having good access to several main roads and also was to provide for both new housing and additional employment (mixed used). As

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
			a result is considered likely to have major positive effects. For the Brookthorpe/ Whaddon site the main factor for the assessment determining that minor positive effects could result from development was due to the presence of a number of bus stops providing a good link to Gloucester city centre. The amount of development was also a factor which is significantly smaller than Mitton. The GCT JCS IDP in the site assessments was considered through the application of the early version of Policy SA1 in the Draft JCS which referred to infrastructure improvements as set out in the IDP 2013 although the IDP was not explicitly mentioned. The IDP was included as part of the Baseline in the 2013 SA Report in Appendix IV.
57	Sustainable Communities: Equality	RPS objects to the scoring used in this and the balance between Ashchurch T2 and Land at Mitton. The assessment text is virtually identical apart from the last additional sentence in T2 Ashchurch which states that <i>"The urban extension approach provides a scale at which high quality design and accessibility for all should be more deliverable and certain"</i> . This is no different from Land at Mitton and therefore the assessment of Land at Mitton is inaccurate and should be rated more positively. In respect of T2 it has been identified as being remote, a significant distance from the town centre and have poor access to educational facilities. In this	Sites which were to provide housing only (approximately 1000 dwellings or under) with no specific transport improvements or employment provision identified were generally considered to have minor positive effects and Mitton met this criteria. Site MOD T2 was anticipated to provide an additional 1000 housing and 20 ha of employment land compared to

Ref No	SA Report Reference	Consultee Representations	Enfusion Comments
		context Land at Mitton should be increased positively and Ashchurch reduced in its score. The assessment again is not equitable.	Mitton and therefore was considered to be of a sufficient scale and type to warrant achieving major positive effects on Sustainable Communities: Equality. Further to this, distance from an existing centre was also taken into account when considering the magnitude of the effect subject to specific mitigation being required in the site policy wording and/ or access to existing public transport. Mitton was identified as having poor access to transport facilities (page 34, Appendix VIII (c)). Therefore, overall this lead to Mitton being given the symbol for minor positive effects on Sustainable Communities: Equality. The number of dwelling has been inserted into the description of development in appendix VIII (c).
58	Education	RPS objects to the assessment of education. The site is conveniently located for existing education facilities and therefore should be scored more positively. The site is given the same score as T2 where the assessment is very clear that the site does not have good access to educational facilities. The assessment between the two sites is therefore inequitable.	Google Maps were used to establish that at least 50% of the site was over 2km from the nearest school which was considered to be Mitton Manor Primary School. Effects were considered to be uncertain given the distance from educational facilities and because it was not known whether provision for employment land and new educational facilities would be made. This approach was used throughout the SA.

Appendix VI: Compatibility Analysis SA of JCS Vision and Objectives

Key:

Neutral	○
Very Compatible	++
Compatible	+
Uncertain	?
Incompatible	-
Very Incompatible	--

Compatibility Analysis SA of JCS Vision

JCS Vision 2013

By 2031 Tewkesbury Borough, Cheltenham Borough and Gloucester City will have continued to develop as **highly attractive and highly accessible places** in which to live, work and socialize.

The Joint Core Strategy area will be recognized nationally as enjoying a **vibrant, competitive economy** with increased job opportunities and a strong reputation for being an attractive place in which to invest.

The **character and identity of individual communities** will have been retained while *improved access to housing* will have addressed the needs of young families, single people and the elderly.

New developments will have been built to the **highest possible standards of design** and focused protecting the quality and distinctiveness of each community.

Established in **sustainable locations**, without increasing the risk of flooding, new development will have been designed with sensitivity towards existing villages, towns and cities and with **respect for the natural environment**.

As a result of a strong commitment to the housing and employment needs of the existing and growing population, all residents and businesses will benefit from the **improved infrastructure**, which will include roads, public transport and services, and community facilities.

SA Objectives		Compatibility Analysis
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	+
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	+
3	CLIMATE CHANGE ADAPTATION	+

SA Objectives		Compatibility Analysis
	Adapt to the consequences of climate change	
4	FLOODING Manage and reduce flood risk and surface water run-off	
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	+
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and greenfield land through good design	+
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	+
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	++
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	?
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	++
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	+
12	SUSTAINABLE COMMUNITIES Reduce inequalities in wellbeing and opportunity	+
13	SUSTAINABLE COMMUNITIES Reduce crime and the fear of crime	+
14	HEALTH Improve access to health facilities and promote healthy lifestyles	++
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	++

SA Objectives		Compatibility Analysis
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	++
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	?
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	+

Summary:

The vision is highly compatible with the majority of the SA Objectives, particularly those relating to Flooding, Transport, Economy, Health, Housing and Green Space. It was also found to be compatible with City and Town Centres, Sustainable Communities, Biodiversity, Climate Change, Natural Environment, Historic Environment, and Culture and Tourism.

There were two uncertainties for waste/pollution and education/skills identified within the compatibility analysis. It may be considered that the wording referring to 'the highest possible standards of design,' implicitly includes measures which would support the SA objective of Waste and pollution. With regard to Education/Skills, inserting 'learn' after 'live' before 'work' would improve the certainty of positive effects for progressing this SA Objective.

It is suggested that the third paragraph relating to character and identity could be improved to address the needs of all protected characteristics. This can be done by amending the third paragraph of the Vision to read 'the character and identity of individual communities will have been retained while improved access to housing will have addressed the needs of **[all including]** the needs of young families, single people and the elderly.

Compatibility Analysis SA of JCS Objectives

GCT Draft JCS Strategic Objectives	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Building a strong and competitive economy	+	?	?	+	+	+	+	+	?	++	++	+	?	?	○	?	++	++
Ensuring vitality of town centres	+	+	+	○	+	+	+	+	+	++	++	+	?	?	?	?	?	+
Supporting a prosperous rural economy	?	○	○	○	○	+	○	○	?	++	○	++	○	?	○	○	?	+
Conserving and enhancing the environment	++	+	+	+	+	+	++	○	+	+	○	+	○	+	+	++	○	+
Delivering excellent design in new developments	?	?	?	?	+	?	?	+	?	?	?	+	?	+	+	?	+	?
Meeting challenge of climate change	?	++	++	++	?	++	?	+	++	+	○	+	○	+	+	++	?	?
Promoting sustainable transport	?	+	?	?	?	?	?	++	+	+	+	++	+	+	+	?	+	+
Delivering a wide choice of quality homes	+	+	+	+	+	+	+	+	?	+	+	+	+	+	++	+	?	?

GCT Draft JCS Strategic Objectives	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Promoting healthy communities	+	+	○	○	+	○	○	++	+	+	+	++	?	++	○	++	+	?

Summary:

The GCT Draft JCS Strategic Objectives which seek to support the Vision are overall compatible with the majority of SA Objectives. At this strategic high level there are complex inter-relationships between the JCS Objectives; some are wide reaching in their potential effects whilst others are neutral or not relevant because some plan objectives are very specific and therefore only relate to certain SA topics.

Overall, the SA found that at least one JCS Objective is compatible with at least one of all the SA Objectives which means that all uncertainties are mitigated to a certain extent. Some uncertainties exist due to the high level nature of the Objectives and cannot be mitigated until more details are known at a later stage or lower level of the plan making process. However, some recommendations can be made to certain JCS objectives to reduce uncertainty and lead to more certain positive compatibility effects as follows:

Recommendations

- There are no JCS objectives relating specifically to safety, and waste and pollution. Safety could be easily captured in the wording in: 'Building a strong competitive economy;' 'Ensuring vitality of city/town centres;' 'Requiring good design;' and 'Promoting healthy communities.' The latter two Objectives could also easily incorporate sub-objectives to reduce waste and pollution.
- 'Meeting the challenge of climate change' should be consistent with the requirements for BREEAM and Code for Sustainable Homes as set out in Policy S 3. The Policy sets a higher standard after 2016 for development to meet.

Appendix VII: Sustainability Appraisal of Strategic Development Distribution Strategy

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
--	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

Distribution Scenario	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A. Urban Focus	+	+	++	++	?	+	?	++	++	++	?	++	++	+	++	+	+	+
B. Rural Dispersal	--?	-	?	?	-?	-	?	-	-?	-?	-	?	++	?	++	?	?	?
C. New Settlement(s)	++ --?	++ -?	+++ -?	++	-	++ --	?	++	++	-?	--	?	++	++ -?	++	++	?	?
Uncertainty of effects associated with quantum of development & capacity/character of urban and rural areas to accommodate development growth, and the individual site or broad locational characteristics. As the quantum of new development increases, the risk of negative effects may increase together with reduced certainty of mitigation effectiveness. However, increasing quantum may also reach a threshold above which development could result in positive effects, for example, provision of additional supporting services, and viability of a renewable energy scheme. The significance of certain effects (positive & negative) and the effectiveness of potential mitigation possibilities are dependent on more detailed site studies & other policies (Strategic, Core, Allocations & Delivery). For example, all new development can be designed to reduce crime and reduce inequalities through enhancing accessibility; all new development can be required to be subject to high standards of sustainability and design quality.																		

A: URBAN FOCUS Urban Areas for Gloucester, Cheltenham & Tewkesbury 32%; Extensions at Urban Edges 63%; rural area 5%				
	Assessment of Effects			
	Sustainability Objective	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	An urban focus reduces potential negative effects on existing designated & locally important bio/geo-diversity in the rural areas. Focusing development in town centres & especially urban edges can offer opportunities for positive cumulative biodiversity effects ^{1 2} in the mid to longer term through green infrastructure ³ strategies & plans that promote multi-functionality of green spaces (see also interconnected SA objectives on climate change adaptation (3), flooding (4), cycling/walking (8), health/well-being	+ -?	The higher quantum of development may make it more difficult to ensure no net loss ⁵ of biodiversity and promote use of an ecosystems ⁶ approach. Potential conflicts between biodiversity needs and other uses such as recreation may be mitigated through a coordinated strategic approach – a JCS GI Strategy and integrated with the Gloucestershire Strategic Nature Maps (SNAs) ⁷ .

¹ <http://www.tcpa.org.uk/pages/biodiversity-by-design.html>

² http://www.tcpa.org.uk/data/files/TCPA_TWT_GI-Biodiversity-Guide.pdf

³ GI is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality benefits for local communities (NPPF, 2012)

⁵ EU Biodiversity Strategy

<http://www.gloucestershirebiodiversity.net/actionplan/imap.php>

⁶

		(12, 14), & green space (16). However, large urban extensions can also reduce the connectivity of habitats & restrict movements of species through & around urban areas – some uncertainty as significance depends upon site proposals, characteristics & sensitivity of the receiving biodiversity. Gloucestershire has a rich & varied biodiversity ⁴ and Gloucester, particularly compared to other cities, has a rich biodiversity; the number of Local Nature Reserves (LNRs) is increasing (NE data) throughout the JCS area & many are near existing built-up areas.		As well as designated LNRs, many green & brownfield sites have important biodiversity and potential negative effects will need to be mitigated through strong development management policies, creative planning briefs and masterplanning.
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	All new development can provide energy & emissions efficiencies through high standards of sustainable construction ⁸ & operation, but such positive effects are less significant with smaller scale projects which may be adversely affected by viability & deliverability factors. The focus on the urban areas & edges will increase accessibility with positive effects through reducing dependency on fossil fuels.	+	Potential positive effects will need to be ensured through strong development management policies, creative planning briefs and masterplanning.
3	CLIMATE CHANGE	All new development, people & communities can be made resilient to the effects of extreme	+?	The significance of positive effects is dependent upon the details of the

⁴ <http://gloucestershirebiodiversity.net/>

⁸ Planning for Climate Change – guidance for LAs (Planning & Climate Change Coalition, 2012) suggests that all development of 10 or more dwellings should demonstrate design for a low-carbon future

	ADAPTATION Adapt to the consequences of climate change	weather. However, economies of scale indicate that larger scale developments are more likely to be able to effectively implement adaptation possibilities, and this includes the positive effects from integrating Sustainable Urban Drainage Systems in new development. Some uncertainty as depends on development & location details. The JCS area has unique water management characteristics with complex river basin planning⁹ including rivers and the Gloucester & Sharpness Canal. Increasing levels of abstraction are placing pressures on water resources¹⁰ although generally the RBMP indicates that surface water quality is improving. Flooding is assessed by the following SA Objective No 4. However, it is important that water management is planned in an integrated and holistic way covering all its functions & services. The higher development quantum may make it difficult to fully incorporate SUDS – some uncertainty & depends upon locational details.		proposed development & the condition/sensitivity of the receiving environment & communities; positive effects should be optimised through strong development management policies, & creative planning briefs/masterplanning.
4	FLOODING Manage and	The importance of the water environment to the JCS area has been noted at the national ¹¹ level through flooding, particularly in the Tewkesbury	+? -?	It will be important to promote appropriate SUDS in an integrated manner, especially since some urban sites are likely to be

⁹ Environment Agency, 2009 Severn River Basin Management Plan <http://www.environment-agency.gov.uk/research/planning/124941.aspx>

¹⁰ Water Resource Management Plan (Severn Trent Water, 2010)

¹¹ For example - <http://www.bbc.co.uk/news/uk-england-gloucestershire-20493034>

	reduce flood risk and surface water run-off	area. The Strategic Flood Risk Assessments¹² indicate that an increase in flood extent & depth is expected SA comments for SUDS as for SA Objective No 3 adapting to climate change above.		within functional floodplains; effective mitigation will require creative briefs & masterplanning regarding site density, layouts & uses. Opportunities for integrating other functions for biodiversity & community benefits such as recreation/amenity should be considered as part of the wider Green Infrastructure Strategy (and see SA Objectives No 1 Biodiversity; No 16 green Space).
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	All new development can be of high quality & locally distinctive – dependent on strong development management policies; also designed & managed to improve water quality, where applicable, in planning briefs & masterplans. About 20% of Cheltenham & about 30% of Tewkesbury Boroughs are within the Cotswold AONB¹³ which is important for protecting the unique character & setting for the JCS area. The settings of individual settlements in the rural area will be protected by the urban focus. Some uncertainty and more detailed information is required to determine significance and effectiveness of mitigation possibilities.	?	The higher development quantum may make it may be difficult to mitigate potential negative effects on the distinctive & important townscapes of the urban areas & edges – depends upon quantum, proposed development, site characteristics & sensitivity of receiving environment & communities. Strong DM policies will be needed.

¹² Halcrow - SFRA Level 1 (Sept 2008) and SFRA Level 2 (Oct, 2012)

¹³ <http://www.cotswoldsaonb.org.uk/?page=InteractiveMap>

6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and greenfield land through good design	Promoting development with an urban focus is likely to encourage the redevelopment of previously developed land (PDL) with positive effects for the soil resource; however, there is limited PDL now in Gloucester & there will be pressure on greenfield sites in urban areas.	+ -?	Mitigation possibilities for high quality and sustainable design through strong DM policies – depends on location and sensitivity of receiving environment and communities.
		Less dispersed urban focused development is likely to be able to better incorporate sustainable water use. About 15% of Cheltenham and about 15% of Tewkesbury Boroughs are within the Green Belt, which is important for preventing coalescence of urban areas and helping to retain distinctive characters & settings. A review of the Green Belt ¹⁴ has confirmed 8 strategic areas that make contributions to the Green Belt and 3 strategic areas that only make a limited contribution; a number of additional strategic areas were suggested. This may constrain development at the urban edges with uncertain negative effects for the use of greenfield natural resources.		
7	HISTORIC ENVIRONMENT	All new development can promote good design that enhances the public realm and this is dependent upon strong DM policies.	?	Mitigation of negative effects on the historic environment is difficult as heritage assets & their settings cannot be replaced

¹⁴ Amec for GCT JCS, 2011 Green Belt Boundary Review

	Protect and enhance the area's distinctive historic environment	Gloucester, Cheltenham & Tewkesbury have important historic characteristics & assets as evidenced, for example, by high numbers of Conservation Areas; high numbers of Scheduled Monuments in Gloucester & Tewkesbury; and high numbers of listed buildings in Cheltenham & Tewkesbury¹⁵. This will require careful consideration due to the quantum of the new development proposed; however, redevelopment of vacant/derelict sites/buildings will have positive effects on the settings of heritage assets. Nature & significance of effects uncertain – dependent upon DM policies & site locations and more information is needed.		or recreated. The urban focus will require strong DM policies, creative briefs & masterplanning, to ensure that the distinctive historic environment is protected & enhanced.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private	30% of Gloucester & Cheltenham residents have 2+ cars¹⁶, which is similar to the national average at 29.47%, whilst Tewkesbury has higher at 40% & reflects the rural nature of the district. The urban focus will provide new development in existing major urban areas with existing (and new) services, jobs, leisure & amenities in short and longer term with potentially major positive effects through reducing the need to travel & optimising opportunities for cycling, walking and public transport, thus reducing the use of high carbon modes of transport.	++	Pressures and potential negative effects on existing services may be mitigated through strong DM policies & careful phasing of housing and supporting infrastructure, including developer contributions. Opportunities for sustainable transport should be integrated within a sustainable transport strategy, the Green Infrastructure Strategy and utilising possibilities for Local Sustainable Transport fund¹⁷ – to optimise further indirect, cumulative & longer term benefits for human health.

¹⁵ See data on Council websites for Gloucester City, Cheltenham & Tewkesbury Borough Councils

¹⁶ ONS Census 2001

¹⁷ <https://www.gov.uk/government/publications/creating-growth-cutting-carbon-making-sustainable-local-transport-happen>

	car	New development can also have negative effects through overloading of existing services.		
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The urban focus will utilise existing waste management facilities & the quantum of development could place pressures on services.	+	Any potential negative effects of pressures on existing waste services from the quantum of new development can be mitigated through careful planning & phasing, including through strong DM policies. Light and noise pollution can be mitigated by good design through strong DM policies, and during construction by appropriate Environmental Management Plans (EMPs).
		The focus on centres & urban edges should reduce journeys by private vehicle thus minimising negative effects of emissions on air quality.		
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	An urban focus is likely to have major positive effects for encouraging inward investment & supporting growth of new & existing employment areas.	++	The major positive significance is dependent upon strong DM policies, site locations, creative briefs & masterplanning. The higher quantum of employment land will need careful phasing with housing, supporting infrastructure & other services.
		Promoting economic resilience in the urban centres & edges also has the potential to support positive effects indirectly on local rural economies.		

11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The urban focus is likely to have major positive effects on supporting the vitality & viability of city and town centres. However, large urban extensions could potentially divert investment away from existing city & town centres. Uncertainty as depends on type, size, location & sensitivity of site & communities.	?	Development will need to be well located to urban centres for positive effects.
		All new development can be of high quality & enhance the public realm – dependent on strong development management policies, specific site locations, creative briefs & masterplanning. With the higher quantum of development, phasing will be particularly important.		
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	All new development can reduce inequalities through good design – dependent upon strong DM policies for design and accessibility.	+?	
		Uncertainty as depends upon type, size, location & sensitivity of receiving communities. An urban focus is more likely to provide accessibility to opportunities for well-being with living environmental conditions (the most prevalent forms of deprivation ¹⁸ in the JCS area).		
13	SUSTAINABLE COMMUNITIES:	All new development can reduce crime & fear of crime through good design – dependent upon strong DM policies for design and accessibility.	+?	

¹⁸ South West Observatory Indices of Deprivation 2010 Gloucestershire Summary

	SAFETY Reduce crime and the fear of crime	Uncertainty as depends upon type, size, location & sensitivity of receiving communities. Gloucester & Cheltenham have a number of Lower Super Output Areas for crime¹⁹ and the urban focus could help reduce these.		
14	HEALTH Improve access to health facilities and promote healthy	The urban focus is likely to have positive effects for accessibility to health facilities, cycling/walking, and open/green spaces (see also SA objectives on transport & green space). The scale of urban extensions is more likely to be able to provide additional health services and other improvements to accessibility, including open/green space.	+	Improvements to accessibility can be ensured through strong & clear DM policies, creative planning briefs & masterplanning. Clear requirements should be set out in an integrated Green Infrastructure Strategy to optimise possibilities for positive effects on health through access to cycling, walking & open/green space. With the higher quantum of development, phasing will be important.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The urban focus is likely to have major positive effects on viability & deliverability of a range & mix (type, size, tenure, flexibility) of housing to meet the needs of everyone in the JCS area.	++	The higher quantum of development indicated will require careful planning with possibilities for size, type & flexibility of housing, including sufficient affordable housing, needing to be investigated further with regard to urban capacities & locations. With the higher quantum of development, phasing will be important for supporting infrastructure and services.
16	GREEN SPACE	Focusing development in town centres, and especially at the urban edges, can offer	+	With the higher quantum of development,

¹⁹ Ibid

	Create, enhance, protect, connect and improve access to open spaces	opportunities for positive cumulative effects in the mid to longer term through green infrastructure²⁰ (GI) strategies & plans that improve accessibility and promote multi-functionality of open/green spaces. Redevelopment & regeneration can also bring previously inaccessible spaces into public access. Overall, the GI asset in the JCS area is good²¹ but there are pinch points, barriers & gaps for access; the urban focus approach would have positive effects on green space, particularly for the Rivers Severn, Swillgate & their washlands, the Canal Trusts, Sustrans & other cycle routes, and towards the Cotswolds. Development at the urban edges can increase GI assets & facilitate connectivity between the countryside and the cities. Significance depends upon quantum of development & strength of DM policies, planning briefs & masterplanning.		it will be important to protect existing open space & maximise opportunities from development opportunities through carefully coordinated planning briefs & masterplans in line with a Strategic GI Strategy. Strategic DM policy²² should include a requirement to contribute to GI aspirations Consideration should be given to including progression towards GI objectives through the SA (and AMR) monitoring
17	EDUCATION AND SKILLS	Urban focus provides opportunities for improving accessibility to education & life-long learning, including integrating with existing provision.	+	Potential negative effects through overloading existing services could be mitigated through careful planning,

²⁰ GI is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality benefits for local communities (NPPF, 2012)

²¹ Green Infrastructure Study (Draft, March 2013)

²² LPAs should set out strategic approach for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (para 114 NPPF, 2012)

	Improve access to education and life-long learning and enhance skills	However, there could also be negative effects through overloading existing educational services. Significance depends upon site locations & strong DM policies.		particularly phasing.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Urban focus optimises opportunities to enhance the established cultural & tourism qualities of the urban areas and increase accessibility.	+	Potential negative effects through overloading existing services & facilities could be mitigated through careful planning. However, this will be challenging in consideration of the high number of listed buildings and Conservation Areas contributing to the cultural heritage of the JCS area.
		However the quantum of development proposed has the potential for negative effects through overloading existing cultural heritage services & facilities (and see also SA Objective No 7). Significance depends upon DM policies.		

Summary of Key Negative & Positive Effects for Sustainable Development:

1. Potentially negative effects on biodiversity in urban areas but reduces effects on rural areas.
2. Larger urban extensions likely to be able to incorporate sustainable energy, water and transport systems with positive effects.
3. Increased risk of negative effects on historic environment, townscapes & open/green space.
4. Major positive effects for encouraging inward investment & supporting employment leading to economic resilience in both urban and rural areas.
5. Positive effects for communities, particularly through accessibility – phasing will be important to ensure that existing services are not overloaded and that provision of new services is timely.
6. Major positive effects for housing as likely to provide the range and mix of housing to meet the needs of everyone within the timescale of the JCS.
7. Overall, the strategic option for distributing development through an urban focus has the most positive effects; although some potential effects on environmental quality and services for communities are indicated, these may be mitigated through careful planning and phasing of development. This option also has more certainty. Thus the urban focus option is indicated to be the most sustainable strategic option for the JCS.

B: RURAL DISPERSAL				
Urban Areas for Gloucester, Cheltenham & Tewkesbury 32%; Extensions at Urban Edges 0%; rural area 68 %				
	Sustainability Objective	Assessment of Effects		Mitigation Possibilities, Residual Effects Recommendations for plan-making
		Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The scale of development dispersed across the rural area will have negative effects on existing designated & locally important bio/geo-diversity in the rural area; however it may also have an indirect positive effect by reducing pressure on the existing biodiversity in urban centres & edges. The quantum of development is likely to increase use of private vehicles unless combined with improvements to public transport, employment & services (which are unlikely to be economically sustained) with negative effects on biodiversity through increased disturbance and poorer air quality. It will be difficult to ensure no net loss of biodiversity and promote use of an ecosystems approach indicating major negative & cumulative effects. It may also be more difficult to maintain and enhance connectivity between green spaces &	--? +?	Likely to be more difficult to mitigate negative effects from dispersed smaller sites. As well as designated LNRs, many green & brownfield sites have important biodiversity and potential negative effects will need to be mitigated through strong development management policies, creative planning briefs and masterplanning.

		habitats in the urban and rural areas if there is no planned development at the urban edges. Gloucestershire has a rich & varied biodiversity ²³ and Gloucester, particularly compared to other cities, has a rich biodiversity; the number of Local Nature Reserves (LNRs) is increasing (NE data) throughout the JCS area & many are near existing built-up areas.		
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	All new development can provide energy & emissions efficiencies through high standards of sustainable construction & operation, but such positive effects are less significant with smaller scale projects which may be adversely affected by viability & deliverability factors. Dispersal through the rural areas may limit the opportunities for larger scale schemes that are more effective for climate change mitigation. A more fragmented, dispersed form of development is inherently less efficient of energy than a freestanding settlement or urban extension. Dispersal through the rural areas is likely to promote continuing use of the private vehicle with direct cumulative negative effects for carbon emissions.	-	Difficult to mitigate negative effects as smaller dispersed developments are less likely to reach thresholds at which different options for energy efficiencies are economically viable.
3	CLIMATE CHANGE ADAPTATION	All new development, people & communities can be made resilient to the effects of extreme weather. However, economies of scale indicate	?	Smaller, more dispersed sites are less likely to be able to integrate appropriate SUDS.

²³ <http://gloucestershirebiodiversity.net/>

	Adapt to the consequences of climate change	that larger scale developments are more likely to be able to effectively implement adaptation possibilities, and this includes the positive effects from integrating Sustainable Urban Drainage Systems in new development. Some uncertainty as depends on development & location details. The JCS area has unique water management characteristics with complex river basin planning²⁴ including rivers and the Gloucester & Sharpness Canal. Increasing levels of abstraction are placing pressures on water resources²⁵ although generally the RBMP indicates that surface water quality is improving. Dispersal through the rural areas will result in less pressure for sustainable water management using SUDS in the urban areas; the effects on the rural areas are uncertain as SUDS are less likely to be implemented. Flooding is assessed by the following SA Objective No 4. However, it is important that water management is planned in an integrated and holistic way covering all its functions & services.		The quantum of development proposed is also likely to be associated with negative effects on landscape and visual amenity that might limit SUDS options, as well as limited land available to implement SUDS, in the rural areas.
4	FLOODING	The importance of the water environment to the JCS area has been noted at the national ²⁶ level	?	Uncertainty, although with less likelihood of implementing appropriate SUDS, negative

²⁴ Environment Agency, 2009 Severn River Basin Management Plan <http://www.environment-agency.gov.uk/research/planning/124941.aspx>

²⁵ Water Resource Management Plan (Severn Trent Water, 2010)

²⁶ For example - <http://www.bbc.co.uk/news/uk-england-gloucestershire-20493034>

	Manage and reduce flood risk and surface water run-off	through flooding, particularly in the Tewkesbury area. The Strategic Flood Risk Assessments ²⁷ indicate that an increase in flood extent & depth is expected. SA comments for SUDS as for SA Objective No 3 adapting to climate change above.		effects are indicated.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	All new development can be of high quality & locally distinctive – dependent on development management policies; also designed & managed to improve water quality, where applicable. Dispersal in the rural areas may reduce potential negative effects on townscapes in the urban areas but will increase risk of negative effects in the rural areas, including the Cotswold AONB. About 20% of Cheltenham & about 30% of Tewkesbury Boroughs are within the Cotswold AONB ²⁸ which is important for protecting the unique character & setting for the JCS area. Negative effects likely on the settings for individual settlements through the scale of new development proposed through rural dispersal.	-?	Mitigation possibilities depend upon size/layout, site characteristics & sensitivity of receiving environment and communities; strong DM policies will be necessary.
				The higher development quantum is likely to make it difficult to mitigate potential negative effects on the locally important landscapes of the rural areas.
6	NATURAL ENVIRONMENT AND	Dispersed smaller developments are less likely to be able to incorporate sustainable water use.	-	Negative effects on Green Belt through potential use of greenfield land are likely to be difficult to mitigate due to physical

²⁷ Halcrow - SFRA Level 1 (Sept 2008) and SFRA Level 2 (Oct, 2012)

²⁸ <http://www.cotswoldsaonb.org.uk/?page=InteractiveMap>

	RESOURCES: USE Minimise the use of natural resources including soil, water and greenfield land through good design	Loss of soils and agricultural land is likely to be greater with this option & of more significance for negative effects. About 15% of Cheltenham and about 15% of Tewkesbury Boroughs are within the Green Belt, which is important for preventing coalescence of urban areas and helping to retain distinctive characters & settings. A review of the Green Belt²⁹ has confirmed 8 strategic areas that make contributions to the Green Belt and 3 strategic areas that only make a limited contribution; a number of additional strategic areas were suggested. This will constrain potentially dispersed development around the urban areas with negative effects on the Green Belt.		constraints.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	All new development can promote good design that enhances the public realm and this is dependent upon strong DM policies. The rural dispersal approach will reduce pressures on those urban areas with their rich heritage assets & settings from the potential negative & positive effects of new development. Nature & significance of effects uncertain – dependent upon DM policies & site locations.	?	Mitigation of negative effects on the historic environment is difficult as heritage assets & their settings cannot be replaced or recreated.

²⁹ Amec for GCT JCS, 2011 Green Belt Boundary Review

8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	30% of Gloucester & Cheltenham residents have 2+ cars ³⁰ , which is similar to the national average at 29.47%, whilst Tewkesbury has higher at 40% & reflects the rural nature of the district. New development through rural dispersal is unlikely to reach thresholds that might encourage improved public transport indicating negative effects from additional private car journeys to access services & amenities – and travel to work.	-	Some mitigation may be possible by limiting dispersal to areas serviced by existing public transport; and providing employment to help reduce commuting by private vehicles – however, it is unlikely that such inward investment would be available through rural dispersal throughout the JCS area.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The rural dispersal will have some negative effects since there will be increasing reliance on the private vehicle with associated CO ₂ emissions. Significance overall is uncertain. Local composting of waste may be easier in rural areas.	-?	Any potential negative effects of pressures on existing waste services from the quantum of new development can be mitigated through careful planning & phasing, including through strong DM policies. Light and noise pollution can be mitigated by good design through strong DM policies, and during construction by appropriate EMPs.
10	THE ECONOMY	Rural dispersal not supported by a focus for inward investment in the city centres/edges is less certain;	-?	

³⁰ ONS Census 2001

	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	overall uncertainty as viability for employment in the rural areas is less certain. Only 5% housing & employment land is suggested in this scenario and it is unlikely that this is sufficient to sustain rural businesses.		
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Negative effects on vitality & viability of Gloucester, Cheltenham & Tewkesbury centres with rural dispersal. All new development can be of high quality & enhance the public realm – dependent on strong development management policies, specific site locations, creative briefs & masterplanning.	-	
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	All new development can reduce inequalities through good design – dependent upon strong DM policies for design and accessibility. Uncertainty as depends upon type, size, location & sensitivity of receiving communities.	?	
13	SUSTAINABLE COMMUNITIES:	All new development can reduce crime & fear of crime through good design – dependent upon	+?	

	SAFETY Reduce crime and the fear of crime	strong DM policies for design and accessibility. Uncertainty as depends upon type, size, location & sensitivity of receiving communities.		
14	HEALTH Improve access to health facilities and promote healthy	Rural dispersal may reduce opportunities for improving accessibility in & around the urban areas. Significance for the rural areas is uncertain as dispersed smaller developments may not provide additional services and are less likely to be able to offer benefits for accessibility & improvements to green space.	?	Improvements to accessibility can be ensured through strong & clear DM policies, creative planning briefs & masterplanning.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	Rural dispersal effects are uncertain since there may be positive effects for additional housing to enhance the vitality of certain settlements, whilst there may be some negative effects for additional housing that may be difficult to integrate with existing communities. It is likely to be difficult to provide the range of housing types & tenures through the rural areas; therefore uncertainty.	+?	
16	GREEN SPACE	Rural dispersal will limit possibilities with indirect negative effects for improving GI assets and	-? ?	

	Create, enhance, protect, connect and improve access to open spaces	accessibility to green space through new development on the urban edges. Smaller developments are less likely to be able to include developer contributions towards green space due to economic factors. Significance uncertain.		
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	Rural dispersal may limit opportunities for improving educational accessibility as a result of no new development in the urban edges – and with potential negative effects on sustainable transport. Overall significance uncertain as viability for employment in the rural areas is less certain.	?	
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Rural dispersal may limit opportunities for improving cultural heritage as a result of limited new development in the urban areas. Significance uncertain.	?	

Summary of Key Negative & Positive Effects for Sustainable Development:

1. Major negative effects for locally important biodiversity but will protect biodiversity in urban areas.
2. Negative effects on climate change adaptation & mitigation, flooding, transport and accessibility as smaller and dispersed sites are less likely to be able to incorporate sustainable energy, water and transport systems.
3. Negative effects on agricultural land and rural landscapes but would protect townscapes/landscapes in urban areas.
4. Negative effects on economy because rural dispersal not supported by inward investment; major negative effects on vitality of city/town centres if development directed away.
5. Uncertainties for communities as smaller developers less able to include developer contributions towards green space and other benefits.
6. Less positive and uncertain effects for housing since rural dispersal unlikely to be able to provide the required range of housing types and tenures.
7. Overall, the strategic option for distributing development through rural dispersal has many negative and uncertain effects; it is unlikely to be able to provide the range & need of housing and therefore cannot progress sustainable development.

C: SIGNIFICANT EXPANSION(S) OR NEW SETTLEMENT(S) Urban Areas for Gloucester, Cheltenham & Tewkesbury 32%; Extensions at Urban Edges 0%; rural area 5%; Major Expansions, New Settlements 63%				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The scale of major expansions or new settlements can have inherent negative effects through loss of biodiversity but the significance depends upon the extent, condition & sensitivity of the land take, together with the opportunities for mitigation & enhancement. The scale of major development can provide greater potential for ambitious green infrastructure projects (see also interconnected SA Objectives on climate change adaptation (3), flooding (4), cycling/walking (8), health/well-being (12, 14), & green space (16) through developer contributions as part of a wider GI strategy & including creation of new habitats & linkages. The amount of land designated as Local Nature Reserves is increasing (NE data)³¹ & the need to protect this, as well as nationally important biodiversity, is likely to limit opportunities for new	+? --?	Land-take and negative effects on biodiversity are likely to be a key factor in limiting any availability of land in the JCS area for major expansion or a new settlement (and see SA Objectives No 5 & 6 natural environment and No 16 Green Space). If land and a promoter were to be identified within the timescale of the plan, careful strategic & detailed masterplanning would be needed to meet with the NPPF requirements for creating, protecting, enhancing & managing networks of biodiversity & GI (para 114).

³¹ Baseline Update August 2012

		expansions/settlements. The JCS area is rich in environmental assets & constraints analysis ³² indicates that it would be difficult to find space for a large expansion or new settlement. Significance depends upon site location, DM policies, and careful creative planning briefs & masterplanning. Significance is uncertain and more information is needed.		
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	Major expansions & new settlements can offer the greatest potential for decentralised & renewable energy sources to support a zero carbon approach with major positive effects in the mid to longer term. Bio-energy schemes are unlikely to be sustainable in the JCS area since production methods would have major negative effects on landscapes & biodiversity. Such major new expansion or a new settlement can also better offer energy & emissions efficiencies through high standards of sustainable construction & operation with economies of scale – positive effects are likely to be more significant. Potential positive effects will need to be ensured through strong development management policies, creative planning briefs and masterplanning.	+? -?	Type & scale of potential energy renewables depends upon specific site location; negative visual impacts may be difficult to mitigate (and see SA Objective No 5). Significance is uncertain and more detailed information would be needed on likely scale & location of a major settlement, if potential space is actually possible.
3	CLIMATE CHANGE ADAPTATION	The JCS area has unique water management characteristics with complex river basin planning ³³ including rivers and the Gloucester & Sharpness	++? -?	Potential positive effects will need to be ensured, & negative effects mitigated, through strong development

³² <http://www.gct-jcs.org/Documents/EvidenceBase/JCSBroadLocationReportwAppendixOne.pdf>

³³ Environment Agency, 2009 Severn River Basin Management Plan <http://www.environment-agency.gov.uk/research/planning/124941.aspx>

	Adapt to the consequences of climate change	Canal. Increasing levels of abstraction are placing pressures on water resources³⁴ although generally the RBMP indicates that surface water quality is improving. The scale of major expansions & new settlements has the potential for major negative effects on climate change adaptation through increased surfacewater run-off. However, the scale of development also offers the greatest potential for integrating SUDS and thus mitigating negative effects. Uncertainty associated with site location & development details. Flooding is assessed by the following SA Objective No 4. However, it is important that water management is planned in an integrated and holistic way covering all its functions & services.		management policies, creative planning briefs and masterplanning.
4	FLOODING Manage and reduce flood risk and surface water run-off	The importance of the water environment to the JCS area has been noted at the national³⁵ level through flooding, particularly in the Tewkesbury area. The Strategic Flood Risk Assessments³⁶ indicate that an increase in flood extent & depth is expected. SA comments for SUDS as for SA 3 adapting to climate change above. Major positive effects could be possible with larger new settlements that reach thresholds for optimising SUDS possibilities – depends on location & land take. Uncertainty and	+?	Uncertainty since significance depends on site location and other factors such as viability/deliverability. If a new settlement could be physically located in the JCS area (although this seems unlikely with assets and constraints mapping and analysis), it is recommended that consideration is given to requiring water neutrality from the development in order to avoid additional pressure on flooding capacities and to better promote

³⁴ Water Resource Management Plan (Severn Trent Water, 2010)

³⁵ For example - <http://www.bbc.co.uk/news/uk-england-gloucestershire-20493034>

³⁶ Halcrow - SFRA Level 1 (Sept 2008) and SFRA Level 2 (Oct, 2012)

		more information is needed. The scale of major expansions & new settlements has the greatest potential for maximising water collection opportunities & progressing to water neutral³⁷ developments.		sustainable water management.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	All new development can be of high quality & locally distinctive – dependent on development management policies; also designed & managed to improve water quality, where applicable. The scale of major expansions & new settlements has the greater potential for maximising water collection opportunities & progressing to water neutral developments thus protecting water quality. However, this scale also has the greatest potential for negative effects on protected landscapes & local characters and their settings. About 20% of Cheltenham & about 30% of Tewkesbury Boroughs are within the Cotswold AONB³⁸ which is important for protecting the unique character & setting for the JCS area. Physical and environmental constraints in the JCS area indicate that in order to maximise accessibility (M5), such large new development would be on greenfield and within the AONB with potential major negative effects on landscape.	-	Mitigation possibilities are uncertain & dependent upon size, layout of proposed new settlement, sensitivity of receiving location; more information is needed. Doubt over physical possibilities to accommodate a new settlement due to assets and constraints in the JCS area.

³⁷ For example, see proposals in the Thames Gateway <http://www.environment-agency.gov.uk/research/planning/109024.aspx>

³⁸ <http://www.cotswoldsaonb.org.uk/?page=InteractiveMap>

6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and greenfield land through good design	The scale of major expansions & new settlements has the greater potential for maximising water collection opportunities & progressing to water neutral developments, thus minimising water resource use. This scale of development will be in greenfield land (and see above SA Objective No 5 Natural Resource Quality) with potentially greater negative effects from loss of soil. About 15% of Cheltenham and about 15% of Tewkesbury Boroughs are within the Green Belt, which is important for preventing coalescence of urban areas and helping to retain distinctive characters & settings. A review of the Green Belt³⁹ has confirmed 8 strategic areas that make contributions to the Green Belt and 3 strategic areas that only make a limited contribution; a number of additional strategic areas were suggested. This may further constrain opportunities for major expansion or new settlement with negative effects for the use of natural resources.	+? --	Some uncertainty since mitigation possibilities depend on development proposals and site locations.
				Scale of a new settlement would make it difficult to mitigate negative effects on the Green Belt and associated quality of life for existing communities.
7	HISTORIC ENVIRONMENT	All new development can promote good design that enhances the public realm and this is dependent upon strong DM policies.	?	Mitigation of negative effects on the historic environment is difficult as heritage assets & their settings cannot be replaced

³⁹ Amec for GCT JCS, 2011 Green Belt Boundary Review

	Protect and enhance the area's distinctive historic environment	Major expansion or new settlement will reduce pressures on those urban areas with their rich heritage assets & settings from the potential negative & positive effects of new development. The scale of a major expansion or new settlement can provide opportunities for mitigating any negative effects through careful & creative masterplanning. However, the scale can also have more significant effects – particularly negatively on heritage settings. Nature & significance of effects uncertain – dependent upon DM policies & site locations.		or recreated.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	30% of Gloucester & Cheltenham residents have 2+ cars⁴⁰, which is similar to the national average at 29.47%, whilst Tewkesbury has higher at 40% & reflects the rural nature of the district. A major expansion or new settlement would take pressure off existing systems but unlikely to contribute to improving current transport. The scale of major expansions & new settlements can provide opportunities for reducing the use of high carbon modes of transport & optimising cycling, walking & public transport. This scale of development can be sufficient to reach a threshold above which public transport is provided; careful masterplanning with effective consultation can optimise cycling & walking. This Includes linkages & improvements to a GI Network	+	Longer term positive effects if major expansion or new settlement could be viable with physical space & a promoter found; sustainable transport would need to be clearly required as part of masterplanning and effectively implemented through subsequent monitoring.

⁴⁰ ONS Census 2001

		as part of overall GI Strategy (and see also interconnected SA objectives for biodiversity, climate change, flooding & health/well-being). Services, leisure and amenities are likely to be provided as part of such major development - & reducing the need to travel. Nature & significance of positive effects uncertain – dependent upon DM policies, site size, locations & provision of jobs, but potential positive effects in the longer term.		
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The scale of major expansions & new settlements can provide opportunities for sustainable waste management, including composting.	+?	Light and noise pollution can be mitigated by good design through strong DM policies, and during construction by appropriate EMPs.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The scale of major expansions & new settlements can provide opportunities for encouraging inward investment & new jobs – in the longer term. Provision of services & associated employment in new settlements reduces the potential for positive effects on existing businesses and will have negative effects for inward investment (and associated indirect positive on other SA objectives such as health) for Cheltenham, Gloucester & Tewkesbury; such effects from competing investment will have cumulative negative effects on the city & towns over the longer term. However, the status of a new settlement could provide opportunities to attract employment that is not available elsewhere in the area or the UK.	-?	Significance is uncertain & depends upon viability, deliverability & other economic factors, including promotion by a developer. In the absence of any known likely inward investment or a major promoter at this time, it is unlikely that this is a viable alternative with regard to employment & economic resilience.

11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Potential major negative effects on vitality & viability of Gloucester, Cheltenham & Tewkesbury if new development is directed to a new settlement or major extensions. Significance uncertain but could be major in the longer term.	--	
		All new development can be of high quality & enhance the public realm – dependent on strong development management policies, specific site locations, creative briefs & masterplanning.		
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	All new development can reduce inequalities through good design – dependent upon strong DM policies for design and accessibility. Uncertainty as depends upon type, size, location & sensitivity of receiving communities.		
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	All new development can reduce crime & fear of crime through good design – dependent upon strong DM policies for design and accessibility. It may be easier to design & integrate crime free developments in a major extension or new settlement; however this will not help alleviate existing problems in the urban areas. Uncertainty as depends upon type, size, location & sensitivity of receiving communities.	+	
			-	
14	HEALTH	The scale of major expansions & new settlements can provide positive opportunities for accessibility to health facilities, cycling/walking, and	+	Improvements to accessibility can be ensured through strong & clear DM policies, and careful creative briefs &

	Improve access to health facilities and promote healthy	open/green spaces (see also SA objectives on transport & green space); only likely in the longer term. The focus on new major expansion or settlement will have negative effects by not contributing to improving accessibility to green & open space in the existing urban areas and edges. Uncertainty.		masterplanning; significance depends upon site location.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The scale of major expansions & new settlements can provide opportunities for a range & mix of housing to meet different & flexible needs with positive effects in the longer term. This can be secured through strong DM policies & careful masterplanning. Significance depends upon site location & economic factors (see also SA No 10 economy) – uncertainty.	+	Unlikely to be viable within the lifetime of the plan as no major promoters identified at this time.
			?	
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The scale of major development can provide greater potential for ambitious green infrastructure projects through developer contributions as part of a wider GI strategy & including enhanced accessibility to open/green space. The focus on major expansion and/or a new settlement would have indirect negative effects on existing urban areas by limiting possibilities for maintaining/improving GI at the urban edges. Significance depends upon site location, DM policies, planning briefs, developer proposals, and	+	
			-	

		careful creative masterplanning. Significance uncertain and more information on likely scale & location of any major expansion or new settlement, if possible, needed.		
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The scale of major expansions & new settlements can provide opportunities for accessibility to educational facilities. Significance depends on site locations, strong DM policies, and careful masterplanning. Uncertainty as there could be negative effects on existing educational services through competition, although new settlement could offer unique possibilities not available elsewhere – however, unlikely in timescale of the plan.	?	
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The scale of major expansions & new settlements can provide opportunities for enhancing & providing new cultural & tourism facilities - depends upon site location & developer proposals. However, potentially negative effects on the established cultural attributes of the urban areas through conflict/competition; no major promoter at the current time so viability may be unlikely & significance overall is uncertain.	?	

Summary of Key Negative & Positive Effects for Sustainable Development:

1. Major expansion and/or new settlement could have major positive effects for climate change adaptation & mitigation, flooding and sustainable construction & operation since the scale of development offers thresholds for energy, emissions and resources use efficiencies in implementation, including opportunities for zero carbon and zero water use, together with low carbon forms of transport and access – cumulative effects particularly in the longer term.
2. The scale of such development indicates negative effects on soils, landscape, green/open space; major constraints of Green Belt and AONB; likely negative (maybe some positive effects in longer term) on biodiversity especially in short term.
3. Uncertainty for socio-economic factors; potential positive effects since scale can provide opportunities, including new unique investment) but major negative effects on vitality & viability of existing city & town centres through introduction of a new competitor centre, likely negative effects on economic resilience & communities of existing settlements, difficulties of integrating new communities.
4. Potentially major positive effects for housing since the scale could provide the range of type, size & tenure with flexibility – but uncertainty since unlikely to meet the need within the timescale of the JCS.
5. Overall, this strategic option of distributing development through a major expansion and/or new settlement could have both major positive and negative effects; however, there was also considerable uncertainty. Constraints & assets analysis indicates that no sustainable location for a major expansion and/or new settlement could be found within the JCS area which would not have significant negative effects on the Green Belt and/or the AONB, or damage the social and economic viability of existing settlements. No promoters have indicated any interest. It is unlikely that a major expansion or new settlement could not be viable or deliverable within the timescale of the JCS. Accordingly, this option for distributing development is not realistic or sustainable for development.

Appendix VIII: (a) SA of Potential Strategic Allocations & Non-JCS Sites for Gloucester

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
--	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
-	+	The SA Objectives 5, 6, 9, 13 and 14 consider more than one topic and as a result the plan could have different effects upon each topic considered. For example, Objective 6 includes a number of topics including soils, previously developed land, water use and Green Belt. A site/ policy within the plan could have a negative effect on the topic Green Belt but also have a positive effect on previously developed land and therefore this could lead to two symbols being shown.

Summary SA

	Sustainability Objectives																						
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism					
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18					
Gloucester																							
Innsworth G1 Option 1 Description: H=55.7 ha,1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	++	+	+	++	-	-	○ ?	+	+	-	++	++	++	?	++	++	++	++	○				
Innsworth G1 Option 2 Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	+	?	+	?	+	+	?	-	-	○ ?	+	?	-	++	++	++	?	++	++	+	?	++	○
Gloucestershire																							
Gloucestershire Airport G2 Option 1 Description: H=33.5 ha, 850 dwellings; new vehicular access from	++	+	+	++	-	-	○ ?	+	+	-	○	?	++	+	?	+	++	+	++	○			

	Sustainability Objectives																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic		Transport		Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety		Health	Housing	Green Space	Education & Skills	Culture & Tourism																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
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B4063; adjacent to Gloucestershire Airport																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
Gloucestershire Airport G2 Option 2 Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North	++	+	+	++	-	-	○	?	+	?	-	++	++	++	+	?	+	++	+	++	○																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
Gloucestershire Airport G2 Option 3 Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South	++	+	+	++	-	-	○	?	+	?	-	++	++	++	+	?	+	++	+	++	○																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
Gloucestershire Airport G2 Option 4	++	+	?	+	+	?	-	--	○	?	+	?	-	+	?	++	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++	+	?	++

	Sustainability Objectives																									
	Biodiversity		Climate – Mitigation		Climate – Adaptation	Flooding		Resources, landscape	Resources, soil, water	Historic		Transport		Waste, Pollution	Economy		City, town centres	Communities – equalities	Communities – safety	Health		Housing	Green Space		Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18								
Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.																										
North East Gloucester G3 Option 1 Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension	++	+	+	○	-	-	+	?	+	?	-	++	++	++	?	++	++	+	?	○						
North East Gloucester G3	++	+	+	○	-	-	○	?	+	?	-	++	++	++	?	++	++	-	?	○						

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy
Sustainability (Integrated) Appraisal Report: Appendix VIII (a) Potential Strategic Allocations & Non-JCS Sites for Gloucester

	Sustainability Objectives																					
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic		Transport		Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18				
Option 2 Description: H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension																						
Brockworth G4 Option 1 Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way	++	+	+	++	-	-	+	-	+	?	-	++	+	++	?	+	?	++	+	?	++	O
Brockworth G4 Option 2 Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	++	+	+	++	-	-	+	-	+	?	-	O	+	++	?	+	?	++	+	?	++	O
Highnam G8 Option 1 Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new	++	+	+	O	-	-	-	+	-	+	?	-	++	-	++	?	+	?	++	+	++	O

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy
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	Sustainability Objectives																			
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic		Transport		Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18		
community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.																				
Highnam G8 Option 2 Description: 265 dwellings (12 ha)	++	+	+	○	-	-	○ ?	- ?	-	○	-	○	○	○	○	++	○	○	○	
South of Churchdown G9 Option 1 Description: H= 192 dwellings (8.7 ha)	++	+	+	++	-	-	○ ?	+	?	-	○	++	○	○	○	++	+	++	○	
South of Churchdown G9 Option 2 Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads	+	+	+	++	-	-	○ ?	+	?	-	○	++	++	?	+	++	○	++	○	
Churchdown G3 & G9 Option 1 Description: H= 434 dwellings (19.7 ha); new	++	+	+	++	-	+	- ○ ?	+	?	-	++	++	+	?	++	++	+	+	○	

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy

Sustainability (Integrated) Appraisal Report: Appendix VIII (a) Potential Strategic Allocations & Non-JCS Sites for Gloucester

	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need																		
Churchdown G3 & G9 Option 2 Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	++	+	+	++	-	+	○	+	-	++	++	+	?	++	++	++	+	○
Non-JCS Sites																		
Land at Brookthorpe/Whaddon ≈ 420 ha of housing (approximately 3000	++	+	+	-	○	-	○	-	○	?	+	?	-	?	+	++	+	○

	Sustainability Objectives																							
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18						
dwelling(s)																								
Land at Hardwicke ≈ 112 ha of housing (approximately 1000 dwelling(s))	+ +	?	+	+	- -	○	+	-	+	-	○	?	+	?	-	?	-	+	?	+	++	+	+	○

Each of the options for the potential strategic allocations/ urban extensions and Non-JCS sites were assessed taking into account mitigation provided through an emerging draft of Policy SA1 Requirements for Strategic Allocations. The SA of the options and the early draft of Policy SA1 indicated general recommendations from the SA and are applicable to all the strategic allocations as follows:

A number of recommendations have been suggested by the SA which is applicable to all of the Allocations. These recommendations if implemented could improve the certainty of positive effects or provide mitigation for negative effects. These include:

- Consideration should be given to inserting a requirement to implement a (Sustainability) Environmental Management Plan (S/EMP) to reduce, in particular, short-term effects during construction with regard to but not limited to: noise, air quality, light, transport, waste, and use of natural resources; and to include provision for monitoring.
- It is recommended that wording be inserted into the policy to require that at least Phase 1 Habitat Survey is undertaken on each site prior to development to identify the potential for protected species.
- A landscape buffer around species rich hedgerows should be inserted which could be drawn onto the proposals maps for all strategic allocations. This will create a fragmented edge to ensure that hedgerows do not form part of a garden of a dwelling house; therefore this eliminates the risk of their removal.
- Consideration should be given to inserting wording to require development (other than housing) to meet the BREEAM standard 'very good' or above.
- Consideration should be given to increasing the minimum percentage (above 10%) of established or emerging low carbon or renewable technologies of onsite energy requirements per building. It is assumed that the 10% figure came from a requirement to implement the Merton

	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
	Rule under PPS 1 and there may be scope to increase the figure now. Under the Planning and Energy Act 2008, LPAs may impose reasonable requirements for (a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; and (b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development. ■ In addition, it is recommended that wording is inserted to require development to comply with energy efficiency standards that exceed the energy requirements of building regulations. A standard that is reasonably should be established. ■ It is suggested that the historic environment & assets in the JCS area are so important that there should be a separate requirement; it should also include mitigation of significant adverse effects on the settings of heritage features and direct effects on archaeology. ■ Consideration should be given to inserting a requirement for measures to ensure equality of access to facilities and services including transport, to improve certainty of positive effects. ■ Consideration should be given to inserting a requirement for design to take account of the Safer Places: The Planning System and Crime Prevention Guidance (September 2004), to prevent crime. ■ It is suggested that details for encouraging people to use open space should be included in detailed masterplanning through signage & information etc. ■ It is assumed that the GI Framework for the JCS area will include principles for GI and strategic areas for creating and linking GI. It will be important to include provision for longer term management of such GI, perhaps through various funding mechanisms and/or community/residents groups. If not already included in the GI Framework it is recommended that this is specified. ■ If not already considered, it is recommended that the GI Framework should include the potential for provision of allotment gardens for local food production.																	

SA of Potential Strategic Allocation Innsworth G1

Potential Strategic Allocation Innsworth G1						
Sustainability Appraisal Objective		Assessment of Effects				
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
		Option 1		Option 2		
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities		
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no internationally protected habitats ¹ on or adjacent to the site although there is one nationally protected area Innsworth Meadow – as a SSSI and Priority BAP ² Habitat for lowland meadow (condition - recovering favourable). Therefore no significant negative effects on protected biodiversity. There is some 40-50% overlap by area with this meadowland In the NW corner of the proposed housing with potential negative effects but also potential positive effects if the meadowland could be improved as part of the masterplanning. Specific requirements for enhancements to SSSI will have major positive effects for biodiversity.		++	Option 2 is the same as Option 1 and includes additional potential housing (+2084 dwellings) to the north of the GI corridor indicated for the Hatherley Brook.	++ ?
		There are no LNRs in the area (see SA Objective			The absence of effects on any internationally protected biodiversity is the same as Option 1. The increase in size of more than doubling the housing allocation could cause risk of pressure on potentially conflicting uses for the GI – increased access for recreational use and improved habitat for biodiversity – so some uncertainty until further detailed project level studies are undertaken. SA Objective No 16 Green Space covers these issues.	

¹ Defra (2013) Magic – Statutory Rural Designations - <http://magic.defra.gov.uk> [accessed September 2013]

² Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk> (accessed September 2013)

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	Option 1		Option 2	
	Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
	No 16 Green Space). A strong area of GI following the valleys of the Hatherley and Horsbere Brooks is indicated on the proposals map. There are possibilities for very positive effects by enhancing the protected lowland meadow with improved connectivity to a wider managed floodplain habitat –both in the short and longer terms. Specific requirements for new GI along the Hatherley Brook to be actively managed for biodiversity purposes will have major positive effects. The effectiveness of such enhancement will be dependent upon the implementation of SA 1 (Strategic allocations) and other Core Policies together with clear planning briefs and masterplanning. The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also			

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	Option 1			Option 2		
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	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester			Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		
	provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment.					
2	CLIMATE CHANGE MITIGATION	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to lead to minor positive effects in the long-term on climate change mitigation.		+	As for Option 1 plus the additional scale of major development may better reach thresholds for carbon neutrality and/or provision of energy to National Grid.	
	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote				++ ?

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		Option 1		Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
		possibilities for delivery of climate change mitigation.			
3	CLIMATE CHANGE ADAPTATION	The requirements for improving flood storage capacities will contribute to positive effects for	+	As for Option 1 – higher quantum of development places additional pressures	+

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		Option 1		Option 2		
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities		
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		
	Adapt to the consequences of climate change	climate change adaptation (and see SA Objective No. 4 Flooding following). The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS. Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. As a result, the effects on climate change adaptation are expected to be minor positive.		on flood capacities but could be mitigated by aiming for water neutral development (see SA Objective No. 4 below).		
4	FLOODING	Both the Hatherley and Horsebere Brooks are subject to flooding (Zone 2 and 3) ³ . The strategic	++	Same as Option 1. The higher quantum of development proposed will create higher	++	?

³ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
	Manage and reduce flood risk and surface water run-off	site allocation proposes development outside the flood zones and GI in the flood zones thus reducing flood risk. The requirement for flood storage betterment across the site in line with SFRA2⁴ to improve the capacity of the floodplain upstream of Longford will have wider positive effects for flood risk management. Emerging Policy SA 1 requires development to provide phased SUDS and this will have positive effects in short to long-term.		demands on flooding capacities with less certain major positive effects. However, any potential issues could be mitigated through reducing surface water run-off by aiming for water neutral development.	
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	Flood storage betterment is required and enhancements to the SSSI meadowland through improved connectivity to the wider managed	-	Same as Option 1. The higher quantum of development proposed will place greater pressure on the receiving environment but	-

⁴ Halcrow Group Ltd (July 2012) Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Strategic Flood Risk Assessment for Local Development Framework Level 2. Online at <http://www.gct-jcs.org/EvidenceBase/StrategicFloodRiskAssessment.aspx> [Accessed September 2013]

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Sustainability Appraisal Objective		Assessment of Effects		
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		Option 1	Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
Protect and improve the quality of natural resources including soil, water and landscape		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester
		floodplain habitat with new GI linkages to be actively managed for biodiversity – all this will have positive effects generally but the policy wording does not explicitly mention water quality. The site lies within a drinking water protected area which is identified as being 'probably at risk' and lies on a minor aquifer which is considered to be of high vulnerability. ⁵ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction. The area is not in or adjacent to any landscape designations and is described as suburban ⁶ and being in an area of medium - low sensitivity landscape ⁷ . Therefore the effects of the development are unlikely to be significant and	it is not a sensitive landscape and mitigation is likely to be as effective as Option 1 since the additional housing to the north would be well connected to existing housing adjacent to the A38.	

⁵ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

⁶ Defra 2013) Magic – Landscape <http://magic.defra.gov.uk> [accessed September 2013]

⁷ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (draft).

Potential Strategic Allocation Innsworth G1					
Sustainability Appraisal Objective		Assessment of Effects			
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		Option 1		Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
		the landscape could be replaced or substituted – or improved. Emerging Policy SA 1 requires a fragmented development edge where practical and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of Core Policies and details of planning brief and masterplanning.			
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	There will be loss of soils (lime-rich loamy and clayey soils with impeded drainage) but the land is not classified ⁸ as important agricultural land (grade 2 and 3) and such loss is of minor significance. As mentioned previously, the site lies within a drinking water protected area which is identified as being 'probably at risk.' ⁹ Development could have minor negative effects on water use through potential for increased demand from	-	Same as Option 1. The higher quantum of development proposed will place greater pressure on the receiving environment with uncertain negative effects for the Green Belt and the setting, although the proposed GI will act as a landscape buffer; uncertainty as depends upon details of planning brief and masterplanning.	-

⁸ Defra 2013) Magic – Agricultural Land Classification <http://magic.defra.gov.uk> [accessed September 2013]

⁹ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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Sustainability Appraisal Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	Option 1		Option 2	
	Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
	new residential and community facilities. The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning. The strategic site is situated on Greenfield land in the Green Belt but is considered to contribute less than other areas as identified in the Green Belt Review¹⁰. Therefore the potential major negative effects on setting are less, the proposed GI will act as a landscape buffer; uncertainty as depends upon details of planning brief and masterplanning.			

¹⁰ Green Belt Review (2011) <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf> (accessed September 2013)

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		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
		Option 1				Option 2			
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities				Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities			
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester				Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester			
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	Gloucester has a rich, important and distinctive historic heritage and environment. There are no conservation areas, listed buildings or scheduled monuments on or adjacent to the allocation site ¹¹ . In addition, protection for the historic environment is provided in the wording of emerging Policy SA 1; thus effects are likely to be neutral. However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.				As for Option 1.			
8	SUSTAINABLE TRANSPORT Improve accessibility,	The potential allocation has a network of footpaths which could be enhanced as part of an overall sustainable transport plan for the site.				Option 2 is the same as Option 1 and includes additional potential housing (+2084 dwellings) to the north of the G1			

¹¹ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

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		Option 1		Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
maximise the use of sustainable modes of transport and reduce the need to travel by the private car		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
		These paths could provide good linkages to, and improvements to, existing public transport facilities on the A38 and A40 for commuting into the city thus reducing the need to travel by high carbon modes of transport. This should be secured through emerging Policy SA 1 C7 i - v which require high quality passenger transport links, safe and convenient pedestrian and cycle routes within and adjoining the development. The urban extension here provides good opportunities to link from the rest of the city and to the wider countryside. The TA required by emerging Policy SA 1 E ii should make clear how cycleways can be integrated with the existing footpaths to avoid conflict and promote sustainable travel. Some uncertainty as depends upon implementation of details to be agreed at masterplanning/project level studies. Given the size of the allocation and although there are no known traffic and transport issues, it		corridor indicated for the Hatherley Brook. The increase in size of more than doubling the housing allocation could cause risk of pressure on existing transport capacities with negative effects or could provide thresholds above which more sustainable transport modes are more readily implemented - therefore some uncertainty but overall positive effects.	

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		Option 1		Option 2	
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		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
		is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure and under E General with the requirement to submit a Transport Assessment.			
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	Given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place in the long-term only through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under emerging Policy SA 1 E General 22 vi. Air, light and noise pollution are likely to increase – particularly during the construction phases in the shorter term. This may affect the residential	-	As for Option 1 but the higher quantum of development will create more waste and pollution to be mitigated.	-

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		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
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		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
		areas to the South East and East of the proposed strategic site. Mitigation is provided by the requirement in emerging Policy SA 1 E General 22 I, ii, iii for masterplanning.			
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The provision of 9 ha of employment land, especially in a location close to good access and transport and housing, will have major positive effects on objectives for economic sustainability.	++	As for Option 1. In addition the provision of an extra school and another local centre will provide extra job opportunities.	++
11	CITY AND TOWN CENTRES	The urban extension approach with a strategic site providing both housing and employment land at the edge of the city (within 3.2 km) with	++	As for Option 1.	++

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		Option 1		Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
		good transport into the centre will support the vitality and viability of the city centre with major positive effects.			
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective numbers 8 Transport 14 Health and 15 Housing). The urban extension approach provides a scale at which high quality design and accessibility for all should be more deliverable and certain. Option 1 includes a site for Gypsies/Travellers and Extra Care Facilities with major positive effects. Care will be needed during masterplanning to ensure that this is sited to minimise any adverse effects for integration with new and existing	++	As for Option 1. The higher quantum of development could reach a threshold at which inequalities are even less – and this Option 2 includes for 2 no sites for Gypsy/Traveller and Extra Care Facilities with major positive effects.	++

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	Option 1		Option 2		
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	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		
	communities.				
13 SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain - depends on design and layout details in planning briefs and masterplanning.	?	As for Option 1.	?	
14 HEALTH Improve access to health facilities and promote healthy	The opportunities for improved accessibility to green space as part of wider GI network, including footpaths and the Gloucestershire Way, long distance path, will have positive effects on health. The allocation also includes extra care facilities leading to long-term positive effects on health.	++	As for Option 1 although it includes additional potential housing (+2084 dwellings) to the north of the GI corridor indicated for the Hatherley Brook. Provision for 2 primary schools and children's centres are made to address the higher quantum of housing.	++	

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		Option 1		Option 2	
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		The potential site includes local primary school and children's centre; sustainability could be enhanced if such facilities could provide other uses, especially for older children/young adults in the evening, and/or local doctor/nurse attendance. The site is not within walking of health care facilities although in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services. Despite local health facilities not being specified, it is assumed that this is a consideration.			
15	HOUSING	Major positive effects for contributing to the locally identified need for housing ¹² , including affordable housing and 1 no Gypsy/Traveller and		++	Same as Option 2. The higher quantum of housing may enable wider range of tenure and type to be delivered. ++

¹² Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [Accessed July 2013]

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	Ensure everyone has access to a decent home that they can afford and meets their needs	Extra Care site. The scale of the allocation should enable a good range of type and tenure with flexibility for changing needs over time with long term cumulative positive effects – details depend on planning brief and masterplanning. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing and that sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. This will have major long-term positive effects on housing.				
16	GREEN SPACE	There are 5 footpaths crossing the potential site and linking to the Gloucestershire Way, a long	++	Option 2 is the same as Option 1 and includes additional potential housing	++	?

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		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1- Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
	Create, enhance, protect, connect and improve access to open spaces	distance route between Tewkesbury and Chepstow. Accessibility will be enhanced through the improvement to the GI network – if implemented through emerging Policy SA 1 7 v and other Core Policies. The potential site includes possibilities for enhancing access from the existing housing to the SE.		(+1539 dwellings) to the north of the GI corridor indicated for the Hatherley Brook. The potential site includes possibilities for enhancing access from the existing housing to the SE and the N/NE. The increase in size of more than doubling the housing allocation could cause risk of pressure on potentially conflicting uses for the GI – increased access for recreational use and improved habitat for biodiversity – so some uncertainty until further detailed project level studies are undertaken.	
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The urban extension approach with easy accessibility from the edge to the city centre will support existing educational services. Provision of a primary school is a requirement of the proposals so there will be no adverse effects through overloading capacity of existing schools.	++	As for Option 1 – 2 primary schools required to accommodate the additional schoolchildren from the higher quantum of housing.	++

Potential Strategic Allocation Innsworth G1					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	There are no cultural heritage or tourism assets on or adjacent to the site which are likely to be affected, so the effects are likely to be neutral.	○	No cultural heritage or tourism assets are located on the site. There is however, an art gallery in Twigworth adjacent to the northern part of the site next to the A38. The increase in residential dwellings could benefit the asset although there are unlikely to be any significant effects.	○

Potential Strategic Allocation Innsworth G1		
Sustainability Appraisal Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
	Option 1	Option 2
	Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities
	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester
Summary of Key Negative and Positive Effects for Sustainable Development: The Options are located on a parcel of Land to the north of the City of Gloucester, adjacent to Innsworth. Both Options support the SA objectives of Climate change adaptation and Transport, with uncertainty of effects on Historic environment and Sustainable communities – safety. There is potential for minor negative effects on the SA objectives of Resources – use and quality and Waste and pollution, given the location of the Options on Greenfield land in the green belt, being located in a groundwater drinking water protected area and the scale of the development proposed in each Option.		
Key Negative Effects: No significant negative environmental effects have been identified.		
Key Positive Effects: - Both allocations are likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Flooding; The economy; City and town centres; Sustainable communities - equality and well being; Health; Housing; Green Space; and Education and skills. - Option 1 is more likely to have significant positive effects with regard to transport than Option 2 as the increase in size of more than doubling the housing allocation could cause risk of pressure on existing transport capacities. - The greater quantum of development in Option 2 may better reach thresholds for carbon neutrality and/or provision of energy to National Grid and therefore may have significant positive effects on the SA objective of climate change adaptation compared to Option 1.		
Mitigation, Recommendations and Residual Effects for Plan-making		

Potential Strategic Allocation Innsworth G1		
Sustainability Appraisal Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
	Option 1	Option 2
	Description: H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	Description: H= 138.4 ha, 3075 dwellings; E= 9 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities
	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester
Initial findings of the HRA screening have found that the site is over 7km from the Cotswold Beechwoods SAC so unlikely to have a significant effect alone. The site has two brooks (Hatherley and Horsbere Brooks) running through it that eventually flow into the River Severn SAC/ SPA/ Ramsar and Walmore Common SPA/Ramsar 1 km. Therefore, there is the potential for impacts alone on water quality. The Brooks flowing through the site should be protected and retained and any proposal for development should ensure that impacts on water quality and resources are minimised.		

SA of Potential Strategic Allocation Gloucestershire Airport G2

Potential Strategic Allocation Gloucestershire Airport G2								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
1 Biodiversity	There are no internationally or nationally protected habitats ¹³ in or adjacent to the area. There is one BAP Priority Habitat for traditional orchard ¹⁴ in the northern corner adjacent to the Gloucestershire Way/Normans Brook and B4063. This habitat is within the area proposed as landscape buffer/GI and will		As for Option 1 – no change in effects from additional employment land proposed at northern edge of airport area adjacent to existing commercial area.		As for Option 1 – no change in effects from additional employment land proposed at northern edge of airport area adjacent to existing commercial area; and to southern area adjacent to A40 and		As for Option 1 plus significant increase in scale of mixed use development over airport area. The scale of additional development may result in additional recreational pressures on the GI but unlikely to lessen the positive effects	
	++		++		++		++	

¹³ Defra (2013) Magic – Statutory Rural Designations - <http://magic.defra.gov.uk> [accessed September 2013]

¹⁴ Natural England (2013) – Nature on the Map BAP Priority Habitats <http://www.natureonthemap.naturalengland.org.uk> [accessed September 2013]

Potential Strategic Allocation Gloucestershire Airport G2

SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	thus be protected from development. Therefore no significant negative effects on protected biodiversity. There are no LNRs (see SA Objective No 16 Green Space) in or adjacent to the site area. Specific requirements for new GI along the Normans Brook to be actively managed for biodiversity purposes will have major positive effects. The effectiveness of such enhancement will be				existing commercial area.		from enhanced biodiversity GI at Normans Brook.	

Potential Strategic Allocation Gloucestershire Airport G2

SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	dependent upon the implementation of emerging Policy SA 1 (Strategic allocations) and other Core Policies together with clear planning briefs and masterplanning. The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D							

Potential Strategic Allocation Gloucestershire Airport G2									
SA No	Assessment of Effects								
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making								
	Option 1		Option 2		Option 3		Option 4		
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.		
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		
2 Climate change Mitigation	Environment.								
	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A		+	As for Option 1.	+	As for Option 1.	+	As for Option 1 plus the additional scale of major development may better reach thresholds for carbon neutrality and/or provision of energy to National Grid.	++ ?

Potential Strategic Allocation Gloucestershire Airport G2

SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to lead to minor positive effects in the long-term on climate change mitigation. The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.							

Potential Strategic Allocation Gloucestershire Airport G2							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	Option 1		Option 2		Option 3		Option 4
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester
3 Adaptation	The requirements for improving flood storage capacities will contribute to positive effects for climate change adaptation (and see SA Objective No 4	+	As for Option 1.	+	As for Option 1.	+	As for Option 1 plus the additional scale of major development may better reach thresholds for water neutrality.

Potential Strategic Allocation Gloucestershire Airport G2

SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	Flooding following).							
	The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS.							
	Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires							

Potential Strategic Allocation Gloucestershire Airport G2

SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	incorporation of sustainable development principles and sustainable construction methods. As a result, the effects on climate change adaptation are expected to be minor positive.							

Potential Strategic Allocation Gloucestershire Airport G2									
SA No	Assessment of Effects								
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making								
	Option 1		Option 2		Option 3		Option 4		
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4 Flooding	The Hatherley Brook out with the north of the site beyond the B4063 and Normans Brook that forms the NE boundary to housing to the SW of the airport are subject to flooding (Zone 2 and 3) ¹⁵ . The strategic site allocation proposes development outside the flood zones and GI in the flood zones of the Normans Brook thus reducing flood risk. The requirement for flood storage		As for Option 1.		As for Option 1.		As for Option 1 plus the additional scale of major development may better reach thresholds for water neutrality and certainly could optimise possibilities for SUDS; uncertainty as depends on planning brief and masterplanning details.		?

¹⁵ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation Gloucestershire Airport G2

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	Option 1		Option 2		Option 3		Option 4	
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	betterment across the site in line with SFRA2 ¹⁶ to improve the capacity of the floodplain upstream of Longford will have wider positive effects for flood risk management.							
	Emerging Policy SA 1 D18 requires development to provide phased SUDS and this will have positive effects in short to long term.							

¹⁶ Halcrow Group Ltd (July 2012) Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Strategic Flood Risk Assessment for Local Development Framework Level 2. Online at <http://www.gct-jcs.org/EvidenceBase/StrategicFloodRiskAssessment.aspx> [Accessed September 2013]

Potential Strategic Allocation Gloucestershire Airport G2								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
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	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
5 Env Quality	Flood storage betterment is required with new GI linkages to be actively managed for biodiversity – all this will have positive effects generally but the policy wording does not explicitly mention water quality. The site lies within a drinking water protected area which is identified as being 'probably at risk' and lies on a minor aquifer which is considered to be of high vulnerability. ¹⁷ Development could have minor negative	-	As for Option 1. The small area of additional employment land to the north is adjacent to other commercial uses; no sensitive receptors.	-	As for Option 1. The additional employment proposed for land adjacent to the A40 is unlikely to have significant negative effects as no sensitive receptors and with careful design to mitigate any effects identified during detailed LVIA studies at project level.	-	As for Option 1 plus the additional scale of major development is likely to have minor negative effects as development would cover this area that contributes (in small part) to the visual gap between Gloucester and Cheltenham.	-

¹⁷ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation Gloucestershire Airport G2

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	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	effects on groundwater quality from contaminated run-off particularly during construction. The area is not in or adjacent to any landscape designations and adjacent to suburban land ¹⁸ to the NW edge of the city and has been identified as being an area of low landscape sensitivity ¹⁹ . This lower quality landscape character is less sensitive such that the effects of the							

¹⁸ Defra 2013) Magic – Landscape <http://magic.defra.gov.uk> [accessed September 2013]

¹⁹ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (draft).

Potential Strategic Allocation Gloucestershire Airport G2

SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport		Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North		Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South		Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.	
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	development are unlikely to be significant and the landscape could be replaced or substituted – or improved. Emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and details of planning brief and masterplanning. The site is well connected to the residential							

Potential Strategic Allocation Gloucestershire Airport G2								
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	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
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	area at edge of city to the SW and overall landscape effects are likely to be neutral with implementation of the buffer/Gl.							
6 Env Use	There will be loss of soils but the land is not classified ²⁰ as important agricultural land	-	As for Option 1.	-	As for Option 1. The additional employment land is	-	As for Option 1 plus the additional scale of major development is likely to	--

²⁰ Defra 2013) Magic – Agricultural Land Classification <http://magic.defra.gov.uk> [accessed September 2013]

Potential Strategic Allocation Gloucestershire Airport G2

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	Option 1		Option 2		Option 3		Option 4	
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	(grade 1-3) and it is uncertain what the effects of this will be. As mentioned previously, the site lies within a drinking water protected area which is identified as being 'probably at risk.' ²¹ Development could have minor negative effects on water use through potential for increased demand from new residential and community facilities.				well connected to the A40, no sensitive receptors and unlikely to adversely affect the setting any further than Option 1.		have negative effects as development would cover this area that contributes (in small part) to the visual gap between Gloucester and Cheltenham.	

²¹ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation Gloucestershire Airport G2

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	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	Option 1		Option 2		Option 3		Option 4	
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The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning.								
The strategic site is on Greenfield land in the Green Belt and is								

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	Option 1		Option 2		Option 3		Option 4		
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	considered to contribute significantly - as identified in the Greed Belt Review ²² . Therefore there are potential major negative effects on the setting of residential area to the SW; however, mitigation is provided as the proposed GI will act as a landscape buffer to reduce to effects to minor.								
7 Hist oric	Gloucester has a rich, important and distinctive historic heritage	○ ?	As for Option 1.	○ ?	As for Option 1.	○ ?	As for Option 1.	○ ?	

²² Green Belt Review (2011) <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf> (accessed September 2013)

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	Option 1		Option 2		Option 3		Option 4
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	and environment. There are no conservation areas, listed buildings or scheduled monuments on or adjacent to the allocation site ²³ . In addition, protection for the historic environment is provided in the wording of emerging Policy SA 1 D 19; thus effects are likely to be neutral. However, the potential for archaeology is unknown at this stage and there currently is no						

²³ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Potential Strategic Allocation Gloucestershire Airport G2

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	policy to provide protection/mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.							

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8 Trans port	The potential allocation site is bounded at the NE side by a narrow GI and landscape buffer		++	?	As for Option 1.		++	?	
					As for Option 1.		++	?	As for Option 1 plus the additional scale of major development could have
									++ ?

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	adjacent to the Normans Brook and the Gloucestershire Way long distance footpath. Access links by foot path to this and by foot/cycle to the urban area to the SW through the development could be enhanced as part of an overall sustainable transport plan for the site. These could provide good linkages to, and improvements to, existing public transport facilities on the B4063 and A40 (2 transport improvements required thus mitigating any potential adverse effects on capacity) for						negative effects by overloading capacity or existing system or positive effects by providing enhancements; however, provision of transport measures to maximise sustainable transport is a specific requirement of the allocation and provides mitigation and certainty of positive effects.

Potential Strategic Allocation Gloucestershire Airport G2

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	commuting into the city thus reducing the need to travel by high carbon modes of transport. This should be secured through emerging Policy SA 1 C7 i - v which require high quality passenger transport links, safe and convenient pedestrian and cycle routes within and adjoining the development. The urban extension here provides good opportunities to link from the rest of the city and to the wider countryside. The TA required by emerging Policy SA 1							

Potential Strategic Allocation Gloucestershire Airport G2

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	E ii should make clear how cycleways can be integrated with the existing footpaths to avoid conflict and promote sustainable travel. Some uncertainty as depends upon implementation of details to be agreed at masterplanning/project level studies. The site currently has good access to bus stops but it is approximately 4.5 km from Gloucester's city centre and therefore is relatively remote							

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	compared to other allocations. In addition, given the size of the allocation and although there are no known traffic and transport issues, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure and under E General with the requirement to submit a Transport Assessment.							

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9 Waste	Given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under emerging Policy SA 1 E	-	As for Option 1.	-	As for Option 1.	-	As for Option 1 plus the additional scale of major development could increase risk of short term pollution effects during construction phases and would require careful mitigation during detailed project level studies.	-

Potential Strategic Allocation Gloucestershire Airport G2

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	General 22 vi. The site is adjacent to Gloucestershire airport which could have a major effect in terms of noise and light pollution on the new residential development proposed. The site is also adjacent to the A40 which is the main road into Gloucester from the M5. It is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest							

Potential Strategic Allocation Gloucestershire Airport G2									
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	Option 1		Option 2		Option 3		Option 4		
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	appropriate mitigation. Air, light and noise pollution are likely to increase – particularly during the construction phases in the shorter term. This may affect the residential areas adjacent to the site. Mitigation is provided by the requirement in emerging Policy SA 1 E General 22 I, ii, iii for masterplanning.								
10 Econ omy	Neutral effects as no employment land proposed, although housing proposed		○	The provision of 5.2 ha of employment land, especially in a	++	As for Option 2 plus further 20 ha thus comparatively more	++	As for Option 2 plus further 20 ha and additional MU=116.5 ha	++ ?

Potential Strategic Allocation Gloucestershire Airport G2

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	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	
	could help support the existing employment uses.		location close to good access and transport and housing, will have major positive effects on objectives for economic sustainability.		positive effects.		thus comparatively even more positive effects at this side of Gloucester city. Conversely, allocating so much employment land here may have negative effects for allocations elsewhere across the JCS area. In addition uncertainty exists as there is limited information available regarding relative economic sustainability and resilience of current	

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							airport uses to wider JCS area verses alternative uses.	
11 Centres	The allocation is approximately 4.5 km from the centre of Gloucester. It is uncertain	?	The urban extension approach with a strategic site	++	As for Option 2.	++	As for Option 2.	++

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	whether new residents would travel into Gloucester's centre to use services or whether they would use the services closer to them. Capacity of existing services to accommodate any increase closer to the site is unknown.		providing both housing and employment land at the edge of the city with good transport into the centre will support the vitality and viability of the city centre with major positive effects.					
12 Com munit	The allocation could reduce inequalities in wellbeing and opportunity through providing	++	As for Option 1.	++	As for Option 1.	++	As for Option 1.	++

Potential Strategic Allocation Gloucestershire Airport G2

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	Option 1		Option 2		Option 3		Option 4	
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	good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective numbers 8 Transport 14 Health and 15 Housing).							
	The urban extension approach provides a scale at which high quality design and accessibility for all should be more deliverable and certain.							

Potential Strategic Allocation Gloucestershire Airport G2

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13 Safety	Option 1 includes Extra Care Facilities with major positive effects. Care will be needed during masterplanning to ensure that this is sited to minimise any adverse effects for integration with new and existing communities.							
	The allocation could provide an opportunity to reduce crime through range of good quality housing. This will provide attractive places to live and work which people will want to look after and where people will		As for Option 1; provision of employment nearby housing and existing employment may improve the area		As for Option 2.		As for Option 2 but with more certainty of positive effects since the whole area can be planned carefully to reduce crime and make people feel safer – depends upon	

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	feel safe. At present, the effects are considered to be uncertain - depends on design and layout details in planning briefs and masterplanning.		generally as a safe place.				CPs and masterplanning.		
14 Health	The opportunities for improved accessibility to green space as part of wider GI network, including footpaths and the Gloucestershire Way, long distance path, will have positive effects on health.	+	As for Option 1.	+	As for Option 1.	+	As for Option 1 but with more possibilities for positive effects through developer contributions due to the scale of the Mixed Use site; uncertainty as depends on emerging Policy SA 1 including more – directly through e.g. health centre and cycleways to	++	?
	The potential site includes local primary school; sustainability could be enhanced if such								

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	facilities could provide other uses, especially for older children/young adults in the evening, and/or local doctor/nurse attendance.						encourage health living etc.		
15 Housing	Major positive effects for contributing to the locally identified need for housing ²⁴ , including affordable housing and Extra Care Facilities. The scale of the allocation should enable a good range, type and tenure with flexibility for changing needs over time with		++	Same as Option 1.	++	Same as Option 1.	++	Same as Option 1.	++

²⁴ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [Accessed July 2013]

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	long term cumulative positive effects – details depend on planning brief and masterplanning.								
16 Green Space	The NE boundary of the proposed housing includes narrow strip of new GI for the Normans Brook and including the Gloucestershire Way, a long distance route between Tewkesbury and Chepstow. Accessibility will be enhanced through the improvement to the GI network – if implemented through emerging Policy SA 1 7	+	Same as Option 1.	+	Same as Option 1.	+	Same as Option 1 but the scale of the proposed MU development should provide opportunities to include major areas of GI linking with the GI network and to maintain some linkages and green space between the 2 urban areas. Uncertainty as depends upon	++	?

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	v, C 13 and other Core Policies.							planning briefs and masterplanning.	
17 Education	The urban extension approach with easy accessibility from the edge to the city centre will	++	As for Option 1.	++	As for Option 1.	++	As for Option 1.		++

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18 Cultural e	support existing educational services. Provision of a primary school is a requirement of the proposals so there will be no adverse effects through overloading capacity of existing schools.							
	There are no cultural heritage or tourism assets in or adjacent to the site, so effects are likely to be		○	As for Option 1.	○	As for Option 1.	○	As for Option 1.

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	neutral.							

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Summary of Key Negative and Positive Effects for Sustainable Development:

The Options are located on Land to the north/ north east of the City of Gloucester with some Options including land which forms Gloucestershire airport. All Options support the SA objectives of: Climate change adaptation and mitigation; Sustainable communities – safety; Education and skills; and health with uncertainty of effects on Historic environment. There are potential minor negative effects on the SA objectives of Resources – use (Option 1 - 3) and Waste and pollution (all options) given the location of the Options (Greenfield land in the Green Belt) and the scale of the development proposed.

Key Negative Effects:

- Option 4 is likely to have significant effects on the SA objective of Resources – use as the larger quantum of development would cover an area which significantly contributes to the Green Belt and contributes (in small part) to the visual gap between Gloucester and Cheltenham.

Key Positive Effects:

- All allocations are likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Flooding; City and town centres; Education and skills; Sustainable communities - equality and well being; and Housing.
- Options 2, 3 and 4 are more likely to have significant positive effects on the Economy as they provide for a large amount of employment land.

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	Option 1	Option 2	Option 3	Option 4
	Description: H=33.5 ha, 850 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport	Description: H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North	Description: H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South	Description: H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.
	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester	Initial SA Summary Report (2011) Ref.: part of original broad location G2 – Land North/ North East of Gloucester
- The greater quantum of development in Option 4 should provide opportunities to include major areas of GI linking with the GI network and to maintain some linkages and green space between the 2 urban areas and have greater indirect positive effects on health, compared to the other Options. Mitigation, Recommendations and Residual Effects for Plan-making - Initial findings of the HRA screening have found that the allocation is just over 6km away from the Cotswold Beechwoods SAC so unlikely to have a significant effect alone. Norman's Brook runs through the site and eventually flows into Hatherley Brook, which flows into the River Severn. The River Severn SAC/ SPA/ Ramsar and Walmore Common SPA/Ramsar are downstream so there is the potential for impacts alone on water quality. Norman's Brook should be protected and retained and any proposal for development should ensure that impacts on water quality and resources are minimised.				

SA of Potential Strategic Allocation North East Gloucester G3

Potential Strategic Allocation North East Gloucester G3						
SA No		Assessment of Effects				
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
		Option 1		Option 2		
		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		Description: H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		
		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected ²⁵ . The allocation site consists of a large area of Greenfield land which is predominantly used for agriculture. Habitats of potential value on site which could be negatively affected by the development include an area of deciduous woodland (priority habitat). Mitigation and enhancements to reduce negative effects and improve the existing habitats or create new ones are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment. The presence of protected species is unknown at		++	As for Option 1, although it contains a priority habitat – a traditional orchard which will be retained as part of the Green Infrastructure/ landscape buffer.	++

²⁵ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation North East Gloucester G3					
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	Option 1		Option 2		
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	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		
	this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment. Given that there are no international, national or local nature conservation designations on the site or adjacent to the site and that there are opportunities to enhance biodiversity and improve connectivity between green spaces and functional habitats, it is considered that the allocation could have a minor positive effect on the SA Objective of Biodiversity.				
2	CLIMATE CHANGE MITIGATION	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to	+	The effects are considered to be the same as for Option 1 although the larger scale could lead to more choice of renewable technologies through increased viability.	+
	Reduce contribution to climate change and support households and businesses in				

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		Option 1		Option 2	
		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		Description: H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension	
		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester	
	reducing their carbon footprint	lead to minor positive effects in the long-term on climate change mitigation. The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.			
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	The requirements for improving flood storage capacities will contribute to positive effects for climate change adaptation (and see SA Objective No. 4 Flooding following). Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1	+	As for Option 1 - The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS.	+

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	Option 1		Option 2	
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	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester	
	under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. As a result, the effects on climate change adaptation are expected to be minor positive. As a result, the effects on climate change adaptation are expected to be minor			

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	Option 1		Option 2		
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	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		
	positive. Flooding is considered separately under SA Objective 4.				
4	FLOODING	The allocation site is in an area where flooding from rivers is very unlikely (Flood Zone 1) ²⁶ . However, given the size and scale of the development	○	Same as Option 1. The higher quantum of development proposed will create higher demands on flooding capacities. However, any potential issues	○

²⁶ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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	Manage and reduce flood risk and surface water run-off	proposed on the allocation site, potential long-term negative effects on surface water could arise due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. As a result, it is considered that effects on flooding will be neutral.			could be mitigated through reducing surface water run-off by aiming for water neutral development.	
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	With regard to water, there is a water course which is present in the centre of the site and flows south / north and this could be a potential receptor for contaminants from surface water run-off generated by the impermeable surfaces of any development.	-		The effects are considered to be the same as for Option 1 although the larger scale could lead to slightly more enhanced negative effects.	-
	Protect and	In addition, the site lies within a drinking water				

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	improve the quality of natural resources including soil, water and landscape	protected area which is identified as being 'probably at risk' and partly lies on a minor aquifer which is considered to be of high vulnerability. ²⁷ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction. The area is not in or adjacent to any landscape designations and has been identified as being an area of medium to low landscape sensitivity ²⁸ . This lower quality landscape character is less sensitive such that the effects of the development are unlikely to be significant and the landscape could be replaced or substituted – or improved.			
6	NATURAL ENVIRONMENT AND RESOURCES:	The effects on the use of natural resources will depend upon the design and construction methods to be used at the development	-	As for Option 1 although negative effect will be more certain because of the large quantum of development.	-

²⁷ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

²⁸ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

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	Option 1		Option 2	
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USE	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester	
	management level. Certainty of positive effects and mitigation of negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment. In addition, the majority of the site contains predominantly grade 4 agricultural land which is considered to be of poor quality and its loss would be negligible. The allocation site has been identified as making a 'significant contribution' to the purposes of the Green Belt ²⁹ and is on Greenfield land. As a result, the allocation could have major long-term negative effects. Mitigation is provided by part of the allocation itself (the large area of green infrastructure allocated) and in the wording of emerging Policy SA 1 under: C Infrastructure; D Environment; and E General. The mitigation to help protect landscape should ensure that long-term			

²⁹ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

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	Option 1			Option 2		
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	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester			Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		
	negative effects on landscape are reduced to minor.					
7	HISTORIC ENVIRONMENT	There are no conservation areas or scheduled monuments on or adjacent to the allocation site ³⁰ .	+	?	As for Option 1 although the higher quantum of the development could have greater negative effects	○ ?

³⁰ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

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	Protect and enhance the area's distinctive historic environment	There are two listed buildings adjacent to the allocation to the East whose settings could be affected by the proposed development. Protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features. As a result, it is expected that the development will lead to enhancement leading to minor positive effects. However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.		than anticipated in Option 1. However, it is still expected that any negative effects can be mitigated and it is anticipated that the effects will be neutral.	

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		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester			Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester	
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The allocation site is bounded on 2 sides by the A40 It does not have good access to public transport (limited access to bus stops although station is just over 4 km away. However, mitigation has been included in emerging Policy SA 1 under C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. In addition, the policy wording includes several requirements for contribution to local infrastructure and provision of transportation measures to address the issues. This could lead to long-term major positive effects. Given the size of the allocation and although there are no known traffic and transport issues, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure and under E General with the requirement to submit a Transport Assessment.			+	?
					As for Option 1, although the larger scale of the development could increase the certainty of negative effects in terms of traffic creation. However, as the allocation offers betterment to the existing transportation network in the policy wording it is considered to still have long-term positive effects albeit minor.	+
						?

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		Option 1		Option 2	
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9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The majority allocation site is located on Greenfield agricultural land and therefore it is considered that there is limited potential for contamination to be present. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects. The Western and Northern edges of the site is adjacent to the main road in and out of Gloucester which could mean that noise may affect the dwelling houses proposed on the Western half of the site which are considered to be noise sensitive development. There is also potential for temporary negative effects during construction on existing development. It is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation. In terms of waste, given the scale of development		-	-

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	proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General.			
	Furthermore, there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust during construction. Mitigation is offered to reduce traffic as outlined under SA Objective 8.			
	The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects on noise, air quality and construction waste.			

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10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The allocation makes provision for 315 dwellings which could increase the supply of labour in the area. The allocation could also help to support the growth of business and could lead to an increase spending on goods and services in the area. In addition, it provides a new park and ride scheme and sets aside a safeguarded area to expand the park and ride when needed. The creation of the park and ride could create additional job opportunities and increase access for all into the city centre leading to major positive effects.	++	As for Option 1 although the allocation identifies 17.4 ha of land for employment uses and therefore positive effects will be greater than in option 1.	++
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning	Although the allocation site is on the city's edge, it is within 3.3 km of the centre with the provision of a park and ride scheme for public transport improvement. Therefore the allocation is expected to support the vitality and viability of Gloucester's City centre leading to major positive effects.	++	As for Option 1, although the certainty of positive effects is greater given that the level of proposed development is greater.	++

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	destinations				
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing and greater access to the city centre through improved public transport. However given its' size the effects would be minor positive effects.	++	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all. In addition, it makes provision for a new local centre.	++
13	SUSTAINABLE COMMUNITIES: SAFETY	The allocation could provide a chance to improve safety/ reduce crime through design. At present, the effects are considered to be uncertain and	?	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and	?

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	Reduce crime and the fear of crime	may depend on design and layout details at the development management level.		good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.		
14	HEALTH	The allocation provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12). The site has good access to existing health facilities at Churchdown and in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services that are essential for development to take place or which are needed to mitigate the impact of development at the site or neighbourhood level will be secured through Planning Obligations/CIL. Despite local health facilities not being specified, it is assumed that this is a consideration.		As for Option 1.		
	Improve access to health facilities and promote healthy					

Potential Strategic Allocation North East Gloucester G3					
SA No	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
	Option 1		Option 2		
	Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		Description: H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		
	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		
	Furthermore, there are requirements under C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycle ways (see SA Objective No. 7). This will have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.				
15	HOUSING	The allocation provides the opportunity to develop an additional 192 homes. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing and that sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. This will lead to major long-term positive effects for contributing to the locally	++	As for Option 1.	++
	Ensure everyone has access to a decent home that they can afford and meets their needs				

Potential Strategic Allocation North East Gloucester G3					
SA No	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
	Option 1		Option 2		
	Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		Description: H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		
	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		
	identified need for housing ³¹ .				
16	GREEN SPACE	The allocation site is located on a large area of Greenfield land which is currently used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term major negative effect on green space. However, a large area has been set aside for green infrastructure and mitigation in emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.	+	As for Option 1 although more Greenfield land has been allocated for development leading to increased minor negative effects.	-
	Create, enhance, protect, connect and improve access to open spaces				

³¹ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [Accessed July 2013]

Potential Strategic Allocation North East Gloucester G3					
SA No		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		Description: H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension	
		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester	
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The allocation provides the opportunity for additional housing which may attract a skilled workforce along with job creation which may maintain skills and enhance them. The effects are considered to be uncertain at this stage as it will depend upon whether the additional housing will bring in skilled workers. In addition, the site has good access to local schools in the area (within 20 minutes walk). Existing spare capacity to accommodate new students as a result of the development of the allocation site is uncertain at this stage.	?	As for Option 1 although land for employment has been allocated which could create opportunities to enhance skill and obtain new ones. However, the effects are still considered to be uncertain.	?
18	CULTURE AND TOURISM Protect and enhance cultural heritage and	Given the nature of the allocation, effects of this SA Objective are considered to be neutral.	○	As for Option 1.	○

Potential Strategic Allocation North East Gloucester G3				
SA No	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	Option 1		Option 2	
	Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension		Description: H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension	
	Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G3 – Land to the North-east of Gloucester	
promote tourism				
Summary of Key Negative and Positive Effects for Sustainable Development: The Options are located on a parcel of Land to the North East of Gloucester city. All Options support the SA objectives of Climate change adaptation/ mitigation and transport with uncertainty of effects on Historic environment, education and skills and Sustainable communities – safety. There is potential for minor negative effects on the SA objectives of Resources – quality and Waste and pollution. Option 1 is likely to lead to minor positive effects on green space where as Option 2 is likely to lead to negative effects given the greater quantum of development. Key Negative Effects: - No significant negative environmental effects have been identified. Key Positive Effects: - All Options are likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Economy; City and Town centres; Communities – equality; Health; and Housing. Mitigation, Recommendations and Residual Effects for Plan-making - Given the proximity of the main road to the proposed residential development for all options, it is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation, given its' proximity to major roads and the railway line. This should reduce negative effects a lead to neutral residual effects on noise. - Initial findings of the HRA screening have found that it is unlikely that there will be significant effects on European sites, given the location of the site, adjacent to existing development and the A40, and scale of development proposed. Any proposal for development should seek to minimise impacts on water quality and resources.				

SA of Potential Strategic Allocation Brockworth G4

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no internationally protected habitats³² in the area. There is one area of Priority BAP³³ Habitat for traditional orchard and this is protected as part of the proposed GI network, so no significant negative effects on protected biodiversity. There are no LNRs in the area (see SA Objective No 16 Green Space). A narrow area of GI following the boundary edge A417 is indicated on the proposals map with specific requirements for this new GI to be actively managed for biodiversity purposes; this with the three further areas of GI required will have positive effects for GI biodiversity overall. Major improvement in biodiversity is possible but the effectiveness of such enhancement	++	As for Option 1 although less development is allocated and nature of effects will be slightly reduced.	++

³² Defra (2013) Magic – Statutory Rural Designations - <http://magic.defra.gov.uk> [accessed September 2013]

³³ Gloucestershire County Council Biodiversity Action Plan - <http://www.gloucestershirebap.org.uk> (accessed September 2013)

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		will be dependent upon the implementation of emerging Policy SA 1 (Strategic allocations) and other Core Policies together with clear planning briefs and masterplanning. The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment.			
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to lead to minor positive effects in the long-term on climate change mitigation.	+	As for Option 1.	+

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.			
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	The requirements for improving flood storage capacities will contribute to positive effects for climate change adaptation (and see SA Objective No 4 Flooding following). The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS. Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable	+	As for Option 1.	+

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		construction methods. As a result, the effects on climate change adaptation are expected to be minor positive.			
4	FLOODING Manage and reduce flood risk and surface water run-off	The Horsebere Brook is subject to flooding (Zone 2 and 3) ³⁴ but this is limited by the local topography and the EA map shows only a narrow strip of flooding. The strategic site allocation proposes development outside these narrow flood zones and with a requirement for flood storage betterment across the site in line with SFRA2 ³⁵ to improve the capacity of the floodplain upstream of Longford will have wider positive effects for flood risk management. Emerging Policy SA 1 D18 requires development to provide phased SUDS and	++	As for Option 1.	++

³⁴ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

³⁵ Halcrow Group Ltd (July 2012) Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Strategic Flood Risk Assessment for Local Development Framework Level 2. Online at <http://www.gct-jcs.org/EvidenceBase/StrategicFloodRiskAssessment.aspx> [Accessed September 2013]

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		this will have positive effects in short to long term.			
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	Flood storage betterment is required and this will have positive effects generally but the policy wording does not explicitly mention water quality. The area at its narrow eastern edge is adjacent to the Cotswold AONB ³⁶ and the site itself is in an area of medium landscape sensitivity ³⁷ . The site is well connected to the south with existing development at Brockworth; the area to the north of the A417 remains undeveloped such that the view from the AONB should not be adversely affected. The site lies within a drinking water protected	-	As for Option 1.	-

³⁶ Defra 2013) Magic – Landscape <http://magic.defra.gov.uk> [accessed September 2013]

³⁷ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		area which is identified as being ‘probably at risk. ³⁸ ’ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.			
		Emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and details of planning brief and masterplanning.			
6	NATURAL ENVIRONMENT AND	There will be loss of soils but the land is not classified ³⁹ as important agricultural land	-	As for Option.	-

³⁸ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [Accessed September 2013]

³⁹ Defra 2013) Magic – Agricultural Land Classification <http://magic.defra.gov.uk> [accessed September 2013]

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
RESOURCES: USE		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
Minimise the use of natural resources including soil, water and Greenfield land through good design		(grade 1-3) and such loss is of minor significance.			
		As mentioned previously, the site lies within a drinking water protected area which is identified as being 'probably at risk.'⁴⁰ Development could have minor negative effects on water use through potential for increased demand from new residential and community facilities. The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning. The strategic site is in the Green Belt but is			

⁴⁰ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation Brockworth G4						
Sustainability Appraisal Objective		Assessment of Effects				
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
		Option 1			Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way			Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester			Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		considered to contribute less than other areas as identified in the Greed Belt Review ⁴¹ . Therefore the potential major negative effects on setting are less as the proposed GI will act as a landscape buffer; uncertainty as depends upon details of planning brief and masterplanning.				
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	Gloucester has a rich, important and distinctive historic heritage and environment. There are no conservation areas or scheduled monuments on or adjacent to the allocation site ⁴² . There are a number of listed buildings including Brockworth Court, historic manor house (private) and gardens (open to public) as part of National Gardens Scheme) including CPRE award winning tithe barn is located in the centre of the proposed allocation. These buildings provide the core of the medieval settlement of Brockworth and	+	-	As for Option 1.	+
						-

⁴¹ Green Belt Review (2011) <http://www.gct-jcs.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf> (accessed September 2013)

⁴² English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Potential Strategic Allocation Brockworth G4									
Sustainability Appraisal Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
		Option 1				Option 2			
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way				Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way			
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester				Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester			
		archaeological features of this period may be present in the adjacent area. The specific requirement for G4 includes the need to preserve and enhance the setting of this heritage asset such that any potential negative effects should be mitigated and could lead to enhancement of the historic character. In addition, protection for the historic environment is provided in the wording of emerging Policy SA 1 D 19; thus effects are likely to be neutral. However, with regard to archaeology and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets and the potential is likely to be high. In the absence of a protection policy, the effects therefore are considered to be minor negative.							
8	SUSTAINABLE TRANSPORT	The potential allocation has a footpath running E-W through much of the area and this could be enhanced as part of an overall	+	?		As for Option 1.	+	?	

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		sustainable transport plan for the site. This should be secured through emerging Policy SA 1 C7 i - v which require high quality passenger transport links, safe and convenient pedestrian and cycle routes within and adjoining the development.			
		The specific requirement for G4 includes sustainable transport to the city centre, and within and adjoining linking to the north to Innsworth and Churchdown – with potential for major positive effects. There is also requirement to provide a pedestrian crossing on Valiant Way to link the proposed employment area to the west with the existing/new residential – positive wider effects.			
		The urban extension here provides good opportunities to link from the rest of the city and to the wider countryside. The TA required by emerging Policy SA 1 E ii should make clear how cycleways can be integrated with the existing footpaths to avoid conflict and promote sustainable travel. Some uncertainty			

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		as depends upon implementation of details to be agreed at masterplanning/project level studies. The site currently has good access to bus stops but it is just over 5.5 km from Gloucester's city centre and therefore is relatively remote compared to other allocations. However, Brockworth itself does have a centre complete with convenience retail shopping and leisure facilities which are easily accessible from the allocation site. In addition, given the size of the allocation and although there are no known traffic and transport issues, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure and under E General with the requirement to submit a Transport Assessment.			
9	WASTE AND	Given the scale of development proposed	-	As for Option 1.	-

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
POLLUTION Minimise pollution and waste to landfill		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under emerging Policy SA 1 E General 22 vi. Air, light and noise pollution are likely to increase – particularly during the construction phases in the shorter term. This may affect the residential areas to the South East and East of the proposed strategic site. Mitigation is provided by the requirement in emerging Policy SA 1 E General 22 I, ii, iii for masterplanning. The Western edge of the site is adjacent to the A417 which could mean that noise may affect the dwelling houses proposed on the Western half of the site which are considered			

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way	
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
		to be noise sensitive development. It is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation.			
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The provision of 13 ha of employment land, especially in a location close to good access and transport and housing, will have major positive effects on objectives for economic sustainability.	++	Option 2 makes provision of land for housing only.	○
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as	The urban extension approach with a strategic site providing both housing and employment land at the edge of the city with good transport into the centre will support the vitality and viability of the city centre. This will lead to minor positive effects due to the	+	As for Option 1 although land for employment purposes is not provided leading to greater dependency on the city centre. This does not change the nature of the effect.	+

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
	retail, service, leisure and learning destinations	distance (approximately 5.5 km) from the city centre.			
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective numbers 8 Transport 14 Health and 15 Housing). The urban extension approach provides a scale at which high quality design and accessibility for all should be more deliverable and certain. A mixed use Local Centre Community Hub is included and this should provide for a wide range of facilities and services that could have very positive effects to reduce inequalities – depends upon planning brief and detailed masterplanning.	++	As for Option 1 although land for employment is not provided.	++

Potential Strategic Allocation Brockworth G4									
Sustainability Appraisal Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
		Option 1				Option 2			
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way				Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way			
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester				Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester			
		This allocation includes 1 no site for Gypsy/Traveller and Extra Care Facilities with major positive effects. Care will be needed during masterplanning to ensure that this is sited to minimise any adverse effects for integration with new and existing communities.							
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain - depends on design and layout details in planning briefs and masterplanning.				As for Option 1 although land for employment is not provided.			
14	HEALTH	The opportunities for improved accessibility to green space as part of wider GI network,				As for Option 1.			

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester		Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	
	Improve access to health facilities and promote healthy	including footpaths and the Gloucestershire Way, long distance path, will have positive effects on health. The potential site includes a mixed use Local Centre Community Hub – if this includes health facilities and encourages communities/individuals to live a healthier lifestyle, there is the potential for major positive effects – some uncertainty as depends upon details of masterplanning. It is also close to existing health facilities within 1 mile.			
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	Major positive effects for contributing to the locally identified need for housing ⁴³ , including affordable housing and 1 no Gypsy/Traveller and Extra Care Facilities. The scale of the allocation should enable a good range of type and tenure with flexibility for changing needs over time with long term cumulative positive effects – details depend on planning brief and masterplanning.	++	As for Option 1.	++

⁴³ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [accessed September 2013]

Potential Strategic Allocation Brockworth G4									
Sustainability Appraisal Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
		Option 1				Option 2			
		Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way				Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way			
		Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester				Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester			
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The potential allocation has a footpath running E-W through much of the area and this could be enhanced as part of an overall sustainable transport plan for the site. Accessibility will be enhanced through the improvement to the GI network – if implemented through emerging Policy SA 1 7 v and other Core Policies. The potential site includes possibilities for enhancing access from the existing housing to the south; there is a new area of GI well connected to the existing school with its playing field and sports ground – with major positive effects – also another area of GI near the Community Hub that is well placed to promote positive effects for improving access to open green spaces.		+	?	As for Option 1.		++	?
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The urban extension approach with easy accessibility from the edge to the city centre will support existing educational services. Provision of a primary school is a requirement of the proposals so there will be no adverse effects through overloading capacity of existing schools.		++		As for Option 1.		++	

Potential Strategic Allocation Brockworth G4					
Sustainability Appraisal Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
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18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	There are no cultural heritage or tourism assets in or adjacent to the site, so effects are likely to be neutral; Brockworth Court is not open to the public and its gardens are only open twice a year.	○	As for Option 1.	○

Potential Strategic Allocation Brockworth G4		
Sustainability Appraisal Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
	Option 1	Option 2
	Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester
Summary of Key Negative and Positive Effects for Sustainable Development: Both Options are located on Land to the east of the City of Gloucester to the north-east of Brockworth. All Options support the SA objectives of: Climate change adaptation and mitigation; Transport; and City and Town Centres, with uncertainty of effects on Sustainable communities - safety. There is potential for minor negative effects on the SA objectives of Resources – quality, Historic environment and use and Waste and pollution given that both the Options are located on Greenfield land in the green belt and a small part is adjacent to the Cotswold AONB), the presence of heritage assets and the scale of the development proposed. Key Negative Effects: - No significant negative environmental effects have been identified. Key Positive Effects: - The allocation is likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Flooding; Sustainable communities - equality and well being; Housing; Green Space; and Education and skills. - Option 1 is likely to lead to significant positive environmental effects on the economy. Mitigation, Recommendations and Residual Effects for Plan-making - It includes a site for Gypsies/Travellers and Extra Care Facilities with major positive effects. Care will be needed during masterplanning to ensure that this is sited to minimise any adverse effects for integration with new and existing communities and this will increase the certainty of positive effects. - Initial findings of the HRA screening have found that the impacts of any proposed development on European sites are likely to be as follows: - Increased traffic along the A46 - will proposed development lead to a significant increase in traffic and therefore atmospheric pollution on the section of the A46 adjacent to the Cotswold Beechwoods SAC. Any proposal should demonstrate that it will not result in a significant increase in atmospheric pollution at the Cotswold Beechwoods SAC.		

Potential Strategic Allocation Brockworth G4		
Sustainability Appraisal Objective	Assessment of Effects	
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	Option 1	Option 2
	Description: H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester	Description: H=61.7ha, 1550 dwellings; new roundabout from Valiant Way Initial SA Summary Report (2011) Ref.: part of original broad location G4 – Land East Gloucester
- Increased recreation at Cotswold Beechwoods SAC - development at this site alone is unlikely to result in a significant increase of recreational activity on the SAC; however, in combination with other plans and programmes there is the potential for a significant effect. Any proposal should seek to ensure that a sufficient level of open space and recreational areas are provided. - Impacts on water quality and resources - Horsbere Brook runs along the boundary of the site and eventually flows into the River Severn. Potential for impacts on the River Severn SAC/ SPA/ Ramsar and Walmore Common SPA which are downstream. Any proposal should seek to protect and maintain Horsbere Brook as well as minimise impacts of development on water quality and resources.		

SA of Potential Strategic Allocation Highnam G8

Potential Strategic Allocation Highnam G8					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, national or local nature conservation designations on the allocation site which could be directly affected ⁴⁴ . However there Key Wildlife Site (Lassington Wood) (and see SA Objective No 16 Green Space) which is adjacent the eastern boundary of the allocation which could be indirectly affected by the proposed development through an increase number of people using the nature reserve for recreation. The rest if the site consists of intensive arable fields which are large in size and have poor structure	++	Significantly less development with only 265 houses is planned i.e. not a strategic allocation. This means that any negative effects are likely to be less significant and also that less land is available for green infrastructure improvements and enhancements. The proposed site is bounded to the west by the locally important key nature conservation site of Pipers Grove; also further to the west is Corseleas Brake/Mary Grove – these two sites are important locally as the only areas of ancient semi-natural woodland. The site is adjacent to the Historic	++

⁴⁴ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation Highnam G8					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
	Option 1		Option 2		
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan		
	(relatively few hedgerows). Mitigation and enhancements to reduce negative effects and improve the existing habitats or create new ones are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; E General to submit a Green Infrastructure Framework to illustrate how the development will maximise opportunities to enhance the environment. This could lead to long-term major positive effects on biodiversity. Consideration should also be given to inserting wording to enhance the existing nature reserve, possibly to increase the size of it or to offer contributions towards its management. The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/			Park and Gardens at Highnam Court to the north, although separated by the A40; proposed GI buffer will also mitigate any potential negative effects. Constraining the development site to a much smaller size will reduce potential risk of negative effects on the local wildlife site; provision of a GI/landscape buffer around the south and east edges should mitigate any negative effects. The proposals also include additional GI around the development area to the east, so overall positive effects for biodiversity in the longer term.	

Potential Strategic Allocation Highnam G8				
Sustainability Objective	Assessment of Effects			
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	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
	disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment.			

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		Option 1		Option 2	
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		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to lead to minor positive effects in the long-term on climate change mitigation. The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.	+	The effects are considered to be the similar to those for Option 1 despite the allocation being considerably smaller in size.	+

Potential Strategic Allocation Highnam G8					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
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3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	The requirements to manage surface water on the site will contribute to positive effects for climate change adaptation (and see SA Objective No 4 Flooding following). Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. As a result, the effects on climate change adaptation are expected to be minor positive.	+	The effects are considered to be the similar to those for Option 1 despite the allocation being considerably smaller in size.	+
4	FLOODING	The allocation site is in an area where	○	Flood risk reduced significantly as	○

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		Option 1		Option 2	
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		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
Manage and reduce flood risk and surface water run-off		flooding from rivers is very unlikely (Flood Zone 1) ⁴⁵ . However, given the size and scale of the development proposed on the allocation site, potential long-term negative effects on surface water could arise due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. No specific requirements re flood management improvements for G8, so overall effects likely to be neutral.		development size is reduced. The site is constrained by the railway and flooding in Zones 2 and 3 to the south; also flood risk Zones 2 and 3 to the south east. With the significant reduction in development size, risk of flooding is also reduced and unlikely to be significant, so overall neutral effects – especially if emerging Policy SA 1 requirements for SUDS are implemented.	

⁴⁵ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The site is on a hill that then slopes steeply to the River Leadon to the east at some 500 m distance; unlikely to be at risk of pollution from surface water run-off. However, the policy wording does not explicitly mention water quality. The site lies within a drinking water protected area which is identified as being 'probably at risk' and lies on a minor aquifer which is considered to be of intermediate vulnerability. ⁴⁶ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction. The area is not in or adjacent to any	-	There is a small brook running north-south through the site draining from the Historic Park/Garden lakes. Although general emerging Policy SA 1 protects flood risk, the policy wording does not explicitly mention water quality and there could be minor negative effects. Mitigation through emerging Policy SA 1 as for Option 1. Careful landscaping buffering will be required to minimise effects on the setting of the Historic Park/Gardens to the north.	-

⁴⁶ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation Highnam G8				
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	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
	landscape designations ⁴⁷ and is far away from the Cotswold AONB; local landscape importance is medium to low ⁴⁸ . The proposed development areas are well connected to the existing development in Highnam and each of the 4 proposed areas include landscape buffering/GI to screen the buildings from the outside – details specified in the requirements for G8. Further mitigation is provided by CP17 under C13 D20 and 21.			
	In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its integration with existing developments and its relationship with			

⁴⁷ Defra 2013) Magic – Landscape <http://magic.defra.gov.uk> [accessed September 2013]

⁴⁸ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

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		surrounding countryside and to produce Green Infrastructure Framework. The mitigation, including phasing, to help protect landscape should ensure that long-term negative effects on landscape are reduced to minor – some uncertainty as depends on detailed masterplanning. Careful landscape buffering will be required for the southern area of development to minimise effects on the setting of the Historic Park/Gardens to the south.				
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources	There will be some loss of high quality agricultural land (Grade 1) in the proposed development area to the SW and loss of lesser quality Grade 3B in the area to the south – major/ minor long-term negative effects. However, some of the soil resource	-	--	No loss of good quality (grade 1-3) agricultural land; some soil improved and retained as part of new GI, thus overall approaching neutrality of effects. As for Option 1 with regard to drinking water	-

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	including soil, water and Greenfield land through good design	will be retained as part of the new GI thus mitigating to some extent. As mentioned previously, the site lies within a groundwater drinking water protected area which is identified as being 'probably at risk. ⁴⁹ ' Development could have minor negative effects on water use through potential for increased demand from new residential and community facilities. The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will		protected area; minimising water and Greenfield use; significant reduction in size of proposed development reduces use of natural resources.	

⁴⁹ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)			Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan			
	facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning. The allocation site is not within the Green Belt ⁵⁰ , and therefore less negative effects on use of Greenfield land.						
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	There are no conservation areas, listed buildings or scheduled monument on the allocation site ⁵¹ . There are national historic listings at Lassington to the north but the proposals include landscape/GI buffering which should mitigate any potential negative effects to the setting of these		+	-	As for Option 1. The site is south (rather than dispersed and to the north) of Highnam Court and Park – separated by the A40 which provides a distinctive boundary. Landscape/GI buffers are provided and should mitigate for any negative effects on the setting of the protected house and	
						0	?

⁵⁰ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

⁵¹ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

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	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
	assets. Highnam Court (nationally listed building Grade 1 ref: 134321) is located to the south within historic gardens (Grade 2) that are listed on the EH Register of Parks and Gardens of Special Historic Interest. The historic park is separated from the proposed development by the track and footpath that runs west from the B4215. A landscape/GI buffer is included to the south of the proposals and this should mitigate any adverse effects on the setting of Highnam Court and Park/Gardens. In addition, protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green infrastructure to include measures to		park/garden. As a result the effects are considered to be neutral. The presence of archaeology is uncertain.	

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	Option 1		Option 2	
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)	
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
	mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features. As a result, the effects are likely minor positive given the requirement for enhancement.			
	However, the potential for archaeology is likely to be high as a recent study ⁵² for the EH Nationally Mapping Project identified a rich heritage particularly for mediaeval and post-mediaeval remains in the Highnam area. There currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be negative. Given the			

⁵² http://www.english-heritage.org.uk/publications/nmp-leadon-valley-sand-and-gravel-aggregate-area/Leadon_Valley_Report_web.pdf

Potential Strategic Allocation Highnam G8						
Sustainability Objective	Assessment of Effects					
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making					
	Option 1			Option 2		
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.			Description: 265 dwellings (12 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)			Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan		
	high potential for archaeology, consideration should be given to inserting specific policy wording requiring that an archaeological assessment of the site is carried out prior to construction.					
8	SUSTAINABLE TRANSPORT	The allocation site areas are well connected to the village of Highnam which is located to the northern edge of the B4215 and is not served well by public transport (bus stops located adjacent to the North border of the site). As Highnam is rural and separated from the city, this scale of development could result in increased car usage for access with significant negative effects. However, mitigation has been included in emerging Policy SA 1 under C7-13 Infrastructure and specific requirements for sustainable transport are set out in G8, including phasing. This could lead to long-term positive effects by mitigating negative		+	?	
	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car			The scale of development is not large enough to support transport gain of a Park and Ride to benefit the wider communities. However, the smaller scale will have less significant effects on the existing transport system. Minor effects are part mitigated through the GI and it may be possible to link into the Gloucestershire Way, long distance footpath that runs SE-NW on the south side of the railway out with the site. There is no footpath between the site and Highnam and it is unclear how one can be achieved to cross the A40. Overall effects are minor negative but some uncertainty as depends upon details of proposals.		-
						?

Potential Strategic Allocation Highnam G8				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	Option 1		Option 2	
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)	
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
	effects and improving the existing transport situation in the wider area – a Park and Ride is proposed to the south at the A40. There are footpaths to the east, west and south, including the long-distance path, the Wyre Way, to the NE. Thus many opportunities to improve and link into a sustainable transport network. The provision of employment land will help limit commuter travelling. Care will need to be taken to avoid negative effects during construction phases but mitigation is provided under E General with the requirement to submit a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel.			

Potential Strategic Allocation Highnam G8					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
	Option 1		Option 2		
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan		
	In addition, given the size of the allocation and that congestion has been identified as an issue between Highnam and Over on the A40 ⁵³ , it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure and under E General with the requirement to submit a Transport Assessment.				
9	WASTE AND POLLUTION	Most of the allocation site is located on Greenfield agricultural land and therefore it	-	This Option is also on agricultural land and unlikely to include contamination. The	-

⁵³ Gloucestershire City Council (2011) Gloucestershire's Local Transport Plan 2011-26. Online at <http://www.gloucestershire.gov.uk/CHttpHandler.ashx?id=44146&p=0> [Accessed June 2013]

Potential Strategic Allocation Highnam G8					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
Minimise pollution and waste to landfill		is considered that there is limited potential for contamination to be present. The development is proposed in 3 phases which will help mitigate the potential for temporary negative effects during construction on existing development. In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General.		significant reduction in size indicates that less waste will be produced; also less pollution through increased traffic and during construction. The site is also isolated from Highnam, so less potential for noise disturbance. However, this site is bounded on three sides by 2 main roads (A40 and A48) and a railway which could affect the new residential development proposed in terms of noise. It is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation.	

Potential Strategic Allocation Highnam G8					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
	Option 1		Option 2		
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan		
	Furthermore, there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust during construction. Mitigation is offered to reduce traffic as outlined under SA Objective 8.				
	The effects on waste and pollution at this stage are considered to be minor negative given the need for further mitigation to be developed to reduce negative effects on noise, air quality and construction waste in the short-term.				
10	THE ECONOMY	The allocation for 4.2 ha employment land will ensure the availability of such land to	++	No employment land in this reduced non-strategic allocation. Site is isolated from	O

Potential Strategic Allocation Highnam G8					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	encourage new business and support existing activities; residential development could also increase the supply of labour in the area. The allocation will help to support the growth of business and could lead to an increase spending on goods and services in the area. It is expected that the allocation will have long-term major positive effects on the economy.		Highnam and city; unlikely to be any significant effects on increased spend on goods and services in area – overall negligible/neutral effects.	
11	CITY AND TOWN CENTRES	The site is approximately 4.5 km from Gloucester's centre. Given its distance and the sites poor access to public transport development at the site is expected not to support the vitality and viability of Tewkesbury's centre and lead to minor negative effects in the long-term.	-	As for Option 1.	-
	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations				

Potential Strategic Allocation Highnam G8					
Sustainability Objective		Assessment of Effects			
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		Option 1		Option 2	
		Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam. Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Description: 265 dwellings (12 ha) Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all. Specific requirement for new school, improved social infrastructure and Community Hub/Centre. Some uncertainty as details unknown at this stage.	++	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing. However given its' size the effects would be negligible or neutral.	○
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the	?	As for Option 1 but the reduced size and isolation of the allocation site is less likely to be able to offer significant reduction in crime (fear/actual); therefore strategically negligible or neutral.	○

Potential Strategic Allocation Highnam G8						
Sustainability Objective	Assessment of Effects					
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making					
	Option 1			Option 2		
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.			Description: 265 dwellings (12 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)			Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan		
	development management level.					
14	HEALTH	+ +	?	As for Option 1 for provision of good quality housing but the reduced size and isolation of the allocation site is less likely to be able to offer significant effects, therefore strategically negligible or neutral.	○	
	Improve access to health facilities and promote healthy The allocation provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12). The allocation has good access to healthcare facilities as there is a GP surgery within 800 m of the site. There are requirements under emerging Policy SA 1 C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This will have positive					

Potential Strategic Allocation Highnam G8					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making				
	Option 1		Option 2		
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan		
	effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.				
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The allocation provides the opportunity to develop 1208 homes. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing and that sustainable development principles and sustainable construction	++	As for Option 1 for provision of good quality housing but the reduced size and isolation of the allocation site.	++

Potential Strategic Allocation Highnam G8				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	Option 1		Option 2	
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)	
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
	methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. Major positive effects for contributing to the locally identified need for housing ⁵⁴ , including affordable housing and Extra Care Facilities. The scale of the allocation should enable a good range, type and tenure with flexibility for changing needs over time with long term cumulative positive effects – details depend on planning brief and masterplanning.			

⁵⁴ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [accessed September 2013]

Potential Strategic Allocation Highnam G8					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam. Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Description: 265 dwellings (12 ha) Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The allocation site is located on Greenfield land which is currently used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term major negative effect on green space. However, a large area has been set aside for green infrastructure and mitigation in emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space. Further enhancement could be gained by provision of allotment gardens to enable more local food production.	+	As for Option 1 but the reduced size and isolation of the allocation site is less likely to be able to offer significant effects, therefore strategically very minor positive or neutral.	○

Potential Strategic Allocation Highnam G8					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
		Option 1		Option 2	
		Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam. Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Description: 265 dwellings (12 ha) Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The allocation provides the opportunity for additional housing which may attract a skilled workforce along with job creation which may maintain skills and enhance them. The effects are considered to be uncertain at this stage as it will depend upon whether the additional housing will bring in skilled workers. Includes new primary school and community Centre/Hub and the site is close to existing education facilities within 800 m and therefore could have major positive effects in the long-term.	++	The site too small to provide employment land or additional services, therefore strategically neutral.	○
18	CULTURE AND TOURISM Protect and enhance cultural heritage and	Given the nature of the allocation, effects of this SA Objective are considered to be neutral.	○	As for Option 1.	○

Potential Strategic Allocation Highnam G8				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	Option 1		Option 2	
	Description: 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.		Description: 265 dwellings (12 ha)	
	Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam)		Initial SA Summary Report (2011) Ref.: part of original broad location G8 – Land to the West of Gloucester at Highnam); also was proposed as a non-strategic allocation for emerging Tewkesbury Borough Local Plan	
promote tourism				
Summary of Key Negative and Positive Effects for Sustainable Development: The Options are located on two parcels of Land to the west of the City of Gloucester and in the vicinity of the town of Highnam. It is important to note that these Options are relatively remote from Gloucester City and other services and as a result does not support the SA objective on Transport as much as other site allocations. Both Options support the SA objectives of Climate change adaptation and health with uncertainty of effects on Historic environment (Option 2) and Sustainable communities – safety (Option 1). There is potential for minor negative effects on the SA objectives of Resources – quality, City and Town Centre and Waste and pollution given the location of the Options. In addition Option 2, given its' small size is unlikely to any significant effects and has been found to have a neutral effect on many of the SA Objectives compared to Option 1. Key Negative Effects: - For Option 1, given the scale of the development, there is potential to have a significant effect on Resources – use as it will result in the loss of some high grade (grade 1) agricultural land. Key Positive Effects: - Both allocations are likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity through opportunities to enhance and improve existing habitats.				

Potential Strategic Allocation Highnam G8		
Sustainability Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
	Option 1	Option 2
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- Option 1, given its' large size, is more likely to lead to significant positive environmental effects on the following SA objectives: Sustainable communities - equality and well being; Housing; and Education and skills. Mitigation, Recommendations and Residual Effects for Plan-making - Consideration should also be given to inserting wording to enhance the existing nature reserve adjacent to Option 1, possibly to increase the size of it or to offer contributions towards its management. - For Option 1, given the high potential for archaeology, consideration should be given to inserting specific policy wording requiring that an archaeological assessment of the site is carried out prior to construction. - For Option 2, it is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation, given its' proximity to major roads and the railway line. - Initial findings of the HRA screening have found that both options are approx 1.5 km away from the River Severn and have potential for impacts on the water quality of the River Severn and therefore potential for negative effects on the River Severn SAC/ SPA/ Ramsar and Walmore Common SPA/Ramsar, which are downstream. Given the scale of development considered for Option 2 there is unlikely to be significant effects.		

SA of Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
1 Biodiversity	There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected ⁵⁵ . The allocation site consists of a large area of Greenfield land which is predominantly used for agriculture with some occasional sports/ recreation use. Habitats	++	As for Option 1 for G9, although more development in the form of just over 100 houses is planned. This could increase the certainty of negative effects but also it means that less land is available for green infrastructure improvements and enhancements. As a result, it is considered that the effects on	+	As for Option 1 for G9, although it includes a larger area to become a landscape buffer/ area for green infrastructure improvement which will increase the certainty of positive effects on biodiversity. In addition to the land identified in Option 1, the allocation includes another parcel of land to the south	++	As for Option 1 for G9 with G3, although it sets aside an even large area for landscape/ green infrastructure improvements which will mitigate against the increase in footprint compared to all other Options. Furthermore, the policy requires that the old orchard to the south west of the site will be retained. This will increase	++

⁵⁵ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	of potential value on site which could be negatively affected by the development include: a mature hedgerow around the boundaries of the site; Innsworth ditch and Unnamed Brook; and a small pocket of shrub/ woodland on the north of the site. Mitigation and enhancements to reduce negative effects and improve the existing habitats or create new ones are required in the wording of emerging		biodiversity will be minor positive instead of major positive. The effects are considered to be the same as for Option 1 despite the allocation being larger in size.		(known as G3). This parcel has similar biodiversity characteristics to the land in option 1 but also includes an area of woodland. The area of woodland is to be retained and further enhanced by connecting the woodland to a further area which will be set aside for landscape/ green infrastructure improvements. Therefore it is considered that there will be major long-term positive effects for biodiversity.		the certainty of positive effects and further biodiversity benefits.

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	Policy SA 1 under: C Infrastructure to provide green infrastructure; E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment. In addition, within the policy wording there is a requirement to provide new green infrastructure linkages along Innsworth Ditch and Unnamed Brook to be actively managed for						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbrook Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbrook Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	biodiversity purposes. This could lead to long-term major positive effects on biodiversity. Consideration should also be given to inserting wording to protect the mature hedgerow around the borders of the site with the exception to allow for the provision of access. The presence of protected species is unknown at this stage and there could be						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment. Given that there are no international, national or local nature conservation designations on the site or adjacent to the site and that there are						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
Climate change Mitigati	opportunities to enhance biodiversity and improve connectivity between green spaces and functional habitats, it is considered that the allocation could have a minor positive effect on the SA Objective of Biodiversity.							
	There is potential to reduce contribution to climate change on the	+	The effects are considered to be the same as for Option 1	+	As for Option 2 for G9.	+	As for Option 2 for G9.	+

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to lead to		although the larger scale could lead to more choice of renewable technologies through increased viability.				

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	minor positive effects in the long-term on climate change mitigation. The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
3 Adapt ation	The requirements for improving flood storage	+	As for Option 1 for G9 - The scale of urban	+	As for Option 2 for G9.	+	As for Option 2 for G9.	+

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	capacities will contribute to positive effects for climate change adaptation (and see SA Objective No. 4 Flooding following). Climate change adaption measures are		extension developments offers more possibilities for delivery of resilience and SUDS.				

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. As a result, the effects on climate change adaptation are expected						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	to be minor positive. As a result, the effects on climate change adaptation are expected to be minor positive.						
	Flooding is considered separately under SA Objective 4.						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
4 Flooding	The allocation site is in an area where flooding from rivers is very unlikely (Flood Zone 1) ⁵⁶ . However, given the size and scale of the development proposed on the allocation site, potential long-term negative effects on surface water could arise due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore		++		Same as Option 1. The higher quantum of development proposed will create higher demands on flooding capacities with less certain major positive effects. However, any potential issues could be mitigated through reducing surface water run-off by aiming for water neutral development.		++	
					As for Option 2 for G9.		++	

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. In addition, further mitigation is provided which requires that flood						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
5 Env Quali ty	storage betterment is to be provided across the site to improve carrying capacity of floodplain upstream and Longford in accordance with stage 2 SFRA2 (March 2013). As a result, it is considered that effects on flooding will be major positive.							
	With regard to water, there are two water courses which are present	-	As for Option 1 for G9, although more development could	-	As for Option 2 for G9. In addition, the site lies within a drinking water	-	As for Option 1 for G9 with G3.	-

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	on the Northern and Western borders of the site and these could be potential receptors for contaminants from surface water run-off generated by the impermeable surfaces of any development. With regard to soils, the development will lead to the loss of soil as a direct result of development. The area is not in or		increase the certainty of negative effects.		protected area which is identified as being 'probably at risk' and partly lies on a minor aquifer which is considered to be of high vulnerability. ⁵⁸ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.		

⁵⁸ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	adjacent to any landscape designations and has been identified as being an area of low landscape sensitivity ⁵⁷ . This lower quality landscape character is less sensitive such that the effects of the development are unlikely to be significant and the landscape could be replaced or substituted – or improved.						

⁵⁷ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis.

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9									
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	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making								
	G9				G3 with G9				
	Option 1		Option 2		Option 1		Option 2		
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility		
6 Resources: Use	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		
	The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Certainty of positive	-	As for Option 1 for G9, although more development could increase the certainty of negative effects.	-	As for Option 2 for G9, although further mitigation has been provided in the policy wording to offer landscape/ green infrastructure improvements including:	+ -	As for Option 2 for G9 with G3, although a greater area of land is set aside for landscape/ green infrastructure improvements to protect views from Tinkers Hill/ Churchdown Hill. This	+ -	

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	effects and mitigation of negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment. In addition, the majority of the site contains predominantly grade 3 agricultural land which is considered to be of good to moderate value and its loss would be of minor significance.				■ New green infrastructure linkages along Innsworth Ditch and Unnamed Brook to be actively managed for biodiversity purposes. ■ Enhancements to existing green infrastructure linkages to Tinkers Hill and Churchdown Hill. ■ Enhancements to and safeguarding of Pirton Brake Ancient Woodland. ■ Safeguarding of ponds and associated		could lead to major long-term positive effects.

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbrook Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbrook Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	The allocation site has been identified as making a 'significant contribution' to the purposes of the Green Belt ⁵⁹ ; is on Greenfield land; and is of medium to low landscape sensitivity ⁶⁰ . As a result, the allocation could have major long-term negative effects. Mitigation is provided by part of the allocation itself				biodiversity at Pirton Court The additional mitigation and enhancement provided and the larger area set aside for landscape/ green infrastructure improvements could lead to minor positive benefits on landscape. Furthermore, more of the land in G3 is classified as		

⁵⁹ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

⁶⁰ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	and 2) in the wording of emerging Policy SA 1 under: C Infrastructure; D Environment; and E General. Moreover, further wording has been included specifically relating to the allocation to ensure the following: ■ New Strategic buffer to be provided along northern side of the A40 Golden Valley. The mitigation to help protect landscape should ensure that long-term				grade 4 agricultural land meaning that it is poorer in quality.		

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
7	negative effects on landscape are reduced to minor.							
	There are no conservation areas, listed		As for Option 1 for G9.		As for Option 1 for G9, except there are two listed		As for Option 1 for G9 with G3.	

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	buildings or scheduled monuments on or adjacent to the allocation site ⁶¹ . In addition, protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide				buildings adjacent to the allocation to the East. With the mitigation offered in emerging Policy SA 1, it is expected that the setting of the buildings will be protected from any detrimental effects.		

⁶¹ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	green infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features. As a result, the effects are likely to be neutral. However, the potential for archaeology is unknown at this stage and there currently is no						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9									
SA No	Assessment of Effects								
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making								
	G9				G3 with G9				
	Option 1		Option 2		Option 1		Option 2		
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility		
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		
	policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.								
8 Transport	The allocation site is bounded on 2 sides by	+	?	As for Option 1 for G9, although the larger scale	+	?	As for Option 2 for G9. However, the allocation	+	?
							As for Option 1 for G9 with G3.	+	?

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	the A40 and is also divided by the B4063. It does not have good access to public transport (limited access to bus stops although station is just over 4.5 km away. However, mitigation has been included in emerging Policy SA 1 under C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and		of the development could increase the certainty of negative effects in terms of traffic creation. However, as the allocation offers betterment to the existing transportation network in the policy wording it is considered to still have long-term positive effects albeit minor.		includes provision of a new park and ride facility and in addition provides the following as further mitigation and enhancements to the road network: - Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley - Safeguarded site for Park and Ride extension - Improvements to Sustrans Route 41 providing a route		

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	infrastructure improvements. In addition, the policy wording includes several requirements for contribution to local infrastructure and provision of transportation measures to address the issues which include a new pedestrian and cycle linkages required to the north of the site. This could lead to long-term major positive effects. Given the size of the				through the broad location site from Pirton Lane to Elmbridge roundabout. As a result of the additional improvements and the park and ride, it is expected that there will be long-term positive effects on sustainable transport.		

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	allocation and although there are no known traffic and transport issues, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure and under E General with the requirement to submit a Transport Assessment.						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
9 Waste and Pollution	The majority allocation site is located on Greenfield agricultural land and therefore it is considered that there is limited potential for contamination to be present. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects.	-	This Option has similar effects as those identified for Option 1 for G9, however the development proposed is much larger and therefore negative effects will be more certain.	-	This Option has similar effects as those identified for Option 1 for G9, however the development proposed is much larger and therefore negative effects will be more certain. In addition, with regard to noise, the housing development on the area of land known as G3, is adjacent the main road of the A40. Again it is recommended that wording is inserted to require a noise assessment to be carried out	-	As for Option 1 for G9 with G3.	-

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	The Western edge of the site is adjacent to the main road in and out of Gloucester which could mean that noise may affect the dwelling houses proposed on the Western half of the site which are considered to be noise sensitive development. There is also potential for temporary negative effects during construction on existing development. It is				to identify possible noise impacts and suggest appropriate mitigation.		

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation. In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General.						
	Furthermore, there could						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust during construction. Mitigation is offered to reduce traffic as outlined under SA Objective 8.						
	The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further						

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbrook Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbrook Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
	mitigation to be developed to reduce negative effects on noise, air quality and construction waste.							
10 Economy	The allocation makes provision for 192 dwellings which could increase the supply of labour in the area. The allocation could also help to support the growth of business and could lead to an increase spending on goods and services in the area. Given the	○	As for Option 1 for G9, although the large size of the allocation may slightly increase the positive indirect effects identified.	○	As for Option 2 for G9, although the large size of the allocation may slightly increase the positive effects identified and the creation of the park and ride could create job opportunities leading to major long-term positive effects.	++	The allocation identifies 17.4 ha of land for employment uses and makes provision for 551 dwellings which could increase the supply of labour in the area. The allocation will help to support the growth of business, could provide additional jobs and could	++

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	uncertainty and the indirect nature of the effects, the effects are considered to be neutral.						lead to an increase spending on goods and services in the area. The allocation will help to support the growth of business and provide additional jobs in the area. It is expected that the allocation will have long-term major positive effects on the economy.

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1	Option 2		Option 1	Option 2		
	Description: H= 192 dwellings (8.7 ha)	Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need	Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility		
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		
11 Centres	Although the allocation site is on the city's edge, it is within 4.5 km of the centre with the potential for public transport improvement and provision of better cycling/ pedestrian to be implemented. Therefore the allocation is expected to support the vitality and viability of Gloucester's City centre. In addition, a new local centre is proposed to create a sustainable neighbourhood on the	++	As for Option 1 for G9, although the certainty of positive effects is greater given that the level of proposed development is greater.	++	As for Option 2 for G9 although the allocation includes provision for a park and ride which will enhance the positive effects.	++	As for Option 1 for G9 with G3.
							++

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
	site. The effects are considered to be major positive.							
12 Communities	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing. However given its' size the effects would be negligible or neutral.	○	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all.	++	As for Option 2 for G9. Consideration should be given to insert the requirement to create a new local centre in this option.	+	As for Option 1 for G9 with G3.	+

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
			In addition, it makes provision for a new local centre.					
13 Safety	The allocation could provide a chance to improve safety/ reduce crime through design. However given its' size the effects would be negligible or neutral.	○	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live	?	As for Option 2 for G9.	?	As for Option 2 for G9.	?

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
			and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.					
14 Health	The allocation provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will	○	The allocation provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will	+	As for Option 1 for G9. The allocation also includes a provision for affordable housing units plus an extra care facility if evidence demonstrates a need in Churchdown.	++	As for Option 1 for G9 with G3.	++

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	help to reduce health inequalities (and see SA Objective No. 12). However, due to the small scale of the allocation, it is less likely to be able to offer significant effects, therefore strategically negligible or neutral.		help to reduce health inequalities (and see SA Objective No. 12). The site has good access to existing health facilities at Churchdown and in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services that are essential for development to take place or which are				

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
			needed to mitigate the impact of development at the site or neighbourhood level will be secured through Planning Obligations/CIL. Despite local health facilities not being specified, it is assumed that this is a consideration. Furthermore, there are requirements under C Infrastructure for provision with improvements for				

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
			accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This will have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.				

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
15 Housing	The allocation provides the opportunity to develop an additional 192 homes. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy for affordable housing and that sustainable development principles and sustainable construction methods in line with the Homes and	++	As for Option 1 for G9, although more housing is to be developed (an additional 123) which will lead to major long-term positive effects for contributing to the locally identified need for housing ⁶² .	++	As for Option 2 for G9, although more housing is to be developed (an additional 119) which will increase the likelihood of major long-term positive effects.	++	As for Option 1 for G9 with G3, although more housing is to be developed (an additional 117) which will increase the likelihood of major long-term positive effects.	++

⁶² Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [accessed September 2013]

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
16 Green Space	Communities Agency's recommended level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. This will have minor long-term positive effects on housing.							
	The allocation site is located on a large area of Greenfield land which	+	As for Option 1 for G9, although more of the green space is to be	○	As for Option 2 for G9, although more land is set aside for landscape / green	+	As for Option 1 for G9 with G3, although more land is set aside for landscape /	++

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmburgh Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	is currently used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term major negative effect on green space. However, a large area has been set aside for green infrastructure and mitigation in emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing space, that landscaping and		developed to provide additional housing. As a result, it is considered that the effects will be neutral.		infrastructure improvements with additional mitigation providing in the wording of the allocation to enhance green space. As a result, it is considered to have minor positive effects.		green infrastructure improvements with additional mitigation providing in the wording of the allocation to enhance green space. As a result, it is considered to have major positive effects.

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9								
SA No	Assessment of Effects							
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making							
	G9				G3 with G9			
	Option 1		Option 2		Option 1		Option 2	
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbidge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	
17 Education	structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.							
	The allocation provides the opportunity for additional housing which may attract a skilled workforce along with job	++	As for Option 1 for G9.	++	Similar to Option 1 for G9 although the allocation does not make provision for a new primary but it does include wording which seeks	+	As for Option 1 for G9 with G3.	+

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9				G3 with G9		
	Option 1		Option 2		Option 1		Option 2
	Description: H= 192 dwellings (8.7 ha)		Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need		Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
	creation which may maintain skills and enhance them. The effects are considered to be uncertain at this stage as it will depend upon whether the additional housing will bring in skilled workers. In addition, the allocation site includes provision for a primary school.				contributions for educational infrastructure. Therefore, it is considered to have minor positive effects. It would be recommended that a school is included in the provision.		

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9							
SA No	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making						
	G9			G3 with G9			
	Option 1	Option 2		Option 1	Option 2		
	Description: H= 192 dwellings (8.7 ha)	Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads		Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need	Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility		
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown		Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester		
18 Culture	Given the nature of the allocation, effects of this SA Objective are considered to be neutral.	○	As for Option 1 for G9.	○	As for Option 1 for G9.	○	As for Option 1 for G9.

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9				
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	G9		G3 with G9	
	Option 1	Option 2	Option 1	Option 2
	Description: H= 192 dwellings (8.7 ha)	Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads	Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need	Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown	Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
Summary of Key Negative and Positive Effects for Sustainable Development: The Options are located on two parcels of Land to the south Churchdown to the East of Gloucester city. All Options support the SA objectives of Climate change adaptation and health with uncertainty of effects on Historic environment and Sustainable communities – safety (Option 2 for G9 and both Options for G3 with G9). There is potential for minor negative effects on the SA objectives of Resources – quality and Waste and pollution. In addition Option 1 for G9, given its' small size has been found to have a neutral effect on many of the SA Objectives compared to the other Options. Key Negative Effects: - No significant negative environmental effects have been identified. Key Positive Effects: - All allocations are likely to lead to significant positive environmental effects on the following SA objectives: Flooding and City and town centres. However, both Options for G3 with G9 offer more significant positive effects on more SA objectives than those for G9 on its own, through a larger quantum of development with both employment and housing as well as specified road improvements.				

Potential Strategic Allocation South of Churchdown G9 and Churchdown G3 with G9				
SA No	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	G9		G3 with G9	
	Option 1	Option 2	Option 1	Option 2
	Description: H= 192 dwellings (8.7 ha)	Description: H= 315 dwellings (14.3 ha) with new accesses from distributor roads	Description: H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need	Description: H= 650 dwellings (25 ha) and E=17 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility
	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown	Initial SA Summary Report (2011) Ref.: original broad location G9 – Land to the South of Churchdown	Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester	Initial SA Summary Report (2011) Ref.: original broad location G9 and part of G3 – Land to the North East of Gloucester
Mitigation, Recommendations and Residual Effects for Plan-making - For all Options, consideration should also be given to inserting wording to protect the mature hedgerow around the borders of the site with the exception to allow for the provision of access. This will help to increase certainty of positive effects on biodiversity. - Given the proximity of the main road to the proposed residential development for all options, it is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation, given its' proximity to major roads and the railway line. This should reduce negative effects a lead to neutral residual effects on noise. - For both Options for G3 with G9, it would be recommended that a school is included in the provision as this would lead to major positive residual effects on Education and skills. - Initial findings of the HRA screening have found that it is unlikely that there will be significant effects on European sites, given the location of the site, adjacent to existing development and the A40, and scale of development proposed. Any proposal for development should seek to minimise impacts on water quality and resources.				

SA of Non-JCS Sites

Land at Brookthorpe/ Whaddon				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 420 ha of housing (approximately 3000 dwellings)		
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.		
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, national or local nature conservation designations on the site which could be directly affected ⁶³ . The site however adjacent to the Robinswood Local Nature Reserve. The site is predominantly arable with small pockets of traditional orchard priority habitats mainly located to the south and east ⁶⁴ . Daniel's Brook dissects the site north/south to the west which could house some riparian habitat and species. Mitigation and enhancements to reduce any negative effects and improve the existing habitats or create new ones are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; and E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment. This expected to have major positive effects given the current biodiversity value of the site. The presence of protected species is not known at this stage. It is recommended that surveys are carried out at the development management level to establish presence/absence and then, if present, appropriate mitigation should be put in place to reduce any short/ long term negative effects on and provide enhancement for protected species. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure and D Environment.		++
2	CLIMATE CHANGE MITIGATION	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 under: D Environment. This requires on-site		+

⁶³ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

⁶⁴ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Land at Brookthorpe/ Whaddon				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1			
	Description: ≈ 420 ha of housing (approximately 3000 dwellings)			
	Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.			
	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	renewable energy schemes (at least 10% per building onsite) and sustainable design. This is likely to lead to minor positive effects on climate change.		
3	CLIMATE CHANGE ADAPTATION	Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design. As a result, the effects on climate change adaptation are expected to be minor positive.		+
	Adapt to the consequences of climate change	Flooding is considered separately under SA Objective No. 4.		
4	FLOODING	Daniel's Brook dissects the site north/south to the west and around the Brooks' borders it has been identified as an area of medium to high flood risk ⁶⁵ . This accounts for approximately 5% of the site and development on this flood risk area would lead to major negative effects. The major negative effects could be prevented if any potential development avoided the areas of flood risk. It would be recommended that the area identified as being at risk of flooding should be excluded from any development.		--
	Manage and reduce flood risk and surface water run-off	In addition there is potential for long-term negative effects on surface water due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water		O

⁶⁵ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Land at Brookthorpe/ Whaddon				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1			
	Description: ≈ 420 ha of housing (approximately 3000 dwellings)			
	Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.			
	on the site. As a result, it is considered that effects on surface water flooding will be neutral.			
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The area is largely located within the special landscape areas set out in the Stroud Local Plan and there is industrial development to the south-east. The site is considered to be in an area of high to medium landscape sensitivity ⁶⁶ . This is because it is highly visible from the elevated AONB and Robinswood Hill landscapes. It also has a number of public rights of way transecting it and providing linkages from Gloucester City to the AONB. Therefore the effects of large scale development are likely to be major negative and the landscape could not be replaced or substituted – or improved. Smaller scale development may be more appropriate and major negative effects may be reduced or avoided given the mitigation provided to a certain extent in the wording of emerging Policy SA 1. Emerging Policy SA 1 under C Infrastructure sets out requirement to provide Green Infrastructure which will again help screen the development from the surrounding area and also help it to blend into the surrounding landscape. Also under D Environment there are requirements to use existing field boundaries where practical to try and maintain existing landscape features. In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its integration with existing developments and its relationship with surrounding countryside and to produce Green Infrastructure Framework. Smaller scale development is still considered likely to give rise to minor negative long-term effects on landscape and would be recommended.		
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⁶⁶ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Land at Brookthorpe/ Whaddon			
Sustainability Objective	Assessment of Effects		
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
	Option 1		
	Description: ≈ 420 ha of housing (approximately 3000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.		
	As mentioned in SA objective No. 4, Daniel's Brook dissects the site north/south to the west and could be a potential receptor for contaminants from surface water run-off generated by the impermeable surfaces of any development. In the absence of mitigation to protect water quality, there could be short and long-term negative effects. In addition, there are two minor aquifers which are considered to be of high vulnerability to the south-east of Court Farm and to the North West of Naas Farm⁶⁷. In the absence of mitigation to protect water quality, there could be short and long-term negative effects on these parts of the site.		
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Certainty of positive effects and mitigation of negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment. In addition, the site is located on Greenfield land which is currently used for agricultural purposes and as a result it does not support this SA objective. However, emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and details of planning brief and masterplanning. This should reduce negative effects to neutral. With regard to soils, the development will lead to the loss of soil as a direct result of development. In addition, the south west corner of the site and a small patch to the north contain grade 3b agricultural land which is considered to be of good to moderate quality and therefore development of the south would lead to minor negative long-term effects.	O -

⁶⁷ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Land at Brookthorpe/ Whaddon				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1			
	Description: ≈ 420 ha of housing (approximately 3000 dwellings)			
	Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.			
	The whole site is located within a Groundwater Drinking Water Protected Area which is considered to be 'probably at risk'. ⁶⁸ As a result any increase in development in this area is likely to increase pressure on the drinking water supply leading to minor negative long-term effects.			
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	There are no conservation areas on or adjacent to the site ⁶⁹ . There is one Scheduled Monument (Moated site at Sneedham's Green) within 100 m of the site's eastern boundary and 4 grade II listed buildings located in the centre following the A4173. There is potential for these assets either to be directly or indirectly affected by new development on this site. Protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features. Therefore the effects are expected to be neutral. However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.		
			○	?

⁶⁸ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

⁶⁹ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Land at Brookthorpe/ Whaddon				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 420 ha of housing (approximately 3000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.		
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The site has the A4173 running through its centre and is bounded by hard barriers in terms of the M5 to the south and a railway line to the west. Access onto the M5 is not available on the site and the closest is from junction 12 which is approximately 7 km away. There are a number of bus stops which serve the A4173 to provide access into Gloucester City centre with is approximately 4.4 km away and is considered to be fairly remote compared to other sites put forward. There are limited opportunities for pedestrians to access services, as the nearest facilities are approximately 1 km away. However, mitigation has been included in emerging Policy SA 1 under C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to major long-term positive effects. Also within the policy wording, provision of transport measures including sustainable transport, improved network, pedestrian access and cycle routes are explicit which should lead to long-term positive effects. Given the size of the site, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. Existing traffic and transport conditions are not known at this stage. However mitigation is offered in the policy under: C Infrastructure with the requirement to minimise the impact of the development on the existing transport network; and under E General with the requirement to submit a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel. It is considered that the effects will be neutral.		
			+	?
9	WASTE AND POLLUTION	The majority of the site is located on Greenfield agricultural land and therefore it is considered that there is limited potential for contamination to be present. There is a requirement under D		
			-	

Land at Brookthorpe/ Whaddon			
Sustainability Objective	Assessment of Effects		
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
	Option 1		
	Description: ≈ 420 ha of housing (approximately 3000 dwellings)		
	Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.		
	Minimise pollution and waste to landfill	Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects. The site is bounded on two sides by the M5 and a main railway line which could affect the new residential development proposed in terms of noise. It is recommended that for this particular site, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation. In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by the additional housing generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General. Furthermore, there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust during construction. Mitigation is offered to reduce traffic as outlined under SA Objective 8. The effects on waste and pollution are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects of noise, air quality and construction waste in the short-term.	
10	THE ECONOMY	It is not known at this stage whether development of this site would include employment. Therefore the effects are uncertain.	?

Land at Brookthorpe/ Whaddon				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 420 ha of housing (approximately 3000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.		
	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses			
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The site is located approximately 4.4 km from Gloucester's city centre and as a result is considered to be more remote than other sites put forward. There are a number of bus stops which would provide access to Gloucester's City centre. Given the distance, development at the site is expected to support the vitality and viability of Gloucester's centre and lead to minor positive effects in the long-term.		+
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The site could reduce inequalities in wellbeing and opportunity if it provides good quality housing and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective Numbers 8 Transport 14 Health and 15 Housing). It is anticipated that development of the site will lead to minor positive effects on this SA Objective.		+
13	SUSTAINABLE COMMUNITIES: SAFETY	The site could provide an opportunity to reduce crime as good quality housing and employment facilities can create attractive places to live and work which people would like to care for and where people can feel safe. At present, the effects are considered to be uncertain and may		?

Land at Brookthorpe/ Whaddon				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1			
	Description: ≈ 420 ha of housing (approximately 3000 dwellings)			
	Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.			
	Reduce crime and the fear of crime	depend on design and layout details at the development management level.		
14	HEALTH	The site provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12).		+
	Improve access to health facilities and promote healthy	The closest GP and dental facilities are located within Gloucester 3.5 km away. Mitigation to improve access is provided, in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services that are essential for development to take place or which are needed to mitigate the impact of development at the site or neighbourhood level will be secured through Planning Obligations/CIL. Despite local health facilities not being specified, it is assumed that this is a consideration. The policy could be strengthened if health was specifically mentioned in the text. It is recommended that provision is made to incorporate health facilities into the development or seek contribution to improve access to it off-site. Furthermore, there are requirements under C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This could have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long-term management.		
15	HOUSING	The site could provide for a large number of new homes. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on		++

Land at Brookthorpe/ Whaddon				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 420 ha of housing (approximately 3000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.		
	Ensure everyone has access to a decent home that they can afford and meets their needs	Affordable housing and that sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. This will have major long-term positive effects on housing for contributing to the locally identified need for housing ⁷⁰ .		
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The site is Greenfield land which is currently used for agricultural purposes. The site is also transected by a number of public rights of way (PROWs) which give access from Gloucester to the Cotswolds AONB and Robinswood Hill Local Nature Reserve. Its development will ultimately remove this green space which the PROWs provide access to constituting a long-term minor negative effect on green space. However, mitigation in emerging Policy SA 1 under C Infrastructure requires that further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.		+
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	Access to educational facilities is considered to be poor with the majority of the site being located more than 2km from the nearest school. The private school located adjacent to the northern boundary is not accessible to all potential residents. However, , as mentioned previously, the site is has a number of bus stops along the A4173 which provides good access to Gloucester City and the educational facilities it has to offer. It is uncertain at this stage whether additional educational facilities would be provided on site. The requirements of emerging Policy SA 1 under C infrastructure should ensure that access issues are dealt with.		?

⁷⁰ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [Accessed July 2013]

Land at Brookthorpe/ Whaddon			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Option 1	
		Description: ≈ 420 ha of housing (approximately 3000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.	
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Given the nature of the site, effects of this SA Objective are considered to be neutral.	O

Land at Brookthorpe/ Whaddon	
Sustainability Objective	Assessment of Effects
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty
	Option 1
	Description: ≈ 420 ha of housing (approximately 3000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G6 – Land to the South of Gloucester at Brookthorpe with Whaddon.
Summary of Key Negative and Positive Effects for Sustainable Development: The site is located on a parcel of land to the south of Gloucester and is bounded by the M5 to the south and the main Gloucester railway line to the west. Development of the site would support the SA objectives of: Climate Change Adaptation and Mitigation; Transport; City and Town Centres; Sustainable Communities – equalities; Health; and Green Space. Uncertain effects have been identified on Historic Environment; Economy; Education and Skills; and Sustainable Communities – safety. There is potential for minor negative effects on the SA objective of: Waste and Pollution; soils (loss of moderate to good quality agricultural land); and on water quality/ use. Key Negative Effects: - Development of the site is likely to lead to major negative on flooding given that 5% is located in an area of medium to high risk flooding. - Development of the site to its maximum potential is likely to lead to major negative effects on landscape given its high to medium sensitivity owing to the fact that it is highly visible from the elevated AONB and Robinswood Hill landscapes Key Positive Effects: - The site is likely to lead to significant positive environmental effects on the SA objectives of Biodiversity and Housing. Mitigation, Recommendations and Residual Effects for Plan-making - It would be recommended that the area identified as being at risk of flooding should be excluded from any development. This would prevent any major negative effects identified. - Given the landscape sensitivity of the site, smaller scale development on the site along with the landscape related mitigation offered in emerging Policy SA 1 would be recommended. This is likely to reduce the major negative effects to minor negative. - It is recommended that for this particular site, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation. This would reduce any potential minor negative effects resulting from noise under the SA Objective of Waste and Pollution.	

Land at Hardwicke				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 112 ha of housing (approximately 1000 dwellings)		
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.		
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, national or local nature conservation designations on or adjacent to the site which could be directly affected ⁷¹ . The site is predominantly Greenfield (60%) with large employment site at its southern corner. There are a few traditional orchard priority habitats mainly located towards the south of the site ⁷² . There is a small watercourse which cuts approximately east to west on the site which could house some riparian habitat and species. Mitigation and enhancements to reduce any negative effects and improve the existing habitats or create new ones are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; and E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment. This expected to have major positive effects given the current biodiversity value of the site. The presence of protected species is not known at this stage. It is recommended that surveys are carried out at the development management level to establish presence/absence and then, if present, appropriate mitigation should be put in place to reduce any short/ long term negative effects on and provide enhancement for protected species. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure and D Environment.		+
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 under: D Environment. This requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design. This is likely to lead to minor positive effects on climate change.		+

⁷¹ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

⁷² Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Land at Hardwicke				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 112 ha of housing (approximately 1000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.		
	their carbon footprint			
3	CLIMATE CHANGE ADAPTATION	Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design. As a result, the effects on climate change adaptation are expected to be minor positive. Flooding is considered separately under SA Objective No. 4.		
	Adapt to the consequences of climate change			
4	FLOODING	There is a small watercourse which cuts approximately east to west on the site and it has been identified as an area of medium to high flood risk ⁷³ . This accounts for approximately 12% of the site and development on this flood risk area would lead to major negative effects. The major negative effects could be prevented if any potential development avoided the areas of flood risk. It would be recommended that the area identified as being at risk of flooding should be excluded from any development. In addition there is potential for long-term negative effects on surface water due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. As a result, it is considered that effects on surface water flooding will be neutral.		
	Manage and reduce flood risk and surface water run-off			

⁷³ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Land at Hardwicke				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 112 ha of housing (approximately 1000 dwellings)		
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.		
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The area is not in or adjacent to any landscape designations and there is industrial development to the south-east. The site is considered to be in an area of medium to low sensitivity ⁷⁴ . This is largely due the degradation of views and tranquility owing to proximity of large industrial units, new housing, and the busy A38. Therefore the effects of large scale development are likely to be minor negative and the landscape could be replaced or substituted – or even improved (removal of large industrial units). Mitigation is provided to a certain extent in the wording of emerging Policy SA 1. Emerging Policy SA 1 under C Infrastructure sets out requirement to provide Green Infrastructure which will again help screen the development from the surrounding area and also help it to blend into the surrounding landscape. Also under D Environment there are requirements to use existing field boundaries where practical to try and maintain existing landscape features. In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its integration with existing developments and its relationship with surrounding countryside and to produce Green Infrastructure Framework. It is likely that with mitigation the residual effects will be minor positive in the long-term. As mentioned in SA objective No. 4, a small watercourse cuts through the site and could be a potential receptor for contaminants from surface water run-off generated by the impermeable surfaces of any development. In the absence of mitigation to protect water quality, there could be short and long-term negative effects.		
		+	-	
6	NATURAL ENVIRONMENT AND RESOURCES: USE The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Certainty of positive effects and mitigation of			
		+	-	

⁷⁴ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Land at Hardwicke				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 112 ha of housing (approximately 1000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.		
	Minimise the use of natural resources including soil, water and Greenfield land through good design	negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment. In addition, the site is mostly located on Greenfield land (60%) and development of this land would not support this SA objective. However, emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and details of planning brief and masterplanning. This should reduce negative effects to neutral. Furthermore, 40% of the site is located on Brownfield land and its redevelopment is likely to lead to minor positive long-term effects. The whole site is located within a Groundwater Drinking Water Protected Area which is considered to be 'probably at risk.⁷⁵' As a result any increase in development in this area is likely to increase pressure on the drinking water supply leading to minor negative long-term effects.		
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	There are no conservation areas or Scheduled Monuments on or adjacent to the site⁷⁶. There is however a large number of listed buildings (11 in total) of differing grades (I, II and II*) concentrated in the centre of the site. Therefore, there is potential for these assets either to be directly or indirectly affected by new development on this site. Protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features.		

⁷⁵ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

⁷⁶ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Land at Hardwicke				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1			
	Description: ≈ 112 ha of housing (approximately 1000 dwellings)			
	Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.			
		Therefore the effects are expected to be neutral.		
		However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.		
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The site has the A38 running along its eastern boundary and has easy access to the M5 to the south (within 1 km of junction 12). There are a number of bus stops which serve the A38 to provide access into Gloucester City centre which is approximately 6.5 km away. It is also considered to be remote compared to other sites put forward. However, mitigation has been included in emerging Policy SA 1 under C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to major long-term positive effects. Also within the policy wording, provision of transport measures including sustainable transport, improved network, pedestrian access and cycle routes are explicit which should lead to long-term minor positive effects. Given the size of the site, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. Existing traffic and transport conditions are not known at this stage. However mitigation is offered in the policy under: C Infrastructure with the requirement to minimise the impact of the development on the existing transport network; and under E General with the requirement to submit a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel. It is considered that the effects will be neutral.		+ ?

Land at Hardwicke			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Option 1	
		Description: ≈ 112 ha of housing (approximately 1000 dwellings)	
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.	
9	WASTE AND POLLUTION	The majority of the site is located on Greenfield agricultural land and therefore it is considered that there is limited potential for contamination to be present. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects. In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by the additional housing generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General. Furthermore, there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust during construction. Mitigation is offered to reduce traffic as outlined under SA Objective 8. The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects of noise, air quality and construction waste in the short-term.	-
	Minimise pollution and waste to landfill		
10	THE ECONOMY	It is not known whether the existing Brownfield land is still in use and at this stage whether development of this site would include employment. Therefore the effects are uncertain.	?
	Ensure the availability of employment land and premises to encourage inward investment and support growth of		

Land at Hardwicke				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: ≈ 112 ha of housing (approximately 1000 dwellings)		
	existing businesses	Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.		
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The site is located approximately 6.5 km from Gloucester's city centre and as a result is considered to be remote from the city centre. There are a number of bus stops which would provide easy access to Gloucester's City centre. Given the distance, development at the site is expected to not support the vitality and viability of Gloucester's centre and lead to minor negative effects in the long-term.		
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The site could reduce inequalities in wellbeing and opportunity if it provides good quality housing and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective Numbers 8 Transport 14 Health and 15 Housing). It is anticipated that development of the site will lead to minor positive effects on this SA Objective.		
13	SUSTAINABLE COMMUNITIES: SAFETY	The site could provide an opportunity to reduce crime as good quality housing and employment facilities can create attractive places to live and work which people would like to care for and where people can feel safe. At present, the effects are considered to be uncertain and may		

Land at Hardwicke			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Option 1	
		Description: ≈ 112 ha of housing (approximately 1000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.	
	Reduce crime and the fear of crime	depend on design and layout details at the development management level.	
14	HEALTH Improve access to health facilities and promote healthy	The site provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12). The closest GP and dental facilities are located within 1.5 km of the site⁷⁷. Mitigation to improve access is provided, in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services that are essential for development to take place or which are needed to mitigate the impact of development at the site or neighbourhood level will be secured through Planning Obligations/CIL. Despite local health facilities not being specified, it is assumed that this is a consideration. The policy could be strengthened if health was specifically mentioned in the text. It is recommended that provision is made to incorporate health facilities into the development or seek contribution to improve access to it off-site. Furthermore, there are requirements under C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This could have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long-term management.	+

Land at Hardwicke			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Option 1	
		Description: ≈ 112 ha of housing (approximately 1000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.	
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The site could provide for a large number of new homes. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing and that sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. This will have major long-term positive effects on housing for contributing to the locally identified need for housing ⁷⁸ .	++
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The site is a mixture of Greenfield and Brownfield land with an approximate 60% to 40% split. The site is also transected by a number of public rights of way (PROWs). Its development will ultimately remove this green space which the PROWs provide access to, constituting a long-term minor negative effect on green space. However, mitigation in emerging Policy SA 1 under C Infrastructure requires that further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.	+
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	Access to educational facilities is considered to be good from the site with a school located adjacent to the northern boundary. In addition, as mentioned previously, the site is has a number of bus stops along the A38 and also within the existing built up area to the north which provides good access to Gloucester City and the educational facilities it has to offer. It is uncertain at this stage whether additional educational facilities would be provided on site, however, given the good access to existing educational facilities development here is likely to lead to minor positive effects. The requirements of emerging Policy SA 1 under C infrastructure should ensure that access issues are dealt with.	+

⁷⁸ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [Accessed July 2013]

Land at Hardwicke			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Option 1	
		Description: ≈ 112 ha of housing (approximately 1000 dwellings) Initial SA Summary Report (2011) Ref.: part of original broad location sub area G7 – Land to the South of Gloucester at Hardwicke.	
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Given the nature of the site, effects of this SA Objective are considered to be neutral.	○
Summary of Key Negative and Positive Effects for Sustainable Development: The site is located on a parcel of land to the south-west of Gloucester and is bounded by the Gloucester and Sharpness Canal to the north-west and the A38 to the south-east. Development of the site would support the SA objectives of: Climate Change Adaptation and Mitigation; landscape; Transport; Sustainable Communities – equalities; Health; Green Space; Education and Skills. Uncertain effects have been identified on Historic Environment; Economy; and Sustainable Communities – safety. There is potential for minor negative effects on the SA objective of: Waste and Pollution; development on Greenfield land; and on water quality/ use. Key Negative Effects: - Development of the site is likely to lead to major negative on flooding given that 12% is located in an area of medium to high risk flooding. Key Positive Effects: - The site is likely to lead to significant positive environmental effects on the SA objectives of Biodiversity and Housing. Mitigation, Recommendations and Residual Effects for Plan-making - It would be recommended that the area identified as being at risk of flooding should be excluded from any development. This would prevent any major negative effects identified.			

Appendix VIII: (b) SA of Potential Strategic Allocations for Cheltenham

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
--	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
- +	The SA Objectives 5, 6, 9, 13 and 14 consider more than one topic and as a result the plan could have different effects upon each topic considered. For example, Objective 6 includes a number of topics including soils, previously developed land, water use and Green Belt. A site/ policy within the plan could have a negative effect on the topic Green Belt but also have a positive effect on previously developed land and therefore this could lead to two symbols being shown.	

SA Summary

	Sustainability Objectives																				
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18			
Cheltenham																					
North Cheltenham C2 Option 1 Description: H=469 dwellings (18.6 ha)	+	+	+	○	-	-	○	?	+	-	-	○	++	+	?	+	++	-	?	○	
North Cheltenham C2 Option 2 Description: H=759 dwellings (30.1 ha)	+	+	+	○	-	-	○	?	+	-	-	○	++	+	?	+	++	-	?	○	
North West Cheltenham C3 Option 1 Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use	+	+	?	+	○	-	-	+	-	+	?	-	++	++	++	?	+	++	+	?	○
North West Cheltenham C3 Option 2 Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land;	+	+	?	+	-	-	-	+	-	+	?	-	++	++	++	?	+	++	+	++	○

Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy
Sustainability (Integrated) Appraisal Report: Appendix VIII (b) Potential Strategic Allocations for Cheltenham

	Sustainability Objectives																																						
	Biodiversity		Climate – Mitigation		Climate – Adaptation		Flooding		Resources, landscape		Resources, soil, water		Historic		Transport		Waste, Pollution		Economy		City, town centres		Communities – equalities		Communities – safety		Health		Housing		Green Space		Education & Skills		Culture & Tourism				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18																					
and a safeguarded area.																																							
West Cheltenham C5 Option 1 Description: E = 36.5 ha of employment land	++	+	+	○	+	-	-	○	?	+	?	--	++	++	?	?	+	○	+	?	○																		
South Cheltenham C6B Option 1 H = 800 dwellings (37.3 ha)	++	+	+	○	-	-	+	?	+	?	-	○	++	+	?	+	++	+	?	○																			
South Cheltenham C6B Option 2 H = 422 dwellings (16.75 ha) and employment land (17 ha)	++	+	+	○	-	-	+	?	+	?	-	++	++	+	?	+	++	+	?	+	○																		
South Cheltenham C6 Option 1 Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land	+	+	+	○	-	-	+	-	+	?	-	++	++	++	?	++	++	+	++	○																			
South Cheltenham C6 Option 2 Description: H = 1101 dwellings (43.7 ha) and E = 6.8 ha of employment	+	+	+	-	--	-	+	-	+	-	-	++	++	++	?	++	++	-	++	○																			

	Sustainability Objectives																			
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18		
land																				
South Cheltenham C6 Option 3 Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land	+	+	+	-	--	-	-	+	-	-	++	++	++	?	++	++	-	++	O	
South Cheltenham C6 Option 4 Description: H=1075 dwellings (43.7 ha)	+	+	+	-	--	-	+	-	+	-	-	O	++	++	?	++	++	-	++	O
Each of the options for the potential strategic allocations and urban extensions was assessed taking into account mitigation provided through an emerging draft of Policy SA1 Requirements for Strategic Allocations. The SA of the options and the early draft of Policy SA1 indicated general recommendations from the SA and are applicable to all the strategic allocations as follows:																				
The general recommendations if implemented could improve the certainty of positive effects or provide mitigation for negative effects, and include:																				
■ Consideration should be given to inserting a requirement to implement a (Sustainability) Environmental Management Plan (S/EMP) to reduce, in particular, short-term effects during construction with regard to but not limited to: noise, air quality, light, transport, waste, and use of natural resources; and to include provision for monitoring. ■ It is recommended that wording be inserted into the policy to require that at least Phase 1 Habitat Survey is undertaken on each site prior to development to identify the potential for protected species. ■ A landscape buffer around species rich hedgerows should be inserted which could be drawn onto the proposals maps for all strategic allocations. This will create a fragmented edge to ensure that hedgerows do not form part of a garden of a dwelling house; therefore this eliminates the risk of their removal. ■ Consideration should be given to inserting wording to require development (other than housing) to meet the BREEAM standard 'very good'																				

	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
or above.																		
■ Consideration should be given to increasing the minimum percentage (above 10%) of established or emerging low carbon or renewable technologies of onsite energy requirements per building. It is assumed that the 10% figure came from a requirement to implement the Merton Rule under PPS 1 and there may be scope to increase the figure now. Under the Planning and Energy Act 2008, LPAs may impose reasonable requirements for (a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; and (b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development. ■ In addition, it is recommended that wording is inserted to require development to comply with energy efficiency standards that exceed the energy requirements of building regulations. A standard that is reasonably should be established. ■ It is suggested that the historic environment & assets in the JCS area are so important that there should be a separate requirement; it should also include mitigation of significant adverse effects on the settings of heritage features and direct effects on archaeology. ■ Consideration should be given to inserting a requirement for measures to ensure equality of access to facilities and services including transport, to improve certainty of positive effects. ■ Consideration should be given to inserting a requirement for design to take account of the Safer Places: The Planning System and Crime Prevention Guidance (September 2004), to prevent crime. ■ It is suggested that details for encouraging people to use open space should be included in detailed masterplanning through signage & information etc. ■ It is assumed that the GI Framework for the JCS area will include principles for GI and strategic areas for creating and linking GI. It will be important to include provision for longer term management of such GI, perhaps through various funding mechanisms and/or community/residents groups. If not already included in the GI Framework it is recommended that this is specified. ■ If not already considered, it is recommended that the GI Framework should include the potential for provision of allotment gardens for local food production.																		

SA of Potential Strategic Allocation North Cheltenham C2

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The site is predominantly arable with some pasture fields separated by hedges with generally poor structure and development could potentially improve the structure of the hedge habitats leading to long term benefits for biodiversity. There is also a traditional orchard (Priority Habitat ¹) adjacent Swindon Lane. Moreover, there are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected ² . Higher value ecological habitats are found around gardens and smallholdings around small settlements and along brook lines, where there is some good tree structure and some riparian habitat which could be negatively affected by development of the site. Mitigation and enhancements to reduce negative effects and improve the existing habitats or create new ones, are required in the	+	The Option includes the land outlined in Option 1 in addition to a parcel of Greenfield land to the east between Swindon Lane and Hunting Butts Farm. There are no international, national or local nature conservation designations on or adjacent to this additional parcel. It is anticipated that this Option could still have a minor positive effect.	+

¹ Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk> (accessed September 2013)

² Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1		Option 2		
	Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)		
	Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse		
	wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment; and D Environment to use existing field boundaries. It is considered that the allocation could have a minor positive effect on the SA Objective of Biodiversity. It would be recommended the traditional orchard is retained as part of any development scheme.				
	The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment.				
2	CLIMATE CHANGE MITIGATION	There is potential to reduce contribution to climate change on the site through compliance	+	The effects are considered to be the same as for Option 1 despite the allocation being	+

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
Reduce contribution to climate change and support households and businesses in reducing their carbon footprint		with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes. This is likely to lead to minor positive effects on climate change mitigation. The effects also depend upon implementation and details of other policies.		larger in size.	
3	CLIMATE CHANGE ADAPTATION	Climate change adaption measures are implicit in the wording at beginning of emerging Policy		+	As for Option 1 although the larger scale offers more possibilities for delivery of
					+

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
	Adapt to the consequences of climate change	SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes. As a result, the effects on climate change adaptation are expected to be minor positive. Flooding is considered separately under SA Objective 4.		resilience and SUDS.	
4	FLOODING	The allocation site is in an area where flooding from rivers is very unlikely (Flood Zone 1) ³ .	○	As for Option 1 although approximately 11.5 ha more development is proposed to be	○

³ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
	Manage and reduce flood risk and surface water run-off	However, given the size and scale of the development proposed on the allocation site, potential long-term negative effects on surface water could arise due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. As a result, it is considered that effects on flooding will be neutral.		allocated in this Option than in Option 1. This could mean that potential long-term negative effects on surface water in terms of flooding could be greater than in Option 1. Although again, mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically address the management of surface water on the site. As a result, it is still considered that effects on flooding will be neutral.	
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	The area is not in or adjacent to any landscape designations and is described as suburban ⁴ and being in an area of medium - low sensitivity landscape ⁵ . Therefore the effects of the development are unlikely to be significant and	-	As for Option 1.	-
	Protect and improve the				

⁴ Defra 2013) Magic – Landscape <http://magic.defra.gov.uk> [accessed September 2013]

⁵ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Potential Strategic Allocation North Cheltenham C2				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1		Option 2	
	Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
	Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
quality of natural resources including soil, water and landscape	the landscape could be replaced or substituted – or improved. The allocation site is set in a prominent location on the edge of Cheltenham which can be seen from the Cotswolds AONB ⁶ and there could be cumulative effects with C3 on landscape. As a result, the allocation could have a major negative effect on landscape. Mitigation is provided 1) by part of the allocation itself and 2) in the wording of emerging Policy SA 1. 1) The allocation sets aside a large area of land to act as a landscape buffer/ opportunity to create green infrastructure to screen the views from the AONB. 2) Emerging Policy SA 1 under C Infrastructure sets out requirement to provide Green Infrastructure which will again help screen the development from the surrounding area and also help it to blend into the surrounding landscape. Also under D Environment there are requirements to use existing field boundaries			

⁶ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 83.

Potential Strategic Allocation North Cheltenham C2				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1		Option 2	
	Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
	Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
	where practical to try and maintain existing landscape features. In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its integration with existing developments and its relationship with surrounding countryside and to produce Green Infrastructure Framework. Moreover, further wording has been included specifically relating to the allocation to ensure the following:			
	■ Pay particular regard to the northern edge of site, making a clear boundary between the site and the open countryside beyond, through appropriate landscaping. ■ Racecourse related development in the area shown on the map will be restricted to those purposes which are consistent with other JCS Policies and have due regard to the gently sloping landscape features of the site and its surroundings. ■ Development should reduce in scale and density as it approaches the base of the ridge to the north of the site.			

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
		The mitigation to help protect landscape should ensure that long-term negative effects on landscape are minor. With regard to water quality, there are no watercourses present on the allocation site. However, protection is not provided for water quality by emerging Policy SA 1. With regard to soils, the development will lead to the loss of soil as a direct result of development. In addition, in a nitrate vulnerable zone but this is not expected to be affected as a result of the development.			
6	NATURAL ENVIRONMENT AND RESOURCES: USE	The site is located on green belt land which is currently used for agricultural purposes. The site is considered to make a 'significant contribution' to the Green belt purposes ⁷ and if C3 is taken	-	As for Option 1.	-
	Minimise the use of				

⁷ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

Potential Strategic Allocation North Cheltenham C2				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1	Option 2	
		Description: H = 469 dwellings (18.6 ha)	Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse
natural resources including soil, water and Greenfield land through good design		forward there are likely to be cumulative effects with regard to the loss of green belt and Greenfield land lost to the North of Cheltenham. This could result in major negative long-term effects. However, emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and details of planning brief and masterplanning. This should reduce negative impacts down to minor. The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Certainty of positive effects and mitigation of negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment. In addition, the majority of the site contains grade 3 agricultural land which is considered to be of good to moderate value and such loss is of minor significance.		

Potential Strategic Allocation North Cheltenham C2						
Sustainability Objective		Assessment of Effects				
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
		Option 1			Option 2	
		Description: H = 469 dwellings (18.6 ha)			Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435			Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	There are no conservation areas, listed buildings or scheduled monuments on or adjacent to the allocation site ⁸ . In addition, protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment and as a result, the effects are likely to be neutral. However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.			As for Option 1. There are no known heritage assets (including listed buildings, scheduled monument or conservation areas) within or adjacent to the additional parcel of land in this Option.	
8	SUSTAINABLE TRANSPORT	The allocation site is bounded on 2 sides by			As for Option 1 although the proposed	

⁸ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car		Swindon Lane and Hyde Lane and it has good access to the M5 and the main railway station, with the former being just under 4.8 km away and the latter being approximately 3 km away. Access from Swindon Lane and Hyde Lane is stated in the policy wording that it will contain internal roads and paths as required and agreed based on adopted local standards. The site does not currently have access to any bus services along Swindon Lane. However, mitigation has been included in emerging Policy SA 1 under C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to long-term positive effects. Given the size of the allocation and there have been identified problems with road capacity and traffic on the A4019 and A435⁹, it is likely that there could both short-term (during		development is larger than that proposed in Option 1 and therefore increases the likelihood of both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion.	

⁹ Gloucestershire City Council (2011) Gloucestershire's Local Transport Plan 2011-26. Online at <http://www.gloucestershire.gov.uk/CHttpHandler.ashx?id=44146&p=0> [accessed September 2013]

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1		Option 2		
	Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)		
	Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse		
	construction) and long-term negative effects on the existing road network with potential for congestion. There is the possibility of cumulative negative effects with allocation C3 if both are progressed. It has also been identified that the A435 corridor to Cheltenham is already congested at peak times with little scope for significant improvements due to constraints of neighbouring development ¹⁰ . However mitigation is offered in the policy under: C Infrastructure with the requirement to minimise the impact of the development on the existing transport network; and under E General with the requirement to submit a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel.				
9	WASTE AND POLLUTION	The majority allocation site is located on Greenfield agricultural land and therefore it is	-	This Option has similar effects as those identified for Option 1, however the	-

¹⁰ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 80.

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
Minimise pollution and waste to landfill		considered that there is limited potential for contamination to be present. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects. The Western edge of the site is adjacent to the main railway line linking Cheltenham to the North which could mean that noise may affect the dwelling houses proposed on the Western half of the site which are considered to be noise sensitive development. There is potential for temporary negative effects during construction on existing development. In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management		development proposed is much larger and therefore negative effects will be more certain. In addition, more of the development is on Brownfield land meaning that the potential for contamination could be slightly higher although mitigation for this is provided.	

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1		Option 2		
	Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)		
	Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse		
	plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General. Furthermore, the allocation site is located within the Cheltenham AQMA and it is likely that there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust. Mitigation is offered to reduce traffic as outlined under SA Objective 8. The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects on noise, air quality and construction waste in the short-term.				
10 THE ECONOMY	The allocation makes provision for 469 dwellings only although this could increase the supply of	O	As for Option 1.		O

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	labour in the area. The allocation will help to support the growth of business and could lead to an increase spending on goods and services in the area. However these effects are not considered to be significant.			
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Although the allocation site is on the town's edges, it is within 3 km of the centre and is close to the park and ride. Therefore the allocation is expected to support the vitality and viability of Cheltenham town centre. The effects are considered to be major positive.	++	As for Option 1, although the certainty of positive effects is greater given that the level of proposed development is greater.	++
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all.	+	As for Option 1.	+
13	SUSTAINABLE COMMUNITIES:	The allocation could provide an opportunity to reduce crime as employment land is to be	?	As for Option 1.	?

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse			
	SAFETY Reduce crime and the fear of crime	made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.			
14	HEALTH Improve access to health facilities and promote healthy	The allocation provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12). The site is over 20 minutes walk from health care facilities although in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services. Despite local health facilities not being specified, it is assumed that this is a consideration. Furthermore, there are requirements under C Infrastructure for provision with improvements for	+	As for Option 1.	+

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
		accessibility to open and green space as part of a wider GI network, including footpaths (Cheltenham's circular Way) and cycleways (see SA Objective No. 7). This will have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.			
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The allocation provides the opportunity to develop an additional 410 homes. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing; and that sustainable development principles; sustainable construction methods as well as requirements of the emerging Policy on design, must be incorporated. This will have major long-	++	As for Option 1, although more housing is to be developed (an additional 290) which will increase the likelihood of major long-term positive effects.	++

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1			Option 2	
	Description: H = 469 dwellings (18.6 ha)			Description: H =759 dwellings (30.1 ha)	
	Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435			Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
	term positive effects on housing for contributing to the locally identified need for housing ¹¹ .				
16 GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The allocation site is located on green field land which is currently used for agricultural purposes, and established recreation including rambling and dog-walking. Its development will ultimately remove this green space constituting a long-term major negative effect on green space. However, a large area has been set aside for green infrastructure and mitigation in emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects to minor or even neutral.	-		As for Option 1.	-

¹¹ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-ics.org/> [accessed September 2013]

Potential Strategic Allocation North Cheltenham C2					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 469 dwellings (18.6 ha)		Description: H =759 dwellings (30.1 ha)	
		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435		Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse	
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The allocation provides the opportunity for additional housing and employment opportunities which may attract a skilled workforce along with job creation which may maintain skills and enhance them. The effects are uncertain and will depend upon the type of industry that decides to develop the allocation site. In addition, the allocation site is over a 20 minute walk away from the nearest school. The requirements of emerging Policy SA 1 under C infrastructure should ensure that access issues are dealt with.	?	As for Option 1.	?
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Given the nature of the allocation, effects of this SA Objective are considered to be neutral.	○	As for Option 1.	○

Potential Strategic Allocation North Cheltenham C2		
Sustainability Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
	Option 1	Option 2
	Description: H = 469 dwellings (18.6 ha) Initial SA Summary Report (2011) Ref.: original broad location sub-area C2d – Land between the mainline railway and A435	Description: H =759 dwellings (30.1 ha) Initial SA Summary Report (2011) Ref.: original broad location sub-area C2c – Land to the West of Cheltenham Racecourse
Summary of Key Negative and Positive Effects for Sustainable Development: The Options are located on Land to the north of the Cheltenham, close to the Racecourse. There is little difference between the two Options other than more housing being proposed in Option 2 As a result the Options have similar effects on all of the SA objectives and they are considered to support the SA objectives of: Biodiversity; Climate change adaptation and mitigation; Sustainable communities – equality; Green space; and health, with uncertainty of effects on Education and skills. There is potential for minor negative effects on the SA objectives of: Resources – quality and use; and Waste and pollution. This is because the Options are located on Greenfield land in the Green Belt and in a drinking water protected area and because of the scale of the development proposed. In addition, there is the possibility of cumulative negative effects (short to long-term) with regard to landscape, resource use and transport if progressed with allocation C3. Key Negative Effects: - No likely significant effects have been identified. Key Positive Effects: - Both allocations are likely to lead to significant positive environmental effects on the following SA objectives City and town centres and Housing. The certainty of significant positive effects on housing is greater for this Option 2 given that almost double the amount of housing is proposed. Mitigation, Recommendations and Residual Effects for Plan-making - For Options 1 and 2 it would be recommended the traditional orchard is retained as part of any development scheme. - Initial findings of the HRA screening have found that given the location of the site it is unlikely that there will be significant effects on European sites.		

SA of Potential Strategic Allocation C3

Potential Strategic Allocation North West Cheltenham C3					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area. Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
1	BIODIVERSITY Safeguard and enhance biodiversity and improve	There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected ¹² . The site is predominantly arable and characterised by	+	As for Option 1, although the Option allocates a higher quantum of development and this could mean that the negative effects on biodiversity will be greater.	+

¹² Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation North West Cheltenham C3					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use		Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area.	
		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
connectivity between green spaces and functional habitats		small fields surrounded by hedgerows (Priority habitat¹³). The biodiversity quality is considered to be low/moderate¹⁴. Mitigation and enhancements to reduce any negative effects and improve the existing habitats or create new ones, are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment; and D Environment to use existing field boundaries, where practical. It has been identified that there are a number of protected species present on the allocation site¹⁵. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure and D Environment.d			

¹³ Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk> (accessed September 2013)

¹⁴ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 89

¹⁵ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 89

Potential Strategic Allocation North West Cheltenham C3							
Sustainability Objective	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty						
	Option 1			Option 2			
	Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use			Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area.			
	Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham			Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham			
	Given that there are no international, national or local nature conservation designations on the site or adjacent to the site and that there are opportunities to enhance biodiversity, mitigate negative effects on protected species and improve connectivity between green spaces and functional habitats, it is considered that the allocation could have a minor positive effect on the SA Objective of Biodiversity.						
2	CLIMATE CHANGE MITIGATION	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning		+	+	?	The effects are considered to be the same as for Option 1 despite the allocation being larger in size.

Potential Strategic Allocation North West Cheltenham C3					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area. Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to lead to minor positive effects in the long-term on climate change mitigation. The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation. Plus the additional scale of major development may better reach thresholds for carbon neutrality and/or provision of energy to National Grid.			
3	CLIMATE CHANGE ADAPTATION	Climate change adaption measures are implicit in the wording at beginning of	+	As for Option 1.	+

Potential Strategic Allocation North West Cheltenham C3					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use		Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area.	
		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
	Adapt to the consequences of climate change	emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes. As a result, the effects on climate change adaptation are expected to be minor positive.			
		Flooding is considered separately under SA Objective No. 4.			
4	FLOODING	The River Swillgate splits the site from East to North-west down the centre. The	○	As with Option 1 the majority of the site is in Flood zone 1 ¹⁷ . Part of the northern	-

¹⁷ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation North West Cheltenham C3					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use		Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area.	
		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
Manage and reduce flood risk and surface water run-off		development on the allocation site avoids the river and locates the development on the parts of the site where flooding from rivers is very unlikely (Flood Zone 1) ¹⁶ . However, given the size and scale of the development proposed on the allocation site, potential long-term negative effects on surface water could arise due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. As a result, it is considered that effects on flooding will be neutral.		development parcel is located in Flood zone 2 and 3 according to the Level 2 Strategic Flood Risk Assessment (2011) and it would be suggested that development be excluded from this area.	

¹⁶ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation North West Cheltenham C3					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use		Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area.	
		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The corridor of the river Swillgate is considered to provide a key feature in the landscape that contributes to the setting experienced by users of the public footpaths in the vicinity ¹⁸ . It can also be seen from the Cotswolds AONB and is considered to be of medium to low landscape sensitivity. There is also the possibility of negative cumulative effects on landscape if progressed with allocation C2. As a result, the allocation could have a major negative effect on landscape. Mitigation is provided 1) by part of the allocation itself and 2) in the wording of emerging Policy SA 1. 1) The allocation sets aside two large areas of land to act as a landscape buffer/ opportunity to create green infrastructure. 2) Emerging Policy SA 1 under C Infrastructure sets out requirement to provide Green Infrastructure which will again help screen the development from	-	As for Option 1, although allocated a higher quantum of development with a reduced Green Infrastructure area.	-

¹⁸ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 91

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	Option 1		Option 2	
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	the surrounding area and also help it to blend into the surrounding landscape. Also under D Environment there are requirements to use existing field boundaries where practical to try and maintain existing landscape features. In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its integration with existing developments and its relationship with surrounding countryside and to produce Green Infrastructure Framework. Moreover, further detailed wording has been included specifically relating to the allocation to ensure the protection of landscape and mitigation of any negative effects. The mitigation and measures presented to help protect landscape should ensure that long-term negative effects on landscape are minor. As mentioned in SA objective No. 4, the River Swillgate splits the site from East to North-west down the centre and could be a			

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	potential receptor for contaminants from surface water run-off generated by the impermeable surfaces of any development. In addition, part of the site lies within a drinking water protected area which is identified as being 'probably at risk' and partly lies on a minor aquifer which is considered to be of intermediate vulnerability. ¹⁹ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.				
	With regard to soils, the development will lead to the loss of soil as a direct result of development. In addition, it is in a nitrate vulnerable zone but this is not expected to be affected as a result of the development.				
6	NATURAL ENVIRONMENT AND	The effects on the use of natural resources will depend upon the design and	-	As for Option 1.	-

¹⁹ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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RESOURCES: USE		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
Minimise the use of natural resources including soil, water and Greenfield land through good design		construction methods to be used at the development management level. Certainty of positive effects and mitigation of negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment.			
		As mentioned previously, the site partly lies within a drinking water protected area which is identified as being 'probably at risk. ²⁰ ' Development could have minor negative effects on water use through potential for increased demand from new residential and community facilities.			
		In addition, the allocation site is located on green belt land which is currently used for agricultural purposes. It is considered to make a contribution/ limited contribution to the Green Belt ²¹ . Therefore the potential			

²⁰ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

²¹ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

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		major negative effects are less, the proposed GI will act as a landscape buffer; uncertainty as depends upon details of planning brief and masterplanning. There could be negative cumulative effects if progressed with allocation C2 through further loss of Green Belt land.					
		Also, the majority of the site contains grade 3 agricultural land with a large swathe of grade 2 across the middle of the site which is considered to be of very good value. As a result the effects on food production are expected to be minor negative in the long-term.					
7	HISTORIC ENVIRONMENT	There are no conservation areas or scheduled monuments on the allocation	+	-	As for Option 1, although the scale of the development is larger and therefore certainty	+	-

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Protect and enhance the area's distinctive historic environment	site ²² . There are however a few listed buildings directly on the site and adjacent to the eastern boundary is the Swindon Village Conservation Area. There is also a scheduled monument within close proximity to the south of the site. There is potential for minor negative effects on the setting of the listed buildings and the conservation area. Protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features. This could lead to long-term minor positive effects.		of negative effects on setting and on archaeology will be slightly greater. It is still assumed that this can be mitigated.	

²² English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

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	With regard to the scheduled monument, there are unlikely to be direct negative effects in terms of damage or alteration to the monument, however, as a result of its presence, there is likely to be associated archeology within close proximity to it. In the absence of a protection policy, the effects are considered to be minor negative.						
8	SUSTAINABLE	The allocation site is adjacent to the A4019 with a minor road running north/south		+	+	?	As for Option 1, although the scale of the development is larger and therefore certainty
				+	+	?	

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		Option 1		Option 2	
		Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use		Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area.	
TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	
		through the middle. It has good access to the M5 and good access to bus services with further scope for improvement, although access to the railway is poor. In addition, the allocation is to include a park and ride facility which will improve access to the main town centre. Furthermore, emerging Policy SA 1 under C Infrastructure requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to major long-term positive effects. Given the size of the allocation and there are identified problems with road capacity and traffic on the A4019 ²³ , it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. In addition, there are likely to be cumulative effects if		of negative effects be slightly greater.	

²³ Gloucestershire City Council (2011) Gloucestershire's Local Transport Plan 2011-26. Online at <http://www.gloucestershire.gov.uk/CHttpHandler.ashx?id=44146&p=0> [accessed September 2013]

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	progressed with allocation C2. However mitigation is offered in the policy under: C Infrastructure with the requirement to minimise the impact of the development on the existing transport network; and under E General with the requirement to submit a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel. It is considered that the effects will be neutral.				
9	WASTE AND POLLUTION	Although the site is predominantly on Greenfield agricultural land, there is a waste	-	This Option has similar effects as those identified for Option 1; however no	-

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Minimise pollution and waste to landfill	treatment facility for recycling metals and there have been two pollution incidents to the North-west²⁴ therefore it is considered that there is potential for contamination to be present. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects to minor. The Western edge of the site is adjacent to the main railway line linking Cheltenham to the North which could mean that noise may affect the dwelling houses proposed which are considered to be noise sensitive development. Also, the M5 is adjacent to the Western edge of the allocation site which also could have implications in terms of noise. Furthermore, there could be minor negative effects during construction with regard to noise. It is recommended that for this particular allocation, wording is inserted		development will occur on the Western edge near the M5.		

²⁴ Environment Agency (2013) Maps – Pollution. Online at (<http://maps.environment-agency.gov.uk>) [accessed September 2013]

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	to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation.			
	Furthermore, there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust during construction. Mitigation is offered to reduce traffic as outlined under SA Objective 8.			
	In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General.			

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	Option 1		Option 2		
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	Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham		
	Furthermore, the part of allocation site is located within the Cheltenham AQMA and it is likely that there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust. Mitigation is offered to reduce traffic as outlined under SA Objective 8.				
	The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects of noise, air quality and construction waste in the short-term.				
10	THE ECONOMY				
Ensure the availability of employment land and premises to encourage inward investment and	The allocation identifies 11.6 ha of land for employment uses and 89.25 ha of mixed use and is well located in that it is on the main route into Cheltenham. The allocation will help to support the growth of business and provide additional jobs in the area. It is expected that the allocation will have long-term major positive effects on the economy.	++	Although the area of employment land is much smaller at 23.3 ha, it is still considered to have major positive effects	++	

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	support growth of existing businesses				
11	CITY AND TOWN CENTRES	Although the allocation site is on the town's edges, it has good access to public transport (buses) allowing good connectivity to Cheltenham and the allocation also includes provision for park and ride. Therefore the allocation is expected to support the vitality and viability of Cheltenham town centre. The effects are considered to be major positive.	++	As for Option 1 as the level of housing proposed is similar.	++
	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations				
12	SUSTAINABLE COMMUNITIES: EQUALITY	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all.	++	As for Option 1.	++
	Reduce inequalities in wellbeing and opportunity				

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13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.	?	As for Option 1.	?
14	HEALTH	The allocation provides the opportunity for the development of good quality housing	+	As for Option 1.	+

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Improve access to health facilities and promote healthy	which will have indirect positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12).				
	The site is over 20 minutes walk from health care facilities ²⁵ although in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services that are essential for development to take place or which are needed to mitigate the impact of development at the site or neighbourhood level will be secured through Planning Obligations/CIL. Despite local health facilities not being specified, it is assumed that this is a consideration. The policy could be strengthened if health was specifically mentioned in the text. In addition, specific wording relating to the allocation seeks reinforcement of the Cheltenham Circular				

²⁵ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 83.

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	Footpath as a key route on the site, which will provide to opportunity for people to exercise and improve their health. Furthermore, there are requirements under C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This will have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.				
15	HOUSING	The allocation provides the opportunity to develop an additional 3,074 - 5042 homes. In addition, emerging Policy SA 1 under A	++	As for Option 1, as a similar number of houses are proposed.	++

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	Ensure everyone has access to a decent home that they can afford and meets their needs	Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing; and that sustainable development principles; sustainable construction methods as well as requirements of the emerging Policy on design, must be incorporated. This will have major long-term positive effects on housing. Major positive effects for contributing to the locally identified need for housing ²⁶ .			
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The allocation site is located on green belt land which is currently used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term major negative effect on green space. However, two large areas have been set aside for green infrastructure, and mitigation in emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is	+	As for Option 1, even though the land to be set aside to act as a land buffer/ area for green infrastructure is smaller.	+

²⁶ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-ics.org/> [accessed September 2013]

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	implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.				
17	EDUCATION AND SKILLS	The allocation provides the opportunity for additional housing which may attract a skilled workforce along with job creation which may maintain skills and enhance them. The effects are uncertain and will depend upon the type of industry that decides to develop the allocation site.	?	As for Option 1, although a school is included within the allocation which will lead to major positive effects on education and skills.	++
	Improve access to education and life-long learning and enhance skills	In addition, some parts of the allocation site are over a 20 minute walk away from the nearest school. The requirements of emerging Policy SA 1 under C infrastructure should ensure that access issues are dealt with.			
18	CULTURE AND TOURISM	Given the nature of the allocation, effects of this SA Objective are considered to be	○	As for Option 1.	○

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Protect and enhance cultural heritage and promote tourism	neutral.			

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	Option 1	Option 2
	Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area. Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham
Summary of Key Negative and Positive Effects for Sustainable Development: The Options are located on a parcel of Land to the north west of the Cheltenham. Both Options supports the SA objectives of Climate change adaptation; Green Space; and health with uncertainty of effects on Education and skills (Option 1 only) and Sustainable communities – safety. There is potential for minor negative effects on the SA objectives of Resources – use and quality and Waste and pollution, given the location of the Options on Greenfield land in the green belt, being partly on a groundwater drinking water protected area and the scale of the development proposed. Furthermore, Option 2 contains a small area of land in Flood zones 2 and 3. In addition, there is the possibility of cumulative negative effects (short to long-term) with regard to landscape, resource use (loss of Green belt and Greenfield land) and transport if progressed with allocation C2. Key Negative Effects: - No significant negative environmental effects have been identified. Key Positive Effects: - Both allocations are likely to lead to significant positive environmental effects on the following SA objectives: Climate change mitigation; the economy; City and town centres; Sustainable communities - equality and well being; and Housing. - Option 1 is more likely to have significant positive effects with regard to Education and skills as the allocation includes the provision of a school. Mitigation, Recommendations and Residual Effects for Plan-making - The Western edge of the Option 1 is adjacent to the main railway line linking Cheltenham to the North which could mean that noise may affect the dwelling houses proposed which are considered to be noise sensitive development. Also, the M5 is adjacent to the Western edge of the allocation site which also could have implications in terms of noise. It is recommended that for this particular allocation, wording is inserted to require a noise assessment to be carried out to identify possible noise impacts and suggest appropriate mitigation.		

Potential Strategic Allocation North West Cheltenham C3		
Sustainability Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
	Option 1	Option 2
	Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham	Description: H = 4825 dwellings (184.1 ha); E = 23 ha employment land; and a safeguarded area. Initial SA Summary Report (2011) Ref.: part of original broad location C3 – Land to the North West of Cheltenham
- Part of the northern development parcel of Option 2 is located in Flood zone 2 and 3 according to the Level 2 Strategic Flood Risk Assessment (2011) and it would be suggested that development be excluded from this area. - Initial findings of the HRA screening have found that although unlikely, there is the potential for significant effects on Dixon Woods SAC (6 km away) through increased recreational activity and will require further investigation on the sensitivity of the SAC to recreation. Furthermore, the River Swilgate and Hyde River flow through the site and eventually into the River Severn. The River Severn SAC/ SPA/ Ramsar and Walmore Common SPA/Ramsar are downstream so there is the potential for impacts alone on water quality. The Rivers flowing through the site should be protected and retained and any proposal for development should ensure that impacts on water quality and resources are minimised.		

SA of Potential Strategic Allocation West Cheltenham C5

Potential Strategic Allocation West Cheltenham C5				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: E = 36.5 ha of employment land		
		Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham		
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected ²⁷ . The site is predominantly arable and characterised by small fields surrounded by hedgerows with opportunities to enhance biodiversity. Mitigation and enhancements to reduce any negative effects and improve the existing habitats or create new ones, are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment; and D Environment to use existing field boundaries, where practical. The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment.		
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design. This is likely to lead to minor positive effects on climate change mitigation and could be further enhanced if renewable technologies to generate energy onsite are raised to a higher percentage than 10% per building. The effects also depend upon implementation and details of other policies. Overall, the urban		

²⁷ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation West Cheltenham C5				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: E = 36.5 ha of employment land		
		Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham		
	reducing their carbon footprint	extension approach will better promote possibilities for delivery of climate change mitigation.		
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design. As a result, the effects on climate change adaptation are expected to be minor positive. Flooding is considered separately under SA Objective No. 4.		+
4	FLOODING Manage and reduce flood risk and surface water run-off	The site is located in an area where flooding from rivers is very unlikely (Flood Zone 1) ²⁸ . However, given the size and scale of the development proposed on the allocation site, potential long-term negative effects on surface water could arise due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. As a result, it is considered that effects on flooding will be neutral.		0
5	NATURAL ENVIRONMENT AND	The area is not in or adjacent to any landscape designations and is described as being in an area of medium - low sensitivity landscape ²⁹ . Therefore the effects of the development are unlikely to be		+ -

²⁸ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

²⁹ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Potential Strategic Allocation West Cheltenham C5		
Sustainability Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
	Option 1	
	Description: E = 36.5 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham	
RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	significant and the landscape could be replaced or substituted – or improved. There is residential development to the east with a sewerage works to the south. As a result, the allocation could have a minor positive effect on landscape. Mitigation is provided 1) by part of the allocation itself and 2) in the wording of emerging Policy SA 1. 1) The allocation sets aside a large area of land to act as a landscape buffer/ opportunity to create green infrastructure. 2) Emerging Policy SA 1 under C Infrastructure sets out requirement to provide Green Infrastructure which will again help screen the development from the surrounding area and also help it to blend into the surrounding landscape. Also under D Environment there are requirements to use existing field boundaries where practical to try and maintain existing landscape features. In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its integration with existing developments and its relationship with surrounding countryside and to produce Green Infrastructure Framework. Moreover, further detailed wording has been included specifically relating to the allocation to ensure the protection of landscape: ■ Design and landscaping should help to produce a defensible green belt boundary to the west of the site ■ The development should be well screened to avoid visual impacts from key visual receptors The mitigation and measures presented to help protect landscape should ensure that long-term negative effects on landscape are minor. With regard to water, there are no watercourses present on the allocation site. However, mitigation is not provided by a Core Policy to protected water quality. However, the site lies within a drinking	

Potential Strategic Allocation West Cheltenham C5			
Sustainability Objective	Assessment of Effects		
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
	Option 1		
	Description: E = 36.5 ha of employment land		
	Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham		
	water protected area which is identified as being 'probably at risk' and a very small part lies on a minor aquifer which is considered to be of intermediate vulnerability. ³⁰ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.		
6	NATURAL ENVIRONMENT AND	The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Certainty of positive effects and mitigation of	-

³⁰ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation West Cheltenham C5				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1			
	Description: E = 36.5 ha of employment land			
	Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham			
	RESOURCES: USE	negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment.		
	Minimise the use of natural resources including soil, water and Greenfield land through good design	In addition, the allocation site is located on undeveloped, Green Belt land which is currently used for agricultural purposes. The Green Belt land here has been identified as providing a significant contribution to the Green Belt³¹. Emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and details of planning brief and masterplanning. This could reduce effects to minor negative. As mentioned previously, the site lies within a drinking water protected area which is identified as being 'probably at risk.'³² Development could have minor negative effects on water use through potential for increased demand from new residential and community facilities. With regard to soils, the development will lead to the loss of soil as a direct result of development. In addition, the majority of the site contains grade 3 agricultural land which is considered to be good to moderate value and such loss is of minor significance.		
7	HISTORIC	There are no conservation areas, listed buildings or scheduled monuments on or adjacent to the allocation site ³³ . In addition, protection for the historic environment is provided in the wording of		

³¹ ³¹ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

³² Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

³³ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Potential Strategic Allocation West Cheltenham C5				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1			
	Description: E = 36.5 ha of employment land			
	Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham			
ENVIRONMENT	emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features. Therefore the effects are expected to be neutral. However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.			
8 SUSTAINABLE TRANSPORT	The allocation site is adjacent to the B4634 with minor roads running along the eastern boundary. It has good access to the M5 although it has poor access to public transport although there are opportunities for improvement. However, mitigation has been included in emerging Policy SA 1 under			+ ?

Potential Strategic Allocation West Cheltenham C5			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Option 1	
		Description: E = 36.5 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham	
	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to long-term positive effects. Given the size of the allocation and that there are identified problems with congestion, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure with the requirement to minimise the impact of the development on the existing transport network; and under E General with the requirement to submit a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel. It is considered that the effects will be neutral.	
9	WASTE AND POLLUTION	Although the site is predominantly on Greenfield agricultural land, there is a sewage treatment facility to the south of the site ³⁴ and there is evidence of historic spreading of treated sewage sludge in this	--

³⁴ Environment Agency (2013) Maps – Pollution. Online at (<http://maps.environment-agency.gov.uk>) [accessed September 2013]

Potential Strategic Allocation West Cheltenham C5		
Sustainability Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
	Option 1	
	Description: E = 36.5 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham	
Minimise pollution and waste to landfill	area which can lead to heavy metal contamination³⁵. Therefore it is considered that there is potential for contamination to be present and that odour could be significant problem. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects to minor although it is uncertain at this stage. Furthermore wording has been inserted to ensure that employment should be of a type and nature that will not adversely affect, or be adversely affected by, waste management uses at Hayden Sewage Treatment Works. The Eastern edge of the site is adjacent residential development that may be sensitive to noise during construction. This could result in short-term minor negative effects. In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by the additional businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General. Furthermore, the part of allocation site is located within the Cheltenham AQMA and it is likely that there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust/ smoke. Mitigation is offered to reduce traffic as outlined under SA Objective 8.	

³⁵ Planning Application (1996) Online at <http://glostext.gloucestershire.gov.uk/CeListDocuments.aspx?MID=5271&F=Application+No+96+3333+0416+FUL+-+Hayden+Sewage+Treatment+Works%2C+Boddington%2C+Nr+Cheltenham%24embed%24.htm&DF=09/07/1996&A=1&R=0> [accessed September 2013]

Potential Strategic Allocation West Cheltenham C5			
Sustainability Objective	Assessment of Effects		
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
	Option 1		
	Description: E = 36.5 ha of employment land		
	Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham		
	The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects of noise, air quality and construction waste in the short-term.		
10	THE ECONOMY	The allocation identifies 36.5 ha of land for employment uses is well located in that it is on the main route into Cheltenham. The allocation will help to support the growth of business and provide additional jobs in the area. It is expected that the allocation will have long-term major positive effects on the economy.	++
	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses		

Potential Strategic Allocation West Cheltenham C5				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: E = 36.5 ha of employment land		
		Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham		
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Although the allocation site is on the town's edge, it is well located in relation to the main settlement with opportunities to improve public transport (see SA Objective No. 8). Therefore the allocation is expected to support the vitality and viability of Cheltenham town centre. The effects are considered to be major positive.		++
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing employment opportunities and an improved transport network to create better access to facilities and services for all. At present, the effects are considered to be uncertain and may depend on negotiations at the development management level.		?
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and by providing attractive places to work where people will feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.		?

Potential Strategic Allocation West Cheltenham C5				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Option 1		
		Description: E = 36.5 ha of employment land		
		Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham		
14	HEALTH	The allocation provides the opportunity for the creation of jobs which will have minor indirect positive effects on health.		
	Improve access to health facilities and promote healthy	Furthermore, there are requirements under C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This will have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.		
15	HOUSING	The allocation only makes provision for employment land only.		
	Ensure everyone has access to a decent home that they can afford and meets their needs			
16	GREEN SPACE	The allocation site is located on green belt land which is currently used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term minor negative effect on green space. However, a large area has been set aside for green infrastructure, and mitigation in		

Potential Strategic Allocation West Cheltenham C5			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Option 1	
		Description: E = 36.5 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham	
	Create, enhance, protect, connect and improve access to open spaces	emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce the negative effects to neutral or even bring about a minor positive effect due to enhancement measures.	
17	EDUCATION AND SKILLS	The allocation provides the opportunity for job creation which may maintain skills and provide schemes provide training to enhance them. The effects are uncertain and will depend upon the type of industry that decides to develop the allocation site.	?
	Improve access to education and life-long learning and enhance skills		
18	CULTURE AND TOURISM	Given the nature of the allocation, effects of this Sa Objective are considered to be neutral.	○
	Protect and enhance cultural heritage and promote tourism		

Potential Strategic Allocation West Cheltenham C5	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty
	Option 1
	Description: E = 36.5 ha of employment land
	Initial SA Summary Report (2011) Ref.: part of original broad location C5 – Land to the West of Cheltenham
Summary of Key Negative and Positive Effects for Sustainable Development: The Option is located on a parcel of Land to the west of the Cheltenham. The Option supports the SA objectives of Climate change adaptation and mitigation; Transport; Green Space; and health with uncertainty of effects on: Historic environment; Education and skills; and Sustainable communities – safety and equalities. There is potential for minor negative effects the SA objectives of Resources – use and quality, as the Option is located landscape on Greenfield land in the Green Belt and as a result of the large scale of the development proposed. Key Negative Effects: One significant negative environmental effect has been identified with regard to Waste and pollution. This is due to the site being adjacent to a sewage treatment facility and there is evidence of historic spreading of treated sewage sludge in this area which can lead to heavy metal contamination³⁶. Therefore it is considered that there is potential for contamination to be present and that odour could be significant issue. Key Positive Effects: ▪ The allocation is likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; the economy; and City and town centres. Mitigation, Recommendations and Residual Effects for Plan-making ▪ Initial findings of the HRA screening have found that given the location of the site it is unlikely that there will be significant effects on European sites.	

³⁶ Planning Application (1996) Online at <http://glostext.gloucestershire.gov.uk/CeListDocuments.aspx?MID=5271&F=Application+No+96+3333+0416+FUL+-+Hayden+Sewage+Treatment+Works%2C+Boddington%2C+Nr+Cheltenham%24embed%24.htm&DF=09/07/1996&A=1&R=0> [accessed September 2013]

SA of Potential Strategic Allocation South Cheltenham C6B

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected ³⁷ . The site is predominantly arable and characterised by small fields surrounded by hedgerows and a number of traditional orchards (Priority Habitat ³⁸) with opportunities to enhance biodiversity. Mitigation and enhancements to reduce any negative effects and improve the existing habitats or create new ones, are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; E General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment; and D Environment to use existing field boundaries, where practical.	++	As for Option 1 although slightly less land (3.55 ha) is allocated for development and therefore the land set aside for green infrastructure is larger. This provides the opportunity for greater major positive effects to be realized for biodiversity.	++

³⁷ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

³⁸ Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk> (accessed September 2013)

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1		Option 2		
	Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
	The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment.				
2	CLIMATE CHANGE MITIGATION	There is potential to reduce contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development principles and sustainable construction methods. This is likely to lead to minor positive effects in the long-term on climate change mitigation.	+	As for Option 1.	+
	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of			

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
		climate change mitigation.			
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design. As a result, the effects on climate change adaptation are expected to be minor positive. Flooding is considered separately under SA Objective No. 4.	+	As for Option 1.	+
4	FLOODING Manage and reduce flood risk and surface water run-off	The site is located in an area where flooding from rivers is very unlikely (Flood Zone 1) ³⁹ . However, given the size and scale of the development proposed on the allocation site, potential long-term negative effects on surface water could arise due to the imposition of impermeable surfaces which	○	As for Option 1 although slightly less land (3.55 ha) is allocated for development and therefore this should reduce any negative effects identified in Option 1.	○

³⁹ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
		could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic Flood Risk Assessment which specifically addresses the management of surface water on the site. As a result, it is considered that effects on flooding will be neutral.			
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	The area is not in or adjacent to any landscape designations and is described as being in an area of medium sensitivity	-	As for Option 1 although slightly less land (3.55 ha) is allocated for development and therefore this should reduce any negative	-

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1			Option 2	
	Description: H = 800 dwellings (37.3 ha)			Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
Protect and improve the quality of natural resources including soil, water and landscape	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham			Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
	landscape ⁴⁰ with residential development to the north and south. Despite the proximity of the urban edge of Cheltenham it has a rural feel. There are a number of fine, mature trees present on the site which help to create a 'parkland' landscape. Certain parts of the site can be viewed from the AONB which may have effects on its' setting although the majority of the site is screened by existing hedgerows and mature trees. As a result, the allocation could have a major negative effect on landscape. Mitigation is provided 1) by part of the allocation itself and 2) in the wording of emerging Policy SA 1. 1) The allocation sets aside a large area of land to act as a landscape buffer/opportunity to create green infrastructure. 2) Emerging Policy SA 1 under C Infrastructure sets out requirement to provide Green Infrastructure which will again help screen the development from the surrounding area and also help it to blend into the surrounding			effects identified in Option 1.	

⁴⁰ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1		Option 2		
	Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
	landscape. Also under D Environment there are requirements to use existing field boundaries where practical to try and maintain existing landscape features. In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its integration with existing developments and its relationship with surrounding countryside and to produce Green Infrastructure Framework. Moreover, further detailed wording has been included specifically relating to the allocation to ensure the protection of landscape:				
	■ Development of this site should preserve older and veteran trees wherever possible. ■ Landscaping should ensure a green buffer to the south of the site facing on to Chargrove Lane				
	The mitigation and measures presented to help protect landscape should ensure that long-term negative effects on landscape are reduced. However, given the distance of the				

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
		designation (approximately 800m away), presence of screening (hedges and mature trees) and that the site is bounded, the effects are considered to be minor negative. Further mitigation could be appropriate in the form of the policy requiring only low density and low rise development.			
		With regard to soils, the development will lead to the loss of soil as a direct result of development.			
		The site lies within a drinking water protected area which is identified as being 'probably at risk'. ⁴¹ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.			
6	NATURAL ENVIRONMENT AND RESOURCES: USE	The effects on the use of natural resources will depend upon the design and construction	-	As for Option 1 although slightly less land (3.55 ha) is allocated for development and	-

⁴¹ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1			Option 2	
	Description: H = 800 dwellings (37.3 ha)			Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
Minimise the use of natural resources including soil, water and Greenfield land through good design	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham			Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
	methods to be used at the development management level. Certainty of positive effects and mitigation of negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment.			therefore this should reduce any negative effects identified in Option 1.	
	The allocation site is located on Greenfield land which is currently used for agricultural purposes and is in the Green Belt. The area in which the site lies is considered to provide a significant contribution to the Green Belt ⁴² . Therefore, the allocation does not support this SA objective. However, emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and details of planning brief and masterplanning.				
	In addition, the majority of the site contains				

⁴² ⁴² Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

Potential Strategic Allocation South Cheltenham C6B						
Sustainability Objective	Assessment of Effects					
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty					
	Option 1			Option 2		
	Description: H = 800 dwellings (37.3 ha)			Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham			Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
	grade 3 agricultural land which is considered to be of good to moderate value and such a loss is considered to be of minor significance.					
7	HISTORIC ENVIRONMENT	There are no conservation areas or scheduled monuments on or adjacent to the allocation site ⁴³ . There is one listed building on the allocation site and another to the south-west outside the boundary. Protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological		As for Option 1.		
	Protect and enhance the area's distinctive historic environment					

⁴³ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

Potential Strategic Allocation South Cheltenham C6B									
Sustainability Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty							
		Option 1				Option 2			
		Description: H = 800 dwellings (37.3 ha)				Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)			
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham				Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham			
		features. Therefore the effects are expected to be minor positive.							
		However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.							
8	SUSTAINABLE TRANSPORT	The allocation site is adjacent to the Up Hatherley Way with a minor road running along the southern boundary. It has good access to the A46 and bus services and there are opportunities for improvement. However, mitigation has been included in emerging Policy SA 1 under C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to major long-term positive effects.	+	?		As for Option 1 although given that employment land is allocated in this Option, there are likely to be more heavy goods vehicles using roads. Careful transport planning will be needed to ensure that noise and vibration are not an issue for existing and proposed residential development.	+	?	
	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car		+				+		
		Given the size of the allocation and that there are identified problems with congestion on							

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1			Option 2	
	Description: H = 800 dwellings (37.3 ha)			Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham			Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
	the A46, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in the policy under: C Infrastructure with the requirement to minimise the impact of the development on the existing transport network; and under E General with the requirement to submit a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel. It is considered that the effects will be neutral.				
9	WASTE AND POLLUTION	The majority of the allocation site is located on Greenfield agricultural land and therefore	-	As for Option 1.	-

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1		Option 2		
	Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)		
Minimise pollution and waste to landfill	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
	it is considered that there is limited potential for contamination to be present. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects.				
	The northern and south-eastern edges of the site are adjacent residential development that may be sensitive to noise during construction. This could lead to short-term negative effects.				
	In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by the additional housing generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under				

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective	Assessment of Effects				
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
	Option 1		Option 2		
	Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
	E General.				
	Furthermore, although the allocation site is not within the Cheltenham AQMA it is adjacent to it and it is likely that there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust. Mitigation is offered to reduce traffic as outlined under SA Objective 8.				
	The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects of noise, air quality and construction waste in the short-term.				
10	THE ECONOMY	The allocation makes provision for 822 dwellings only although this could increase	O	The allocation identifies 17 ha of land for employment uses and makes provision for	++

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	the supply of labour in the area. The allocation will help to support the growth of business and could lead to an increase spending on goods and services in the area. However these effects are not considered to be significant.		422 dwellings which could increase the supply of labour in the area. The allocation will help to support the growth of business, could provide additional jobs and could lead to an increase spending on goods and services in the area. The allocation will help to support the growth of business and provide additional jobs in the area. It is expected that the allocation will have long-term major positive effects on the economy.	
11	CITY AND TOWN CENTRES	Although the allocation site is on the town's edge, it is well located in relation to the main settlement with opportunities to improve public transport (see SA Objective No. 8). Therefore the allocation is expected to support the vitality and viability of Cheltenham town centre. The effects are considered to be major positive.	++	As for Option 1.	++
	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations				
12	SUSTAINABLE COMMUNITIES:	The allocation could provide a chance to reduce inequalities in wellbeing and	+	As for Option 1.	+

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
	EQUALITY Reduce inequalities in wellbeing and opportunity	opportunity through providing good quality housing and an improved transport network to create better access to facilities and services for all.			
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as good quality housing can create attractive places to live which people would like to care for and where people can feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.	?	As for Option 1 although in addition to providing housing, this option should provide employment opportunities and this may reduce crime further.	?
14	HEALTH Improve access to health facilities and promote healthy	The allocation provides the opportunity for the development of good quality housing which will have positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12). The site under 20 minutes walk from health care facilities. In addition, in the wording of emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including	+	As for Option 1, although in addition to providing housing, this option should provide employment opportunities and this will have further indirect positive effects on health.	+

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
		facilities and services that are essential for development to take place or which are needed to mitigate the impact of development at the site or neighbourhood level will be secured through Planning Obligations/CIL. Despite local health facilities not being specified, it is assumed that this is a consideration. The policy could be strengthened if health was specifically mentioned in the text.			
		Furthermore, there are requirements under C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This will have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.			
15	HOUSING	The allocation provides the opportunity to develop an additional 822 homes. In	++	As for Option 1 although less housing is allocated which will mean that positive	++

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
	Ensure everyone has access to a decent home that they can afford and meets their needs	addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing and that sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. This will have major long-term positive effects on housing for contributing to the locally identified need for housing ⁴⁴ .		effects will not be as great as in Option 1. However, it will still lead to major long-term positive effects on housing as it contributes to the locally identified need for housing ⁴⁵ .	
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The allocation site is Greenfield land which is currently used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term minor negative effect on green space. However, a large area has been set aside for green infrastructure, and mitigation in emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing	+	As for Option 1 although slightly less land (3.55 ha) is allocated for development and therefore this should reduce any negative effects identified in Option 1.	+

⁴⁴ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [accessed September 2013]

⁴⁵ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [accessed September 2013]

Potential Strategic Allocation South Cheltenham C6B						
Sustainability Objective		Assessment of Effects				
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty				
		Option 1		Option 2		
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)		
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
		space, that landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.				
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The allocation provides the opportunity for additional housing which may attract a skilled workforce along with job creation which may maintain skills and enhance them. The effects are considered to be uncertain at this stage as it will depend upon whether the additional housing will bring in skilled workers. In addition, the allocation site is close to a school although capacity of the school to accommodate extra pupils is not known at this stage. The requirements of emerging Policy SA 1 under C infrastructure should ensure that access issues are dealt with.	?	As for Option 1 although the likelihood of minor positive effects are greater as employment land is allocated. This could provide the opportunity for people to improve and/or gain new skills.	+	?
18	CULTURE AND TOURISM	Given the nature of the allocation, effects of this SA Objective are considered to be	○	As for Option 1.		○

Potential Strategic Allocation South Cheltenham C6B					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
		Option 1		Option 2	
		Description: H = 800 dwellings (37.3 ha)		Description: H = 422 dwellings (16.75 ha) and employment land (17 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
Protect and enhance cultural heritage and promote tourism	neutral.				

Summary of Key Negative and Positive Effects for Sustainable Development:

The Options are located on a parcel of Land to the South West of the Cheltenham. Both Options support the SA objectives of Climate change adaptation and mitigation; Green Space; Historic environment; Sustainable communities – equalities; and health with uncertainty of effects on: Education and skills; and Sustainable communities – safety. There is potential for minor negative effects the SA objectives of Resources – use and quality, and Waste and pollution given the location of the Options on Greenfield land in the Green Belt which is of medium landscape sensitivity and the scale of the development proposed.

Key Negative Effects:

- No significant negative environmental effects have been identified.

Key Positive Effects:

- Both Options are likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Transport; and town centres; and housing.
- Option 2 is likely to lead to significant positive environmental effects on the economy.

Mitigation, Recommendations and Residual Effects for Plan-making

- With regard to landscape, further mitigation could be appropriate in the form of the policy requiring only low density and low rise development.
- Initial findings of the HRA screening have found that there is a need to consider potential impacts of development on the A46 which runs along the eastern boundary of the site and adjacent to the Cotswold Beechwoods SAC (approximately 5.5 km from the site). Given the proximity of the SAC to Gloucester, development at this site is unlikely to significantly increase the levels of recreation at the SAC alone.

SA of Potential Strategic Allocation South Cheltenham C6

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty							
		Option 1		Option 2		Option 3		Option 4	
		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
1	BIODIVERSITY	There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected ⁴⁶ . The site is predominantly arable with many	+	As for Option 1, although it allocates nearly double the amount of dwellings which could increase certainty of negative effects on biodiversity. However, mitigation is provided and therefore it is not	+	As for Option 1, although it allocates nearly double the amount of dwellings which could increase certainty of negative effects on biodiversity. However, mitigation is provided and therefore it is not expected to change the nature of the	+	As for Option 1, although it allocates nearly double the amount of dwellings which could increase certainty of negative effects on biodiversity. The development footprint is more than 10 ha less than Option 2 with more land set aside for	+

⁴⁶ Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation South Cheltenham C6							
Sustainability Objective	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty						
	Option 1		Option 2		Option 3		Option 4
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham
	smallholdings, orchards and allotment/market gardens or nurseries ⁴⁷ . The deciduous trees and orchards with hedgerows (all Priority habitats) ⁴⁸ . The mosaic of habitat types could make mitigation difficult and the development would result in the loss of one of the orchards leading to minor negative		expected to change the nature of the effect. Furthermore, the Option includes an addition mitigation measure to preserve existing orchards and older/ veteran trees wherever possible and viable.		effect. Similar to Option 2 although with a slightly higher number of dwellings. Furthermore, the Option includes an addition mitigation measure to preserve existing orchards and older/ veteran trees wherever possible and viable.		Green Infrastructure. However, mitigation is provided and therefore it is not expected to change the nature of the effect.

⁴⁷ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 113

⁴⁸ Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk> (accessed September 2013)

Potential Strategic Allocation South Cheltenham C6							
Sustainability Objective	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty						
	Option 1		Option 2		Option 3		Option 4
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham
	effects. The Hatherley Brook runs down the centre of the site which could provide habitat for a number of protected species. Mitigation and enhancements to reduce any negative effects and improve the existing habitats or create new ones, are required in the wording of emerging Policy SA 1 under: C Infrastructure to provide green infrastructure; E						

Potential Strategic Allocation South Cheltenham C6							
Sustainability Objective	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty						
	Option 1		Option 2		Option 3		Option 4
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham
	General to submit a Green Infrastructure Framework to illustrate how the development will maximize opportunities to enhance the environment; and D Environment to use existing field boundaries, where practical. In addition, it is stated that the development will contain a green corridor following the line of the Hatherley Brook which will lead to						

Potential Strategic Allocation South Cheltenham C6							
Sustainability Objective	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty						
	Option 1		Option 2		Option 3		Option 4
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)
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	positive long-term effects on biodiversity. It would be recommended that the traditional orchard between Kidnappers Lane and Farm lane be included as part of the landscape/ buffer.						
	The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/						

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	Option 1		Option 2		Option 3		Option 4		
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	disturbance. Mitigation is also provided in the wording of emerging Policy SA 1 under: C Infrastructure; and D Environment.								
2	CLIMATE CHANGE	There is potential to reduce	+	The effects are considered to be	+	As for option 2.	+	As for Option 2.	+

Potential Strategic Allocation South Cheltenham C6								
Sustainability Objective	Assessment of Effects							
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	Option 1		Option 2		Option 3		Option 4	
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)	
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MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	contribution to climate change on the site through compliance with the wording in beginning of emerging Policy SA 1 which this allocation sits under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design; and A Housing which requires incorporation of sustainable development		the same as for Option 1 despite the allocation being double the size. Although additional scale could improve choice of low carbon technologies.					

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	Option 1		Option 2		Option 3		Option 4
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	principles and sustainable construction methods. This is likely to lead to minor positive effects in the long-term on climate change mitigation.						
	The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.						

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective		Assessment of Effects							
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		Option 1		Option 2		Option 3		Option 4	
		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
3	CLIMATE CHANGE ADAPTATION	Climate change adaption measures are implicit in the wording at beginning of emerging Policy SA 1 under: D Environment which requires on-site renewable energy schemes (at least 10% per building onsite) and sustainable design;	+	As for Option 1 – higher quantum of development places additional pressures on flood capacities but could be mitigated by aiming for water neutral development (see SA Objective No. 4 below).	+	As for Option 2.	+	As for Option 2.	+
	Adapt to the consequences of climate change	and A Housing which requires incorporation of sustainable development principles and sustainable construction							

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	methods in line with the Homes and Communities Agency's recommended level in the Code for Sustainable Homes. As a result, the effects on climate change adaptation are expected to be minor positive.								
	Flooding is considered separately under SA Objective No. 4.								
4	FLOODING	The Hatherley brook splits the site	O	As for Option 1, although it	-	As for Option 2.	-	As for Option 2 although it excludes	-

Potential Strategic Allocation South Cheltenham C6									
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Manage and reduce flood risk and surface water run-off	north/south down the centre and the development on the allocation site avoids the brook. The Environment Agency's website indicates that the north-eastern part of the allocation site is at risk from extreme flooding events from a drain running along its eastern boundary. In addition, given the size and scale of the development proposed on the allocation site, potential long-term		allocates nearly double the amount of dwellings which could increase certainty of negative effects on flooding. For this reason the effects are considered to be minor negative. It would be recommended to include the requirement to achieve flood storage betterment.				a small parcel of land adjacent to Merlin Way which is at risk of flooding. As a result, the minor negative effects identified for Options 2 and 3 would be less with development here.		

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	Option 1		Option 2		Option 3		Option 4
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)
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	negative effects on surface water could arise due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation is provided in the wording of emerging Policy SA 1 under E General with the requirement to include a Strategic						

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		Option 1		Option 2		Option 3		Option 4	
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		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
		Flood Risk Assessment which specifically addresses the management of surface water on the site. As a result, it is considered that effects on flooding will be neutral.							
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	The site is predominantly arable with many smallholdings, orchards and	-	As for Option 1, although it allocates nearly double the amount of dwellings and	--	As for Option 2.	--	As for Option 2 although the development footprint is more than 10 ha less with more	--

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	Option 1		Option 2		Option 3		Option 4		
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Protect and improve the quality of natural resources including soil, water and landscape	allotment/market gardens or nurseries ⁴⁹ . The smallholdings and orchards are generally surrounded by trees and hedgerows. The Cotswolds AONB is also adjacent to the southern boundary and its landscape sensitivity is considered to be high-medium ⁵⁰ .		given the proximity of the AONB and the surrounding areas' high landscape sensitivity it is considered to have major negative effects on landscape.				land set aside for Green Infrastructure.		

⁴⁹ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 133

⁵⁰ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

Potential Strategic Allocation South Cheltenham C6							
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	Development here could erode this setting by permanently altering its appearance from rural to residential. In addition it would also alter its landscape character by changing its use from food production to built form. As a result, the allocation could have a major negative effect on landscape. Mitigation is provided 1) by part						

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	of the allocation itself and 2) in the wording of emerging Policy SA 1. 1) The allocation sets aside a large area of land to act as a landscape buffer/ opportunity to create green infrastructure. 2) Emerging Policy SA 1 under C Infrastructure sets out requirement to provide Green Infrastructure which will again help screen the development from the surrounding						

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	area and also help it to blend into the surrounding landscape. Also under D Environment there are requirements to use existing field boundaries where practical to try and maintain existing landscape features. In addition, under E General there is a requirement to produce a masterplan for the whole site to facilitate a comprehensive scheme, its						

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	integration with existing developments and its relationship with surrounding countryside and to produce Green Infrastructure Framework. Moreover, further detailed wording has been included specifically relating to the allocation to ensure the protection of landscape and mitigation of any negative effects. The mitigation and measures presented to help						

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	protect landscape should ensure that long-term negative effects on landscape are minor. As mentioned in SA objective No. 4, the Hatherley Brook runs through the centre of the allocation and could be a potential receptor for contaminants from surface water run-off generated by the impermeable surfaces of any development.						

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	Protection for water quality is not included in any Core policy and therefore effects are considered to be minor negative.						
	The site lies within a drinking water protected area which is identified as being 'probably at risk' and lies on a minor aquifer which is considered to be of intermediate vulnerability. ⁵¹						
	Development						

⁵¹ Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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	could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.								
	With regard to soils, the development will lead to the loss of soil as a direct result of development.								
6	NATURAL ENVIRONMENT	The effects on the use of natural	-	As for Option 1, although more	-	As for Option 2.	-	As for Option 2 although the	-

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AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	resources will depend upon the design and construction methods to be used at the development management level. Certainty of positive effects and mitigation of negative can be achieved in part by the requirements of emerging Policy SA 1 under A Housing and under D Environment. As mentioned previously, the site lies within a drinking		resources will be used because double the houses are proposed to be built.				development footprint is more than 10 ha less.		

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	water protected area which is identified as being 'probably at risk.' ⁵² Development could have minor negative effects on water use through potential for increased demand from new residential and community facilities. The allocation site is located on Greenfield land which is currently used for						

⁵² Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed September 2013]

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	agricultural purposes and is in the green belt. Therefore, the allocation does not support this SA objective. However, emerging Policy SA 1 D20 and 21 require a fragmented development edge where practical, and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of other Core Policies and						

Potential Strategic Allocation South Cheltenham C6												
Sustainability Objective		Assessment of Effects										
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty										
		Option 1		Option 2		Option 3		Option 4				
		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)				
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham				
		details of planning brief and masterplanning. In addition, the majority of the site contains grade 2 and 3 agricultural land which is considered to be of very good/good to moderate value and such a loss is considered to be of minor significance.										
7	HISTORIC ENVIRONMENT Protect and	There are no conservation areas or scheduled monuments on or	+	-	As for Option 1, although it allocates nearly double the amount	+	-	As for Option 1, although it allocates nearly double the amount of dwellings	-	As for Option 2 although the development footprint is more than	+	-

Potential Strategic Allocation South Cheltenham C6							
Sustainability Objective		Assessment of Effects					
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		Option 1	Option 2	Option 3	Option 4		
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	enhance the area's distinctive historic environment	adjacent to the areas proposed for employment or housing on the allocation site ⁵³ . There are however a few listed buildings located within the area set aside as a landscape/ opportunity for green infrastructure. There is also a scheduled monument within close proximity to the south of the site. There is potential for minor	of dwellings which could increase certainty of negative effects. However, mitigation is provided and therefore it is not expected to change the nature of the effect.	which could increase certainty of negative effects (slightly more than Option 2). The greater quantum of the development could have a detrimental effect on the setting of the listed buildings identified for the other options. Also another listed building, Brizen Farmhouse, is directly adjacent an area proposed for housing for this option which could		10 ha less.	

⁵³ English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

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	Option 1		Option 2		Option 3		Option 4
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	negative effects on the setting of the listed buildings. Protection for the historic environment is provided in the wording of emerging Policy SA 1 under: D Environment with requirements to preserve and enhance local character and valued aspects of the historic environment; and C Infrastructure with the requirement to provide green				affect its setting. As a result, even with mitigation proposed by emerging Policy SA 1, the Option is considered to have minor long-term negative effects on the historic environment.		

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	Option 1		Option 2		Option 3		Option 4
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	infrastructure to include measures to mitigate any detrimental impact on heritage features on and adjacent to the site, including listed buildings, scheduled ancient monuments and other archaeological features. In addition, wording has been inserted to require that development at Leckhampton should be focused at higher density on the less sensitive						

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	Option 1	Option 2	Option 3	Option 4			
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	northern areas also conserving and enhancing the setting of the Scheduled Ancient Monument. This could lead to long-term minor positive effects. With regard to the scheduled monument, there are unlikely to be direct negative effects in terms of damage or alteration to the monument, however, as a result of its presence, there is						

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	Option 1			Option 2			Option 3			Option 4			
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	likely to be associated archeology within close proximity to it. In the absence of a protection policy, the effects therefore are considered to be minor negative.												
8	SUSTAINABLE	The allocation site has good access	+	?	As for Option 1, although it	+	-	As for Option 1, although it allocates	+	-	As for Option 2 although the	+	-

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		Option 1		Option 2		Option 3		Option 4	
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		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
TRANSPORT	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	to the A46 and other minor roads but there is limited access to public transport. Mitigation has been included in emerging Policy SA 1 under C Infrastructure which requires maximization of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to long-term positive effects.		allocates nearly double the amount of dwellings which could increase certainty of negative effects in terms of exacerbating existing congestion problems. Therefore in terms of congestion it is considered to have a minor negative effect.		nearly double the amount of dwellings (slightly more than Option 2) which could increase certainty of negative effects in terms of exacerbating existing congestion problems. Therefore in terms of congestion it is considered to have a minor negative effect.		development footprint is more than 10 ha less.	
		Given the size of the allocation and that there are indentified problems with			115/VII				Enfusion

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		Option 1		Option 2		Option 3		Option 4	
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9	WASTE AND POLLUTION Minimise pollution and waste to landfill	Given the varied nature of uses within the allocation the potential for contamination is not known. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques. As a result effects are expected to be neutral.	-	As for Option 1, although it allocates nearly double the amount of dwellings which could increase certainty of negative effects in terms of exacerbating existing. However, it is not expected to change the nature of the effect.	-	As for Option 1, although it allocates nearly double the amount of dwellings (slightly more than in Option 2) which could increase certainty of negative effects in terms of exacerbating existing. However, it is not expected to change the nature of the effect.	-	As for Option 2 although the development footprint is more than 10 ha less.	-

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	Option 1		Option 2		Option 3		Option 4
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	The allocation site is surrounded by residential development that may be sensitive to noise during construction. This may have short-term minor negative effects.						
	In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in						

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	the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General.						
	Furthermore, the						

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	site is located within the Cheltenham AQMA and it is likely that there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust. Mitigation is offered to reduce traffic as outlined under SA Objective 8. The effects are considered to be minor negative.						

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10	THE ECONOMY	The allocation identifies 6.8 ha of land for employment uses and makes provision for 558 dwellings which could increase the supply of labour in the area. The allocation will help to support the growth of business, could provide additional jobs and	++	As for Option 1, although it provides for double the amount of houses and this will increase the likelihood of the positive effects.	++	As for Option 1, although it provides for double the amount of houses (slightly more than Option 2) and this will increase the likelihood of the positive effects.	++	No employment land has been allocated.	○
	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses								

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	could lead to an increase spending on goods and services in the area. The allocation will help to support the growth of business and provide additional jobs in the area. It is expected that the allocation will have long-term major positive effects on the economy.								
11	CITY AND TOWN CENTRES	Although the allocation site is on	++	As for Option 1, although it provides	++	As for Option 1, although it provides	++	As for Option 2.	++

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	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	the town's edges, there is potential to improve connectivity to Cheltenham centre. Therefore the allocation is expected to support the vitality and viability of Cheltenham town centre. The effects are considered to be major positive.		for double the amount of houses and this will increase the likelihood of the positive effects.		for double the amount of houses (slightly more than Option 2) and this will increase the likelihood of the positive effects.			
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing	++	As for Option 1.	++	As for Option 1.	++	As for Option 1.	++

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		good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all.							
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This	?	As for Option 1.	?	As for Option 1.	?	As for Option 1.	?

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	will provide attractive places to live and work which people will want to look after and where people will feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.								
14	HEALTH	The allocation provides the opportunity for the	++	As for Option 1, although it provides for double the	++	As for Option 1, although it provides for double the	++	As for Option 2.	++

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Improve access to health facilities and promote healthy	development of good quality housing which will have indirect positive effects on health and provision of affordable housing will help to reduce health inequalities (and see SA Objective No. 12).		amount of houses and this will increase the likelihood of the positive effects.		amount of houses (slightly more than Option 2) and this will increase the likelihood of the positive effects.			
	The site under 20 minutes walk from health care facilities ⁵⁴ . In addition, in the wording of							

⁵⁴ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (December 2011) Joint Core Strategy: Gloucester, Cheltenham and Tewkesbury, Initial Sustainability Appraisal Summary Report, Chapter JCS Broad Locations Sustainability Appraisal, pp. 118.

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	emerging Policy SA 1 under C Infrastructure there is a requirement for the provision of contributions for local infrastructure including facilities and services that are essential for development to take place or which are needed to mitigate the impact of development at the site or neighbourhood level will be secured through Planning Obligations/CIL.						

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	Despite local health facilities not being specified, it is assumed that this is a consideration. The policy could be strengthened if health was specifically mentioned in the text. Furthermore, there are requirements under C Infrastructure for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths						

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		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
		and cycleways (see SA Objective No. 7). This will have positive effects on health with major positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.							
15	HOUSING Ensure everyone	The allocation provides the opportunity to	++	As for Option 1, although 1080 homes have been	++	As for Option 1, although 1169 homes have been	++	As for Option 1, although an additional 1101	++

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty							
		Option 1		Option 2		Option 3		Option 4	
		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
has access to a decent home that they can afford and meets their needs	develop an additional 558 homes. In addition, emerging Policy SA 1 under A Housing requires that affordable housing will be provided in line with the emerging Policy on affordable housing and that sustainable development principles and sustainable construction methods in line with the Homes and Communities Agency's recommended		allocated and this will increase the likelihood of the positive effects.		allocated and this will increase the likelihood of the positive effects.		homes have been allocated and this will increase the likelihood of the positive effects.		

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective	Assessment of Effects								
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty								
	Option 1		Option 2		Option 3		Option 4		
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
	level in the Code for Sustainable Homes and in line with the provisions of the emerging Policy on design must be incorporated. This will have major long-term positive effects on housing for contributing to the locally identified need for housing ⁵⁵ .								
16	GREEN SPACE	The allocation site is Greenfield land which is currently	+	This Option will result is the loss of almost double the	-	This Option will result is the loss an approximately 15 ha	-	This Option will result is the loss an approximately 11 ha	-

⁵⁵ Cambridge Centre for Housing and Planning (2013) Objectively Assessed Need Range of 33,200-37,400. Online at <http://www.gct-jcs.org/> [accessed September 2013]

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective	Assessment of Effects								
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty								
	Option 1		Option 2		Option 3		Option 4		
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)		
	Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		
Create, enhance, protect, connect and improve access to open spaces	used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term minor negative effect on green space. However, a large area has been set aside for green infrastructure, and mitigation in emerging Policy SA 1 under C Infrastructure requires further enhancement is carried out to existing space, that		green space than in Option 1 and could increase the pressure from recreational activities on green spaces in the area.		more green space than in Option 1 and could increase the pressure from recreational activities on green spaces in the area.		more green space than in Option 1 and could increase the pressure from recreational activities on green spaces in the area.		

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty							
		Option 1		Option 2		Option 3		Option 4	
		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
		landscaping and structural planting is carried out throughout the development and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.							
17	EDUCATION AND SKILLS	The allocation site is close to a school although capacity	++	As for Option 1.	++	As for Option 1.	++	As for Option 1.	++

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty							
		Option 1		Option 2		Option 3		Option 4	
		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land		Description: H = 1075 dwellings (43.7 ha)	
		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
Improve access to education and life-long learning and enhance skills		of the school to accommodate extra pupils is not known at this stage. However, the allocation does make provision for a new local centre and primary school which will have major long-term positive effects on the community. The requirements of emerging Policy SA 1 under C infrastructure should ensure that any access issues to education are dealt with.							

Potential Strategic Allocation South Cheltenham C6									
Sustainability Objective		Assessment of Effects							
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty							
		Option 1		Option 2		Option 3		Option 4	
		Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham		Description: H = 1075 dwellings (43.7 ha) Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Given the nature of the allocation, effects of this SA Objective are considered to be neutral.	○	As for Option 1.	○	As for Option 1.	○	As for Option 1.	○
Summary of Key Negative and Positive Effects for Sustainable Development: The Options are located on Land to the south of Cheltenham which is adjacent to the Cotswolds AONB. All Options support the SA objectives of: Biodiversity; Climate Change Adaptation and Mitigation; Historic Environment; Sustainable Communities – safety; and Education and Skills, with uncertainty of effects on Sustainable Communities - Safety. There is potential for minor negative effects the SA objectives of Flooding (Option 2, 3 and 4); Transport (Option 2, 3 and 4); Green space (Options 2, 3 and 4); Resources – use and quality; and Waste and pollution, given the location of the Options on Greenfield land in the green belt, being located partly in a groundwater drinking water protected area, and the scale of the development proposed. Key Negative Effects: - Options 2, 3 and 4 are likely to have significant negative effects on the SA objective of Resources – quality as the larger quantum of development could affect the AONB and the buffer between Cheltenham and the AONB. Key Positive Effects: - All Options are likely to lead to significant positive environmental effects on the following SA objectives: The Economy; City and Town									

Potential Strategic Allocation South Cheltenham C6				
Sustainability Objective	Assessment of Effects			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty			
	Option 1	Option 2	Option 3	Option 4
	Description: H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	Description: H=1101 dwellings (49 ha), E= 6.8 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	Description: H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham	Description: H = 1075 dwellings (43.7 ha) Initial SA Summary Report (2011) Ref.: part of original broad location C6 – Land to the South of Cheltenham
Centres; Education and Skills Sustainable Communities - equality and well being; Health; and Housing. Mitigation, Recommendations and Residual Effects for Plan-making - For all Options, is it recommended that the traditional orchard between Kidnappers Lane and Farm lane should be included as part of the landscape/ buffer. - Initial findings of the HRA screening have found that there is a need to consider potential impacts of development on the A46 which runs along the eastern boundary of the site and adjacent to the Cotswold Beechwoods SAC (5.5 km away from the site). This is because there is potential for increased levels of atmospheric pollution on the A46 which is within 200m of the SAC. Given the proximity of the SAC to Gloucester, development at this site is unlikely to significantly increase the levels of recreation at the SAC alone. Hatherley Brook runs through the site and eventually flows into the River Severn. The River Severn SAC/ SPA/ Ramsar and Walmore Common SPA/Ramsar are downstream so there is the potential for impacts alone on water quality. Hatherley Brook should be protected and retained and any proposal for development should ensure that impacts on water quality and resources are minimised.				

Appendix IX: Sustainability Appraisal (SA) of Policies (Strategic, Core, Allocations, Delivery)

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
--	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
- +	The SA Objectives 5, 6, 9, 13 and 14 consider more than one topic and as a result the plan could have different effects upon each topic considered. For example, Objective 6 includes a number of topics including soils, previously developed land, water use and Green Belt. A site/ policy within the plan could have a negative effect on the topic Green Belt but also have a positive effect on previously developed land and therefore this could lead to two symbols being shown.	

Summary SA

Strategic Policies

Draft JCS Strategic Policy ¹	Sustainability Appraisal Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, Landscape	Resources, Soil, water	Historic	Transport	Waste, Pollution	Economy	City, Town Centres	Communities – Equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
SP 1 – SCALE OF NEW DEVELOPMENT	+	+	○	+	+	+	○	++	+	++	+	+	+	+	++	+	+	+
SP 2 – DISTRIBUTION NEW DEVELOPMENT	+	+	○	+	+	+	○	++	+	++	+	+	+	+	++	+	+	+
SP 3 – DELIVERY	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○

¹ Some of the policy headings have been summarised.

Core Policies

Draft JCS Core Policy ²	Sustainability Appraisal Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town Centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Ambition 1 – A Thriving Economy																		
E 1 – EMPLOYMENT	○	+	+	+	+	+	○	+	○	++	+	+	+	+	○	○	+	+
E 2 – VITALITY & VIABILITY CENTRES	○	○	○	○	○	○	○	○	○	+	++	○	○	○	+	○	+	+
Ambition 2 – A Sustainable Natural and Built Environment																		
S 1 – SUSTAINABLE DEVELOPMENT	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
S 2 – FLOOD RISK MANAGEMENT	++	○	++	++	?	○	+	+	+	+	+	○	+	+	+	+	+	+
S 3 – DESIGN & CONSTRUCTION	+	?	+	+	+	?	+	○	?	+	?	+	+	?	+	?	?	+
S 4 – DESIGN REQUIREMENTS	+	○	+	○	+	○	+	++	○	+	+	++	++	+	+	++	○	+
S 5 – GREEN BELT	+	○	○	○	+	+	-	+	○	○	+	○	○	○	○	+	○	+
S 6 – LANDSCAPE	+	○	○	○	++	○	+	○	○	○	○	○	○	○	○	+	○	+
S 7 – COTSWOLD AONB	+	○	○	○	+	+	+	○	○	○	○	○	○	○	○	+	○	+

² Some of the policy headings have been summarised.

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Draft JCS Core Policy ²	Sustainability Appraisal Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town Centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
S 8 – BUILT AND HISTORIC	○	○	○	○	+	○	++	+	○	+	○	○	○	○	○	+	○	+
S 9 – BIODIVERSITY	++	○	+	+	+	+	○	○	+	○	○	○	○	+	○	?	○	+
S 10 – GREEN INFRASTRUCTURE	++	+	+	+	+	○	○	+	+	+	+	+	○	+	○	++	○	+
S 11 – RENEWABLE/ LOW CARBON ENERGY	○	++	○	○	○	○	○	○	○	+	○	○	○	○	○	○	○	○
Ambition 3 – A Healthy, Safe and Inclusive Community																		
C 1 – RESIDENTIAL DEVELOPMENT	○	○	○	○	○	+	○	+	○	○	○	○	+	○	+	○	-	○
C 2 – HOUSING MIX AND STANDARDS	○	○	○	○	○	○	○	○	○	○	○	++	○	+	++	○	○	○
C 3 – AFFORDABLE HOUSING	○	○	○	○	○	○	○	○	○	○	○	++	○	○	++	○	○	○
C 4 – GYPSY, TRAVELLER & SHOWPEOPLE	○	○	○	○	○	○	○	○	○	?	○	+	○	○	+	○	○	○
C 5 – COMMUNITY FACILITIES	○	○	○	○	○	○	○	+	○	+	+	++	○	++	○	++	++	+
C 6 – SUPPORTING HEALTHY LIFESTYLES AND WELLBEING	○	○	+	+	+	○	○	+	+	○	○	+	+	++	+	++	○	○
C 7 – TRANSPORT	○	○	○	○	○	○	○	+	○	○	○	○	+	○	○	○	○	○

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Draft JCS Core Policy ²	Sustainability Appraisal Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town Centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
REQUIREMENTS																		

Allocation Policy

Draft JCS Delivery Policy	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
SA 1 – REQUIRMENTS FOR STRATEGIC ALLOCATIONS	+	+	+	++	+	○	○	○	○	++	○	○	○	+	○	+	+	+

Delivery Policies

Draft JCS Delivery Policy ³	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, landscape	Resources, soil, water	Historic	Transport	Waste, Pollution	Economy	City, town centres	Communities – equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
D 1 – INFRASTRUCTURE	○	○	○	+	○	○	○	+	○	+	+	+	○	+	+	+	+	+
D 2 – ASSESSMENTS	++	++	○	++	+	○	++	++	+	○	○	+	○	++	○	++	○	○
D 3 – TRANSPORT ASSESSMENTS, PLANS	○	○	○	○	○	○	○	+	+	○	○	○	+	+	○	○	○	○
D 4 – MASTER PLANS AND DESIGN BRIEFS	?	?	?	?	+	+	?	++	?	+	+	+	?	+	+	?	+	?

³ Some of the policy headings have been summarised.

Strategic Policies

POLICY SP 1 – SCALE OF NEW DEVELOPMENT During the plan period provision will be made for 33,200 new homes and land to support 21,800 new jobs. This is to be delivered through development within existing urban areas enabled via District Plans and the urban extensions to Cheltenham and Gloucester and the provision of strategic allocations at Ashchurch. This strategy aims to locate jobs near to the economically active population, increasing sustainability, reducing out-commuting thereby reducing carbon emissions from unsustainable car use. The appropriate level of new homes and employment will be monitored and a review undertaken 5 years following the adoption of the JCS and periodically thereafter, taking into account the most up to date evidence available at that time.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocations. This should help safeguard biodiversity assets which are more likely to be found in the undeveloped areas within the JCS area and where there are likely to be negative effects on biodiversity these are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 9 and S 10. Specific measures to protect biodiversity have been provided for each urban extension and strategic allocation. Therefore the effects on this SA Objective are considered to be minor positive.	+	None.
2	CLIMATE CHANGE MITIGATION	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocations which	+	None.

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	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	reduce dependency on fossil fuels. Any new development is likely to increase carbon emissions during the construction and operation. However, requirements for development to reduce their contributions to climate change are set under Policy S 3. Therefore the effects are considered to be minor positive.		
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Requirements for new development to adapt to climate change are set under a number of JCS Policies S 2, S 3 and S 4. Overall, therefore, the effects are considered to be neutral.	○	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	Flooding is a key issue for the JCS area and any new development could increase the risk of flooding in the medium and long-term. However, the urban focus of development should prevent a greater loss of permeable surfaces. In addition, it is anticipated that any negative effects on this SA Objective will be addressed by compliance with Policy S 2 which also has a requirement for betterment of the existing water storage capacity. Therefore the policy is considered to have minor positive effects on flooding.	+	None.
5	NATURAL ENVIRONMENT AND RESOURCES:	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocation. This should	+	None.

Appendix IX: Sustainability Appraisal (SA) of Policies (Strategic, Core, Allocations, Delivery)

	QUALITY Protect and improve the quality of natural resources including soil, water and landscape	help protect the rural landscape of the JCS area and where there are likely to be negative effects on natural resources these are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 6, and S 10. Specific measures to protect landscape and other natural resources have been provided for each urban extension and strategic allocation. Therefore the effects on this SA Objective are considered to be minor positive.		
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocation. This should help protect the natural resources of the JCS area and encourage the redevelopment of previously developed land. Furthermore, where there are likely to be negative effects on natural resources these are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 6, S 10, C 1 and C 6. Therefore the effects on this SA Objective are considered to be minor positive.	+	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	New housing and employment development can have both negative and positive effects on the historic environment. It is expected that any negative effects will be prevented or mitigated through the implementation of other JCS Policies including S 6 and S 8. As a result the policy is considered to have neutral effects on this SA Objective.	○	None.
8	SUSTAINABLE TRANSPORT	The addition of new housing and jobs may increase traffic and congestion in the JCS area although the urban focus should reduce the need to travel by car	++	None.

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	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	and can greater provide opportunities to make sustainable transport methods more viable. In addition, it is expected that any negative effects will be addressed and measures for improvement of the transport system will be secured through other JCS Policies including S 4, C 7, and D 1 – 3. Therefore, the Policy is expected to lead to major positive effects.		
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	Any new development is likely to increase pollution and waste in both the short (construction) and long-terms (operation and decommissioning). These are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 6, S 10, C 1 and C 6. In addition, the urban focus should reduce journeys by private car thus minimizing negative effects of emissions on air quality. This is likely to lead to minor positive effects on this SA Objective.	+	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The policy is likely to lead to major positive effects on this SA Objective as it makes provision for land to support 21,800 jobs over the plan period. This figure will be reviewed to ensure that economic needs of the JCS area will be continually addressed.	++	None.
11	CITY AND TOWN CENTRES	Supporting the provision of land for new homes and jobs in urban areas is likely to support the vitality and viability of town centres. Therefore it is likely to lead to minor	+	None.

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	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	positive effects on this SA Objective.		
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The provision of new housing and jobs is likely to help reduce inequality in wellbeing and opportunity across the urban areas of the JCS is leading to minor positive effects on this SA Objective.	+	None.
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The provision of an additional 21,800 jobs may help reduce the occurrence of crime. Therefore the Policy is considered to lead to minor positive effects on this SA Objective.	+	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The urban focus is more likely to ensure that new development is situated near to existing healthcare facilities meaning that access is not an issue. Furthermore, any negative effects on this SA Objective resulting from additional housing including increased pressure on existing healthcare facilities is likely to be mitigated by other JCS Policies including S 3, S 4, C 5 and C 6. Therefore, the policy is likely to have minor positive effects n this SA Objective.	+	None.

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15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The policy is likely to lead to major positive effects on this SA Objective as it makes provision for 33,000 over the plan period. This figure will be reviewed to ensure that the housing needs of the JCS area will be continually addressed.	++	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The urban focus could lead to the redevelopment of previously developed land which could bring previously inaccessible spaces into public access. Also development on the edge of urban areas through the urban extensions and strategic allocations can increase access to Green Infrastructure and facilitate the connectivity between the countryside and urban areas. However, providing land for housing and employment could result in the loss of green space although, protection and/ or mitigation is provided by other JCS Policies including S 10, C 6 and S 4. Therefore this Policy is considered likely to lead to minor positive effects on this SA Objective.	+	None.
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The urban focus is more likely to ensure that new development is situated near to existing educational facilities meaning that access is not an issue. Any negative effects on this SA Objective resulting from additional housing including increased pressure on existing education facilities is likely to be mitigated by other JCS Policies including C 5. Therefore the effects are considered to be minor positive.	+	None.
18	CULTURE AND TOURISM	The urban focus optimises opportunities to enhance the established cultural and tourism qualities of the urban	+	None.

	Protect and enhance cultural heritage and promote tourism	areas and increases accessibility. Any negative effects are expected to be mitigated/ prevented by other JCS Policies including S 8, E 2 and S 10. Therefore the effects are considered to be minor positive.		
Summary of Key Negative & Positive Effects for Sustainable Development: The Policy is likely to lead to major significant positive effects on the SA Objectives of Economy and Housing as the Policy makes provision for both new housing and land to support new jobs. The Policy directs new development into existing urban areas with the exception of urban extension and strategic allocations and as a result it expected to lead to minor positive effects on the majority of SA Objectives. In addition, with the protection and/or mitigation provided by other JCS Policies, the policy is expected to have neutral effects on Climate Change Adaptation and Historic Environment.				

POLICY SP 2 - DISTRIBUTION OF NEW DEVELOPMENT The amount of development and its distribution is set out in table SP.2a below. The urban extensions and strategic allocations are shown on the Proposals Plan. To support their economic roles as the principal providers of jobs, services and homes, development will be focussed at Gloucester and Cheltenham, including urban extensions to these areas. Over the plan period to 2031, Gloucester and its urban extensions will accommodate 13,100 new homes and land for up to 10,800 new jobs Cheltenham and its urban extensions will accommodate 10,000 new homes and land for up to 5,500 new jobs Within Tewkesbury Borough development will accommodate 10,100 new homes and land for up to 5,500 jobs over the plan period to 2031. This will be met: • Through urban extensions to Gloucester and Cheltenham • Through strategic allocations at Ashchurch, • Through development at Tewkesbury town in accordance with its role as a market town, and • Through development at rural service centres and service villages. Rural Service Centres and Service Villages as identified in table SP.2b below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and neighbourhood plans, proportional to their size and function and also reflecting their proximity and access to Cheltenham and Gloucester. Over the plan period to 2031, The Rural Service Centres will accommodate 1860 new homes, and The Service Villages will accommodate 880 new homes. In the remainder of the rural area, Policy C1 will apply.			
		Assessment of Effects	
Sustainability Objective		Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and	Mitigation Possibilities, Residual Effects Recommendations for plan-making

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		synergistic); Uncertainty		
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocations. This should help safeguard biodiversity assets which are more likely to be found in the undeveloped areas in the JCS area and where there are likely to be negative effects on biodiversity these are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 9 and S 10. Specific measures to protect biodiversity have been provided for each urban extension and strategic allocation. Therefore the effects on this SA Objective are considered to be minor positive.	+	None.
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocations which reduce dependency on fossil fuels. Any new development is likely to increase carbon emissions during the construction and operation. However, requirements for development to reduce their contributions to climate change are set under Policy S 3. Therefore the effects are considered to be minor positive.	+	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Requirements for development to adapt to climate change are set under a number of JCS Policies S 2, S 3 and S 4. Therefore the effects are considered to be minor positive.	○	None.
4	FLOODING	Flooding is a key issue for the JCS area and any new development could increase the risk of flooding in the medium and long-term. However, the urban focus of	+	None.

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	Manage and reduce flood risk and surface water run-off	development should prevent a greater loss of permeable surfaces. In addition, it is anticipated that any negative effects on this SA Objective will be addressed by compliance with Policy S 2 which also has a requirement for betterment of the existing water storage capacity. Therefore the policy is considered to have minor positive effects on flooding.		
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocation. This should help protect the rural landscape of the JCS area and where there are likely to be negative effects on natural resources these are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 6, and S 10. Specific measures to protect landscape and other natural resources have been provided for each urban extension and strategic allocation. Therefore the effects on this SA Objective are considered to be minor positive.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The Policy aims to direct new development mainly towards existing urban areas with the exception of the urban extensions and strategic allocation. This should help protect the natural resources of the JCS area and encourage the redevelopment of previously developed land. Furthermore, where there are likely to be negative effects on natural resources these are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 6, S 10, C 1 and C 6. Therefore the effects on this SA Objective are considered to be minor positive.	+	None.

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7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	New housing and employment development can have both negative and positive effects on the historic environment. It is expected that any negative effects will be prevented or mitigated through the implementation of other JCS Policies including S 6 and S 8. As a result the policy is considered to have neutral effects on this SA Objective. Cheltenham has almost double the number of listed buildings compared to Tewkesbury and almost four times the number than Gloucester. The majority of which are contained within Cheltenham's urban area and therefore new development within Cheltenham must be carefully managed using Policies S 6 and S 8.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The addition of new housing and jobs may increase traffic and congestion in the JCS area although the urban focus should reduce the need to travel by car and can greater provide opportunities to make sustainable transport methods more viable. In addition, it is expected that any negative effects will be addressed and measures for improvement of the transport system will be secured through other JCS Policies including S 4, C 7, and D 1 – 3. Therefore, the Policy is expected to lead to major positive effects.	++	None.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	Any new development is likely to increase pollution and waste in both the short (construction) and long-terms (operation and decommissioning). These are expected to be prevented or mitigated by other JCS Policies including S 3, S 4, S 6, S 10, C 1 and C 6. In addition, the urban focus should reduce journeys by private car thus minimizing negative effects of emissions on air quality. This is likely to lead to minor positive effects on this SA Objective.	+	None.

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		Cheltenham is particularly sensitive to increases in levels of emissions as the whole of the town is designated as an AQMA. Particular attention will need to be given to any additional development to ensure that pollution does not add to existing problems.		
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The policy is likely to lead to major positive effects on this SA Objective as it makes provision for land to support 21,800 jobs over the plan period. This figure will be reviewed to ensure that economic needs of the JCS area will be continually addressed.	++	None.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Supporting the provision of land for new homes and jobs in urban areas is likely to support the vitality and viability of town centres. Therefore it is likely to lead to minor positive effects on this SA Objective.	+	None.
12	SUSTAINABLE COMMUNITIES:	The provision of new housing and jobs is likely to help reduce inequality in wellbeing and opportunity across	+	None.

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	EQUALITY Reduce inequalities in wellbeing and opportunity	the urban areas of the JCS is leading to minor positive effects on this SA Objective.		
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The provision of an additional 21,800 jobs may help reduce the occurrence of crime. Therefore the Policy is considered to lead to minor positive effects on this SA Objective.	+	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The urban focus is more likely to ensure that new development is situated near to existing healthcare facilities meaning that access is not an issue. Furthermore, any negative effects on this SA Objective resulting from additional housing including increased pressure on existing healthcare facilities is likely to be mitigated by other JCS Policies including S 3, S 4, C 5 and C 6. Therefore, the policy is likely to have minor positive effects on this SA Objective.	+	None.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The policy is likely to lead to major positive effects on this SA Objective as it makes provision for 33,000 over the plan period. This figure will be reviewed to ensure that the housing needs of the JCS area will be continually addressed.	++	None.
16	GREEN SPACE	The urban focus could lead to the redevelopment of previously developed land which could bring previously	+	None.

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	Create, enhance, protect, connect and improve access to open spaces	inaccessible spaces into public access. Also development on the edge of urban areas through the urban extensions and strategic allocations can increase access to Green Infrastructure and facilitate the connectivity between the countryside and urban areas. However, providing land for housing and employment could result in the loss of green space although, protection and/ or mitigation is provided by other JCS Policies including S 10, C 6 and S 4. Therefore this Policy is considered likely to lead to minor positive effects on this SA Objective.		
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The urban focus is more likely to ensure that new development is situated near to existing educational facilities meaning that access is not an issue. Any negative effects on this SA Objective resulting from additional housing including increased pressure on existing education facilities is likely to be mitigated by other JCS Policies including C 5. Therefore the effects are considered to be minor positive.	+	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The urban focus optimises opportunities to enhance the established cultural and tourism qualities of the urban areas and increases accessibility. Any negative effects are expected to be mitigated/ prevented by other JCS Policies including S 8, E 2 and S 10. Therefore the effects are considered to be minor positive.	+	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The Policy sets out the broad locations and the level of new development that will be distributed in those broad locations. The main focus is on existing settlements including Cheltenham, Gloucester, Tewkesbury Town and a number of Rural Service Centres and Villages. As a result the effects identified are similar to those identified for Policy SP 1 with significant positive effects for Housing and the Economy and minor positive effects on the majority of other SA Objectives. All the main urban areas of Cheltenham, Gloucester and Tewkesbury suffer from flooding issues with Cheltenham also having particular sensitivities with regard to air quality and heritage, and any development must				

be carefully managed here using the other JCS Policies including S 2, S 6 and S 8.

POLICY SP 3 - DELIVERY & REVIEW The three Councils will review the Joint Core Strategy at regular intervals to ensure that this strategy will be delivered and that it continues to meet the needs of the area. If Monitoring Reports show that allocated development sites are not coming forward in a timely manner, we will consider the following: • working with developers and infrastructure providers to remove obstacles to the delivery of sites • seeking alternative sources of funding if lack of infrastructure is delaying development, • the early release of safeguarded land, • identifying alternative site(s) in general accordance with the distribution strategy of this plan as set out in policy SP2, • reviewing the strategy or elements of it, • undertaking a further green belt review, • working with neighbouring authorities under the Duty to Co-operate.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.	○	None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.

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4	FLOODING	There are unlikely to be any significant environmental effects.	☒	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There are unlikely to be any significant environmental effects.	☒	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	☒	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	☒	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	☒	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	☒	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	☒	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	☒	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	☒	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	☒	None.
14	HEALTH	There are unlikely to be any significant environmental effects.	☒	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	☒	None.

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16	GREEN SPACE	There are unlikely to be any significant environmental effects.	○	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The aim of the Policy is to require that the three Councils review the Joint Core Strategy at regular intervals to ensure that this strategy will be delivered and that it continues to meet the needs of the area. Through ensuring that the plan is implemented effectively, it is likely to improve the certainty of the plan's effects on the environment and socio-economic factors.				

Core Policies

Ambition 1 – A Thriving Economy

POLICY E 1 – EMPLOYMENT

This Joint Core Strategy supports the provision of 21,800 additional jobs to 2031. These jobs will primarily be outside the traditional B class uses and may not necessarily have land requirements. To facilitate employment growth 84 ha of additional employment land is being allocated in urban extensions and strategic allocations. In addition further capacity is provided within the urban areas to be allocated through the District Plans. This will ensure that a range and choice of deliverable employment opportunities will be provided to meet the needs of small, medium and larger scale business requirements.

Planning permission for employment uses will be **granted** for:

- on urban extensions and strategic allocations in accordance with **Policy SP.2**;
- new premises or the conversion of existing buildings within Cheltenham, Gloucester and Tewkesbury Town which provide a range of types and sizes of units including start-up and grow on spaces;
- the re-use of rural buildings where the proposals accord with other policies in the development plan.

Major office development will be directed to the town centres of Gloucester and Cheltenham in the first instance in line with the spatial strategy. Other opportunities will be considered reflecting the emerging Local Enterprise Partnership Growth Plan.

Any proposals for a **change of use** to an alternative use will need to demonstrate that:

- the site has been actively marketed for employment uses for a period of 12 months, and
- it is no longer viable as an employment site, and
- it is not suitable for other employment generated use, and
- in the case of retail that it complies with the sequential test set out in Policy E2, and
- it can be clearly demonstrated that it would contribute to a more sustainable pattern of development in the local area as a consequence of the appropriateness of the proposed use to the location

In **rural service centres and service villages** proposals for small scale employment development will be supported where they are of an appropriate size and scale.

In the wider countryside,

I. New employment development should be located within or adjacent to a settlement and be of an appropriate scale and character. II. Employment generating farm diversification projects which are of an appropriate scale and use will be supported particularly where it the reuse of appropriate redundant, non-residential buildings.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The policy seeks to support the provision of additional jobs to meet needs in the JCS area. It focuses on granting permission for employment uses in urban areas as well as on the strategic allocations which have been thoroughly assessed through the SA process and mitigation has been put in place to reduce negative effects on biodiversity. In addition, it also advocates the conversion of existing buildings in both the urban and rural areas rather than encourage new premises to be built on new parcels of land which could result in the loss of habitats and species. Furthermore, it requires that major office development will be directed towards the centres of Gloucester and Cheltenham in the first instance which will also help reduce any negative effects on biodiversity. Therefore this policy is expected to have neutral effects on Biodiversity.	○	Mitigation for biodiversity is also provided by Policy S 9.
2	CLIMATE CHANGE MITIGATION	The policy encourages the re-use and conversion of existing buildings and therefore this can reduce carbon emissions, for example, through the need not to use as	+	None.

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	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	many materials with embodied CO ₂ and a reduced number of HGVs. Where the conversion involves the need for additional floorspace, this could provide opportunities to improve the carbon footprint of the existing building in line with other JCS Policies such as Policy S 11 and Policy S 3. These policies also provide mitigation for any new development advocated by the policy which could result in negative effects on this SA Objective. As a result it is considered to lead to minor positive effects on this SA Objective given the opportunities for betterment. In addition placing employment development close to where people live will help reduce use of car and therefore carbon emissions.		
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Similarly, the policy provides opportunities to adapt existing buildings to the consequences of climate change where conversion requires additional space to be created in line with policies such as Policy S 2 and Policy S 3. These policies also provide mitigation for any new development advocated by the policy which could result in negative effects on this SA Objective. As a result it is considered to lead to minor positive effects on this SA Objective given the opportunities for betterment.	+	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	The policy encourages the re-use and conversion of existing buildings. Therefore it could have positive effects on flooding through limited increase in impermeable surfaces causing increased surface water run-off which could result in flooding. Any negative effects on this SA Objective resulting from new premises being built are expected to be mitigated by the other CS policies including S 2 and S 3.	+	None.
5	NATURAL ENVIRONMENT AND RESOURCES:	The Policy supports this SA Objectives as it seeks to direct development within or adjacent to existing settlement footprints and also within existing buildings. It	+	None.

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	QUALITY Protect and improve the quality of natural resources including soil, water and landscape	also requires that any new employment development should be of an appropriate scale, size and character to the receiving settlement. Any negative effects resulting from employment development on the quality of other natural resources such as soil and water are expected to be mitigated by the other CS policies including: C 6; S 2; S 4; S 7; and S 10.		
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The Policy supports this SA Objective as it seeks to direct development within or adjacent to existing settlement footprints. The policy also encourages the re-use and conversion of existing buildings and therefore minimizes the use of natural resources and encourages the use of previously developed land leading to minor positive effects on this SA Objective. Any negative effects on this SA Objective resulting from new premises being built are expected to be mitigated by the other CS policies including C 6, S 2, and S3.	+	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	New employment development does have the potential to negatively affect the historic environment. However, the policy itself does include some mitigation as it requires that any new employment development should be of an appropriate scale, size and character to the receiving settlement. Furthermore, Policy S 8 provides further mitigation for the historic environment and therefore it is considered that the policy will have neutral effect on this SA Objective.	○	None.

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8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The policy seeks to focus employment development within or adjacent to existing settlements where it is likely that they would be easily accessible and where public transport is already available. Concentrating development within existing settlements can make sustainable modes of transport more viable. As a result the policy is considered to support this SA Objective. Any negative effects caused by a potential increase in traffic as a result of new employment development, are mitigated by Policies C 7 and D 3.	+	None.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	New development is likely to increase waste arisings and also pollution in an area and the policy encourages development into existing settlements where air quality can be an issue. This is a particular issue in Cheltenham as the whole of the town is designated as an AQMA. Mitigation for waste arisings and pollution is provided by a certain extent by the requirements set out in Policy S 3 and further mitigation for pollution is set out in Policy C 6. Therefore it is expected that the effects will be neutral on this SA Objective.	○	None.
10	THE ECONOMY	The policy fully supports this SA Objective and will lead to major positive effects in the short, medium and long-	++	None.

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	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	term on the Economy. Policy E 2 works hand in hand with this policy to produce positive synergistic effects to support investments and growth of businesses in centres.		
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The policy encourages employment development within or adjacent to existing settlement and seeks office developments in town centres which will help support their ongoing role and function. Therefore supports this SA Objective leading to minor positive effects. As mentioned above, this policy works hand in hand with Policy E 2 producing positive synergistic effects.	+	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The policy is likely to help reduce inequalities in job opportunity through creation of additional jobs and possibly even through the creation of training opportunities. The main focus of the policy is one of employment development in existing settlements however, employment development in rural areas is addressed and therefore well being and opportunity are considered across the JCS area. As a result the policy is expected to support this SA Objective.	+	None.
13	SUSTAINABLE COMMUNITIES:	The policy seeks to support development which will hopefully provide new job opportunities for all in the JCS area. If people are employed it is likely that crime will be	+	None.

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	SAFETY Reduce crime and the fear of crime	reduced and therefore the policy supports this SA Objective.		
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The provision of jobs can improve mental health and wellbeing through creating a sense of achievement and self worth. Most employment places offer extra health care schemes and pension plans which will have positive long-term effects on employed people's health in the short and the long-term.	+	None.
15	HOUSING	Increasing access opportunities to employment opportunities may help improve ability to access a wider range of housing. However, there are unlikely to be any significant effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Employment development can have a negative effect on Green Space. However, mitigation is provided by a number of other Policies including C 6, C 5 and S 10 and therefore the effects are anticipated to be neutral.	○	None.
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The supporting of development for employment uses can also have positive effects on education and skills in a number of ways. Firstly, existing skills can be maintained and enhanced through carrying out jobs; new employers can offer work-based apprenticeships; and some employers may pay for higher education. As a result it is likely that this policy will lead to minor medium and long-term effects on this SA Objective.	+	None.

18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The policy is supportive of all types of employment including jobs provided in the culture and tourism sector and therefore supports this SA Objective.	+	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy is supportive of many of the SA Objectives with no negative effects being identified. The policy was found to be supportive of 11 SA Objectives including: Climate change; Flooding; Natural Environment; Sustainable Transport; City and Town Centres; Equality; Safety; Health and Culture and Tourism. In particular and not surprisingly, it was considered likely to have a significant positive effect on the Economy given the main thrust of the policy is to encourage development that will lead to further employment opportunities. Positive synergistic effects were found likely with regard to Economy and City and Town Centres when the policy is combined with Policy E 2.				

Policy E 2 – Ensuring the Vitality and Viability of Centres

A. The area's centres as defined below will be supported and strengthened to ensure that they continue to be the focus of communities. Initiatives which safeguard and enhance their role and function will be supported. The hierarchy of centres in the JCS area is:

Town/City Centres

Cheltenham and Gloucester

Market Towns and Rural Service Centres serving their rural hinterland:

Tewkesbury, Winchcombe and Bishops Cleeve

The exact town centre boundaries and primary and secondary shopping frontages to be protected will be defined in District Plans. The aim in defining boundaries and frontages will be to retain the predominance of town centre uses in general and retail uses in particular.

B. Over the Plan period to 2031 provision will be made for the following floor space requirements in the existing designated centres: Convenience goods floor space capacity (net)		Comparison goods floor space capacity (net)
Gloucester City	3,541	103,080
Cheltenham Borough	0	112,339
Tewkesbury Borough	1,742	7,248

C. The following **key principles** will be drawn upon in the determination of relevant planning applications:

1. New residential, retail, leisure, culture, tourism and office development that contributes to the vitality and viability of designated centres will be promoted and supported.
2. City/town centre development will be of a scale that is appropriate to its role and function as set out above and will not compromise the health of other centres or sustainable development principles.

3. Proposals for retail and other main town centre uses that are not located in a designated centre or are not in accordance with a policy in either the Joint Core Strategy or District Plans will be robustly assessed against the requirements of the sequential test and impact test, as set out in national planning guidance. 4. The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities through strategic allocations will be permitted.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.	☒	None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	☒	None.
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	☒	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	☒	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There are unlikely to be any significant environmental effects.	☒	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	☒	None.

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7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The focus of the policy on town centres and town centres uses rather than all aspects of the economy. The policy sets out estimated retail floorspace capacities for each Local Planning Authority to allocate land to meet over the plan period. The capacity provides certainty to encourage economic growth through retail over the plan period and also allows flexibility for each Local Planning Authority to choose appropriate land for retail development to be allocated. This is likely to lead to further employment opportunities over the plan period. In addition, the policy supports other types of development such as office, culture and tourism and could lead to inward investment and the growth of businesses. This will lead to minor long-term positive effects for the Economy. Positive synergistic effects are likely when combined with Policy E 1.	+	None.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The policy seeks to positively promote and support certain types of uses that contribute to the vitality and viability of designated centres. The development of city and town centres has been defined over the plan period through use of the floor space requirements in designated centres. In addition, key principle 3 requires the robust application of both the sequential test and impact test for new developments on the edge of towns to protect the vitality and viability of existing centres. As a result it is likely that this policy will lead to major positive effects of	++	Consideration should also be given to mentioning community uses as development which contributes to the vitality and viability of centres. This could lead to direct positive effects on the SA Objectives of Sustainable Communities and Health. It is recommended that an emphasis to promote competitiveness of the centres is inserted. As part of this, individuality as well as providing choice and diversity of uses is important in creating a viable centre. Inserting

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		this SA Objective in the long-term. It is expected that overall this policy in conjunction with Policies S 3 and S 4 will lead to major positive synergistic effects on this SA Objective. Positive synergistic effects are also likely when combined with Policy E 1.		these requirements will strengthen the policy and increase the certainty of the major positive effects.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH	There are unlikely to be any significant environmental effects.	○	None.
15	HOUSING	The policy supports new residential development that will contribute to the vitality and viability of designated centres. This could lead to minor positive effects on housing.	+	None.
16	GREEN SPACE	There are unlikely to be any significant environmental effects.	○	None.
17	EDUCATION AND SKILLS	The policy seeks to positively promote office development as long as it contributes to the vitality and viability of designated centres. This could lead to opportunities being created for training and maintaining existing skills leading to minor positive effects in the long-term.	+	None.
18	CULTURE AND TOURISM	The policy seeks to positively promote and support tourism development as long as it contributes to the	+	Please see recommendation 2 under SA Objective 11. If changes are made this could

Protect and enhance cultural heritage and promote tourism	vitality and viability of designated centres.		lead to a residual major positive effect on Culture and tourism.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy is likely to have significant positive effects on the SA Objective of City and Town Centres. It is also considered to support other SA Objectives including: the Economy; Education and Skills; Housing; and Culture and Tourism. Positive synergistic effects have been identified when combined with other JCS Policies including: E 1; S 3; and S 4. No negative environmental effects have been identified. Recommendations: To improve the certainty of and strengthen the positive effects identified as well as to create additional positive effects: ■ Consideration should be given to mentioning residential, cultural and community uses as development which contributes to the vitality and viability of centres. This could lead to direct positive effects on the SA Objectives of Housing; Sustainable Communities; Health; and Culture. ■ Insert an emphasis to promote competitiveness of the centres is. As part of this, individuality as well as providing choice and diversity of uses is important in creating a viable centre.			

Ambition 2 – A Sustainable Natural and Built Environment

CORE POLICY S 1 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT Planning applications that accord with this Core Strategy (and with subsequent District Plans or Neighbourhood Plans) will be approved, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, and unless: I. any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole, or II. specific policies in that Framework indicate that development should be restricted.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
2	CLIMATE CHANGE MITIGATION	The policy is likely to lead to minor positive effects on this SA Objective.	+	None. None.
3	CLIMATE CHANGE ADAPTATION	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
4	FLOODING	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.

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5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
7	HISTORIC ENVIRONMENT	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
8	SUSTAINABLE TRANSPORT	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
9	WASTE AND POLLUTION	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
10	THE ECONOMY	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
11	CITY AND TOWN CENTRES	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
14	HEALTH	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
15	HOUSING	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
16	GREEN SPACE	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.

17	EDUCATION AND SKILLS	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
18	CULTURE AND TOURISM	The policy is likely to lead to minor positive effects on this SA Objective.	+	None.
Summary of Key Negative & Positive Effects for Sustainable Development: This is a standard policy which supports the intention for sustainable development as set out in the National Planning Policy Framework 2012 and as a result it is likely to have a minor positive effect on all SA Objectives. The possibilities for enhancing the positive effects are dependent upon the other strategic policies that address specific issues for the GCT area.				

POLICY S 2 - FLOOD RISK MANAGEMENT

New development must not increase the risk of flooding either on a site or cumulatively elsewhere.

The JCS authorities will support development proposals that avoid areas at risk of flooding, in accordance with a risk based sequential approach, which does not increase the level of risk to occupiers of a site, the local community and the wider environment either on the site or elsewhere cumulatively with other development.

Minimising the risk of flooding and providing resilience to flooding, taking into account climate change, will be achieved by:

- Requiring new development to, where possible, contribute to a reduction in existing flood risk.
- Requiring new development that could cause or exacerbate flooding to be subject to a flood risk assessment which conforms to national policy and incorporates the information and guidance contained in the Authorities' Strategic Flood Risk Assessments and Supplementary Planning Documents, in order to demonstrate it will be safe, without increasing flood risk elsewhere.
- Applying a sequential test for assessment of applications for development giving priority to land in flood zone 1, and, if necessary an exceptions test to demonstrate that wider sustainability criteria outweigh any adverse impacts.
- Requiring new development to incorporate Sustainable Drainage Systems (SuDS) where appropriate to manage surface water drainage: to avoid any increase in discharge into the public sewer system; to ensure that flood risk is not increased on-site or elsewhere; and to protect the quality of the receiving water course. Where possible, the Authorities will promote the retrofitting of SuDS and encourage development to reduce the overall flood risk through the design and layout of schemes which enhance natural forms of drainage. Developers will be required to fully fund such mitigation measures including adequate provision for on-going maintenance through dedicated commuted sums, S.106 contributions or CIL for the expected lifetime of the development.
- Working with key partners, including the Environment Agency and the Lead Local Flood Authority, to ensure that any risk of flooding from development proposals is appropriately mitigated and the natural environment is protected in all new development.

Assessment of Effects			
Sustainability Objective	Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making

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1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	This policy is likely to have major positive effects on biodiversity as it will also provide protection for habitats and species in the JCS area against a potential increased risk of flooding from new development and a potential reduction in existing flood risk. Furthermore, the use of SuDs can also provide additional habitats for flora and fauna and therefore increase biodiversity in an area. SuDs can also help reduce pollution which could have negative effects on biodiversity. There are likely to be positive synergistic effects when combined with Policy S 9 and Policy S 10.	++	None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	The Policy fully supports this SA Objective and specifically requires that climate change is taken into account when minimising and proving resilience to flooding. This is likely to lead to major positive effects on this SA Objective.	++	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	The Policy fully supports this A Objective and it is likely to lead to major positive effects in the long-term on Flooding. It also goes further to ensure that cumulative effects with regard to flooding with other development are considered and addressed.	++	None.
5	NATURAL ENVIRONMENT AND RESOURCES:	The policy supports this Objective as the requirement for incorporating SuDs into development schemes will help protect and improve water quality. However the main	?	Consideration should be given to making the policy more robust to include more elements of the water environment rather than just

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	QUALITY Protect and improve the quality of natural resources including soil, water and landscape	thrust of the policy is on flood risk and many other aspects of the water environment are not considered and therefore the effects are uncertain.		flooding. It would be recommended that greater protection should be given to groundwater quality (groundwater protection zones, groundwater drinking protected areas) and surface water quality (surface drinking water protected areas) from development. Also development, in particular large scale development should contribute to meeting with the objectives of the EU Water Framework Directive in line with the Severn River Basin Management Plan.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects. Policy S 3 sets requirements for development to achieve high BREEAM and Code for Sustainable Homes standards/ levels which demand resource efficiency.	○	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	This policy is likely to have minor positive effects on historic environment as it will also provide protection for heritage assets in the JCS area against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	This policy is likely to have minor positive effects on accessibility as it will also provide protection for road infrastructure in the JCS area against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.

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9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The policy supports this Objective as the requirement for incorporating SuDs into development schemes will help reduce water and ground pollution. This is likely to lead to minor positive effects on this SA Objective.	+	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	This policy is likely to have minor positive effects on the economy as it will also provide protection economic development in the JCS area against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	This policy is likely to have minor positive effects on centres as it will also provide protection for centres in the JCS area against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.

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13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	This policy is likely to have minor positive effects on safety as it will also provide protection for people in the JCS area against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	This policy is likely to have minor positive effects on health as it will also provide protection for people and healthcare facilities in the JCS area against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	This policy is likely to have minor positive effects on housing as it will also provide protection against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	This policy is likely to have minor positive effects on green space as it will also provide protection against a potential increased risk of flooding from new development and a potential reduction in existing flood risk.	+	None.
17	EDUCATION AND SKILLS	This policy is likely to have minor positive effects on education as it will also provide protection for education facilities against a potential increased risk of	+	None.

	Improve access to education and life-long learning and enhance skills	flooding from new development and a potential reduction is existing flood risk.		
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	This policy is likely to have minor positive effects on culture and tourism as it will also provide protection for culture and tourism assets against a potential increased risk of flooding from new development and a potential reduction is existing flood risk.	+	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The policy is supportive of many of the SA Objectives with no negative effects identified. The policy was found to be supportive of 12 SA Objectives including: Historic Environment; Waste and Pollution; Economy; Housing; Green Space; Education; Sustainable Transport; City and Town Centres; Safety; Health and Culture and Tourism. In particular, the Policy was considered likely to have major positive effects on Biodiversity, Climate Change Adaptation and Flooding given its main focus on reducing flood risk and the use of SuDs. Positive synergistic effects were found likely with regard to Biodiversity when the policy is combined with Policy S 9 and Policy S 10, particularly in the mid-longer term.

Uncertain effects were identified for Natural Environment and Resources quality in particular in relation to water quality (pollution is addressed in Policy C6) and water quantity which is addressed (in part) through the BREEAM requirements in Policy S3 Sustainable Design & Construction (see following SA).

Recommendations:

- The policy should be made more sustainable by including all functions of the water environment holistically rather than just flooding since management for flood risk is integral to management for water quality, quantity and in recognition of ecosystem services (including recreational and amenity value). New development, in particular large scale strategic development, should contribute to meeting with the objectives of the EU Water Framework Directive in line with the Severn River Basin Management Plan (based on ecological status of water bodies). The policy should make explicit that water management for flood risk should not be considered in isolation from the other functions of the water environment.
- Greater protection should be given to groundwater quality (groundwater protection zones, groundwater drinking protected areas) and surface water quality (surface drinking water protected areas) from development through specific wording here in Policy S2 or in Policy C6.

CORE POLICY S 3 - SUSTAINABLE DESIGN AND CONSTRUCTION All new residential development will be required to meet the following minimum standards of construction*: •From 2013: All development - Code for Sustainable Homes Level 4 •From 2016: All development - Code for Sustainable Homes Level 5 All new non-residential development will be required to meet the following minimum standards of construction*: •From 2013: Minor development - BREEAM Very Good •From 2013: Major development - BREEAM Excellent •From 2016: All development - BREEAM Excellent Additionally, major residential led development for any of the strategic allocated sites or for residential developments of more than 250 dwellings will be required to demonstrate compliance with the following minimum standard of design*: •From 2013; All major residential development - BREEAM for Communities. Domestic refurbishments, conversions and new basements will be required to meet the following minimum standards of construction*: •From 2013: All development – BREEAM Domestic Refurbishment Excellent. Collectively, living roofs surfaced with plants or grass can make a useful contribution to the overall GI asset, especially in dense urban areas, and will be encouraged as a means of benefiting amenity, surface water runoff and wildlife value. Proposals for new development will be acceptable where, for developments of 10 or more dwellings or 1,000 m2 or more of non-residential floor space, 10% of the energy demand is secured from decentralised (on or near site) and renewable or low carbon energy sources (including the use of Combined Heat and Power where appropriate), where this would be viable. *or any future replacement and equivalent nationally recognised standards				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to	+	? To improve the certainty of positive effects of many other SA Objectives including

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	Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	lead to minor positive effects on Biodiversity. However, there are no minimum standards for this category and developers can choose whether or not to gain credits for this particular category and therefore there is an element of uncertainty with regard to whether positive effects will be realized. The use of green roofs are also encouraged which will have positive effects of flora and fauna by creating new habitats for species to live.		Biodiversity, particularly in the short term during construction, it would be recommended that a requirement for all major development to be accompanied by an environmental management plan (EMP) should be inserted. Careful consideration will need to be given when deciding on a definition for major development as this could affect the certainty of the positive effects identified.
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Climate Change Mitigation as BREEAM and code for Sustainable Homes set minimum standards for CO₂/ energy. Green roofs are encouraged and these are considered to have a high thermal mass and so can provide good insulation thereby reducing heating and cooling costs and therefore carbon emissions. This is expected to lead to minor positive effects in the long-term.	+	Please see recommendation above regarding implementation of an EMP which will help improve the certainty of positive effects on Climate Change Mitigation. Consideration should be given to increasing the percentage of the energy demand to be obtained from low carbon or renewable sources (greater than 10%) or to change the wording to require 'at least 10%' of the energy demand to be obtained from low carbon or renewable sources. Larger scale development offers greater possibilities for delivering reduced carbon emissions and increased energy efficiencies. The 10% figure is featured in both BREEAM and Code for Sustainable Homes as a minimum to get points for the energy/ CO₂ category. Under the Planning and Energy Act 2008, LPAs may impose reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources and/ or low carbon in the locality of the development. In addition, it is recommended that wording is inserted to require development to comply with energy efficiency standards that exceed the energy

				requirements of building regulations. Increasing the percentage may lead to major positive effects on Climate Change Mitigation.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Climate Change adaptation as BREEAM and code for Sustainable Homes set minimum standards for CO₂/ energy and water efficiency. Again, the encouragement of the use of green roofs can help development adapt to climate change. The high thermal mass can help structures cope with extremes of temperature. They can also help reduce the risk of flooding (please see SA Objective on Flooding for more detail).	+	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Climate Change Mitigation as BREEAM and code for Sustainable Homes set minimum standards for surface water run-off/ management. The encouragement of incorporating green roofs will also help maintain pre-development run-off volumes and rates from development sites. There are likely to be positive synergistic effects when combined with Policies S 2 and S 10.	+	None.

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5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Natural environment and Resource Quality, BREEAM and code for Sustainable Homes set minimum standards for water. However, there are no minimum standards for other resources and developers can choose whether or not to gain credits for this particular category. Furthermore soil is not specifically covered under any of the categories and therefore there is an element of uncertainty with regard to whether positive effects will be realized. Water quality can also benefit from the requirement to incorporate green roofs. As a result it is expected that the policy will have major positive effects.	+ ?	Please see recommendation outlined above for Biodiversity regarding implementation of an EMP which will help achieve certainty of positive effects on landscape and soil.
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Natural environment and Resource Use as BREEAM and code for Sustainable Homes set minimum standards for water use and materials.	+	Please see recommendation outlined above for Biodiversity regarding implementation of an EMP which will help improve certainty of positive effects on Natural Environment and Resources Use.
7	HISTORIC ENVIRONMENT	The categories assessed under BREEAM and Code for Sustainable Homes do not include the Historic Environment. However, Policies S 8 and S 6 provide	○	Please see recommendation outlined above for Biodiversity regarding implementation of an EMP which will provide additional mitigation for

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	Protect and enhance the area's distinctive historic environment	protection for heritage assets and therefore the effects are considered to be neutral for this Policy.		heritage assets affected by development.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The categories assessed under BREEAM (excluding BREEAM for Communities) and Code for Sustainable Homes do not include a category which relates Sustainable Transport. BREEAM for Communities has a number of categories which relates to transport but there are no minimum standards for this category and developers can choose whether or not to gain credits for this particular category. BREEAM for Communities is also only required by the Policy for major residentially led development only. Given the element of uncertainty with regard to whether positive effects will be realized and that the standard only applies to certain development, the effects on this SA Objective are considered to be uncertain. However, Policies D 3, D 1 and C 7 provide creation and enhancement of the transport infrastructure.	?	Please see recommendation outlined above for Biodiversity regarding implementation of an EMP which will help mitigate any negative effects for transport, particularly during the construction phase.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Climate Change Mitigation as BREEAM and code for Sustainable Homes set minimum standards for site waste management and household waste storage. However, there are no minimum standards for this pollution and developers can choose whether or not to gain credits for this particular category and therefore there is an element of uncertainty with regard to whether positive effects will be realized.	+	Please see recommendation outlined above for Biodiversity regarding implementation of an EMP which will help achieve certainty positive effects on pollution.
			?	

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10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The categories assessed under BREEAM (excluding BREEAM for Communities) do not include the Economy. However, the purpose of the policy seeks to create buildings which are sustainable and employment buildings which are sustainable are likely to have lower running costs, provide a better environment to work in and encourage inward investment to help businesses grow. In addition, BREEAM for Communities allows for credits to be awarded with regard to economic impact and labour and skills. Therefore the Policy is considered to be supportive of this SA Objective leading to minor positive effects.	+	None.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The categories assessed under BREEAM (excluding BREEAM for Communities) and Code for Sustainable Homes do not include one which relates to city and town centres. However, the purpose of the policy seeks to create buildings which are sustainable and are of high quality. This can improve the aesthetic beauty of a centre which may encourage more people to visit and use the service/ facilities. In addition, BREEAM for Communities allows for credits to be awarded with regard to the public realm. Therefore the Policy is considered to be supportive of this SA Objective leading to minor positive effects.	+	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	Again, the categories assessed under BREEAM and Code for Sustainable Homes do not include one which relates to equality although there is a category which relates to wellbeing. However, the purpose of the policy seeks to create buildings which are sustainable and are of high quality. This can help people feel more positive about the area they live in Therefore the Policy is considered to be supportive of this SA Objective	+	None.

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		leading to minor positive effects.		
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Safety. However, there are no minimum standards for this category and developers can choose whether or not to gain credits for this particular category and therefore there is an element of uncertainty with regard to whether positive effects will be realized.	+	? Please see recommendation outlined above for Biodiversity regarding implementation of an EMP which will help achieve certainty of positive effects on Safety.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The requirement for level 4/ 5 for Code for Sustainable Homes and BREEAM Very good/ Excellent is likely to lead to minor positive effects on Health. However, there are no minimum standards for this category and developers can choose whether or not to gain credits for this particular category and therefore there is an element of uncertainty with regard to whether positive effects will be realized.	+	? Please see recommendation outlined above for Biodiversity regarding implementation of an EMP which will help achieve certainty of positive effects on Health.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	Code for Sustainable Homes was created specifically to provide sustainable homes and the requirement to meet the higher levels will provide good quality, healthy and environmentally friendly places for people to live. Therefore it supports this SA Objective. There are likely to be positive synergistic effects with Policies C 1 – 3.	+	None.
16	GREEN SPACE	The categories assessed under BREEAM (excluding BREEAM for Communities) and Code for Sustainable Homes do not include a category which relates Sustainable Transport. BREEAM for Communities has a category which relates to green infrastructure although there are no minimum standards for this category and developers can choose whether or not to gain credits	?	None.

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		for this particular category. BREEAM for Communities is also only required by the Policy for major residentially led development only. Given the element of uncertainty with regard to whether positive effects will be realized and that the standard only applies to certain development, the effects on this SA Objective are considered to be uncertain.		
17	EDUCATION AND SKILLS	The categories assessed under BREEAM (excluding BREEAM for Communities) and Code for Sustainable Homes do not include a category which relates Education and Skills. However, BREEAM for Communities has a few categories which relate to labour and skills and delivery of services facilities and amenities although there are no minimum standards for this category and developers can choose whether or not to gain credits for this particular category. BREEAM for Communities is also only required by the Policy for major residentially led development only. Given the element of uncertainty with regard to whether positive effects will be realized and that the standard only applies to certain development, the effects on this SA Objective are considered to be uncertain.	?	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The categories assessed under BREEAM and Code for Sustainable Homes does not include a category which relates to culture and tourism. However, the purpose of the policy seeks to create buildings which are sustainable and are of high quality. This can improve the aesthetic beauty of a centre which may encourage more people to visit and use the service/ facilities. Therefore the Policy is considered to be supportive of this SA Objective leading to minor positive effects.	+	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The policy is supportive of many of the SA Objectives with no negative effects identified. The policy was found to be supportive of 14 SA Objectives leading to minor positive effects. Positive synergistic effects were found likely with regard to Housing and Flooding when the policy is combined with Policies C 1 – 3, S 2 and S 10.

A recommendation was put forward for Climate Change Mitigation which may lead to major positive effects on this SA Objective if implemented and at the very least improve the certainty of the positive effects. It was suggested that consideration should be given to increasing the percentage of the energy demand to be obtained from low carbon or renewable sources (greater than 10%) or to change the wording to require 'at least 10%' of the energy demand to be obtained from low carbon or renewable sources. Larger scale development offers greater possibilities for delivering reduced carbon emissions and increased energy efficiencies. The 10% figure is featured in both BREEAM and Code for Sustainable Homes as a minimum to get points for the energy/ CO₂ category. Under the Planning and Energy Act 2008, LPAs may impose reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources and/ or low carbon in the locality of the development. It is suggested that consideration is given to require development to comply with energy efficiency standards that exceed the energy requirements of building regulations in order to improve energy sustainability.

Uncertain effects have also been identified with regard to a number of SA Objectives as a result of how the standards and levels of both BREEAM and Code for Sustainable Homes are achieved. For some environmental categories there are minimum standards which must be achieved whilst other categories are optional and therefore this reduces the certainty of positive effects.

Recommendations:

- Include a requirement for all major development to be accompanied by an environmental management plan (EMP). If implemented the EMP could help: a) improve the certainty of positive effects of many other SA Objectives including Biodiversity, Climate Change Mitigation, Natural Environment and Resources Use; b) achieve certainty of positive effects on Landscape and Soil, Safety, Health and Pollution; and c) mitigate any negative effects for transport and heritage assets, particularly during the construction period.
- Provide a definition for major development as this could affect the certainty of the positive effects identified.

CORE POLICY S 4 - DESIGN REQUIREMENTS

Proposals for all new development will be required to clearly demonstrate how the following principles are reflected in development proposals:

A-Context, Character & Sense of Place: New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, addressing the urban structure and grain of the locality in terms of street pattern, layout, mass, and form and ensuring that new development is of a scale, type, density and materials appropriate to the site and its setting.

B-Legibility & Identity: New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to understand and navigate through. This should be achieved through a well-structured and defined public realm, with a clear relationship between uses, buildings, routes and spaces, and through the appropriate use of vistas, landmarks and focal points.

C- Amenity & Space Standards: Development should ensure convenience, levels of comfort and enjoyment.

D-Public Realm & Landscape: New development should ensure that the design of landscaped areas, open space and public realm are of high quality, provide a clear structure and constitute an integral and cohesive element within the design.

E-Safety & Security: New development should be designed to contribute to safe communities and where possible reduce the likelihood and fear of crime.

F-Inclusiveness & Adaptability: New development should provide for access for all potential users to buildings, spaces and the public transport network to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing requirements.

G-Movement & Connectivity: New development should be designed to prioritise movement by sustainable transport modes through the application of legible connections to the wider movement network and application of the hierarchy of transport modes set out in Table S4 below to reduce the need to travel by private car. They should:

- Be well integrated with the movement network within and beyond the development itself.
- Provide safe and legible connections to the existing walking, cycling networks.
- Ensure easy accessibility by pedestrian/cycle to local services.
- Provide and/or link into green infrastructure.
- Be consistent with guidance provided in the Manual for Gloucestershire Streets and other relevant guidance documents in force at

the time.										
<table><tr><th colspan="2">Table S4 Hierarchy of Transport Modes</th></tr><tr><td>Highest</td><td>1. Pedestrians and people with mobility difficulties 2. Cyclists 3. Public Transport and social/ community services 4. Access by commercial vehicles 5. Ultra-low emission vehicles</td></tr><tr><td>Lowest</td><td>6. Other motorised vehicles</td></tr></table>					Table S4 Hierarchy of Transport Modes		Highest	1. Pedestrians and people with mobility difficulties 2. Cyclists 3. Public Transport and social/ community services 4. Access by commercial vehicles 5. Ultra-low emission vehicles	Lowest	6. Other motorised vehicles
Table S4 Hierarchy of Transport Modes										
Highest	1. Pedestrians and people with mobility difficulties 2. Cyclists 3. Public Transport and social/ community services 4. Access by commercial vehicles 5. Ultra-low emission vehicles									
Lowest	6. Other motorised vehicles									

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2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects. Design requirements for this are considered under other policies including S 3.	○	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	It is considered that adaptability with reference to climate change is considered implicitly under key Design Principle F with the requirement that new development should be designed to be adaptable to changing requirements and therefore it supports this SA Objective.	+	Consideration should be given to clarifying what is meant by 'changing requirements' perhaps inserting the wording changing economic, social and environmental requirements. This would help increase the certainty of positive effects.
4	FLOODING	There are unlikely to be any significant environmental effects. Design requirements for this are considered under other policies including S 3 and S 4.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	Landscape is included as one of the key principles of design. It is considered that this will improve the quality of the landscape as part of the development and therefore lead to minor positive effects in the long-term. Positive synergistic effects when combined with Policy S 6. Other aspects of this SA Objective such as water and the other natural resources are covered by other policies including S3.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects. Design requirements for this are considered under other policies including S 3.	○	None.

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7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	Historic Environment is considered to be an implicit part of the key urban design principle 'Context, Character and sense of Place' which includes the requirement that the development should respond positively and respect the character of the site and its surroundings. This will lead to minor positive effects on this SA Objective in the long-term. Positive synergistic effects when combined with Policy S 8.	+	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	Many aspects of the policy support the SA Objective of Sustainable Transport. Elements under 'Movement and Connectivity,' and 'Inclusiveness' will lead to major positive effects in the long-term. Positive synergistic effects when combined with Policy C 7, D 3 and D 1.	++	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects. Design requirements for this are considered under other policies including S 3 and C 6.	○	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of	The main thrust of the policy is to produce well designed development which is fit for purpose. This supports the SA Objectives through providing development which is expected to meet the needs of existing and new businesses.	+	None.

	existing businesses			
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The policy seeks to enhance the quality of the public realm which supports this SA Objective. It is expected that overall this policy in conjunction with Policy E 2 will lead to minor positive synergistic effects on this SA Objective.	+	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The policy aims to ensure that development is well designed which will help people feel positive about the area they live and work in and includes a specific design principle on inclusiveness to reduce inequalities in opportunity. As a result it is envisaged that his policy will lead to major positive effects on this SA Objective.	++	None.
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	Safety and Security is considered as one of the key design principles and therefore supports this SA Objective. It is considered to have major positive effect on this SA Objective in the long-term.	++	None.

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14	HEALTH Improve access to health facilities and promote healthy lifestyles	The Policy will have direct impacts on Health through implementation of design principle Amenity & Space Standards and requires that development should ensure convenience, levels of comfort and enjoyment.	+	None.
		The policy will have indirect positive effects on health as good design leading to high quality housing and other development is known to have a positive impact on the health of residents/ users. The urban design principle, 'Movement and Connectivity,' will also have indirect effects through possible encouragement of walking and also through providing greater accessibility to, for example, health services. There are likely to be positive synergistic effects combined with Policies C 5 and C 6.		
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The policy will ensure that where development involves the creation of new homes, the quality of those homes will be high and this is considered to have minor positive effects on housing.	+	None.
		There are likely to be synergistic effects when combined with Policies C 1 – 3 and S 3.		
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The policy is likely to lead to direct minor positive effects on Green Space as it ensures that open space is considered (quality and/or quantity) under two design principles.	++	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.

18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The seven principle of design are all conducive to creating high quality places which will potentially attract tourists. The effects are considered to be indirect and positive.	+	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy is likely to have significant positive effects on the SA Objectives of: Green Space; Safety; Equality and Sustainable Transport as the policy focuses on the social aspects of design rather than economic and environmental. The Policy is also support of 9 other SA Objectives including: Culture and Tourism; Housing; Health; City and Town Centres; Economy; Historic Environment; Natural Environment and Resources Quality; Climate Change Adaptation; and Biodiversity. In addition, a number of positive synergistic effects have been identified for Housing, Health, Sustainable Transport, Historic Environment and Natural Environment and Resources Quality when the Policy is combined with other JCS Policies. No negative environmental effects have been identified. Recommendations: ■ Consideration should be given to clarifying what is meant by 'changing requirements' to help increase the certainty of positive effects on Climate Change Adaptation.				

POLICY S 5 - GREEN BELT

To ensure the Green Belt continues to serve its key functions, it will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF unless very special circumstances can be demonstrated.

The boundaries of the reviewed Green Belt are identified on the Green Belt map.

Areas of safeguarded land are reserved for potential future development as shown on the Green Belt map. These areas will be protected from inappropriate development until required for development purposes to meet future needs. Any release of these sites will be triggered by monitoring and a review of the JCS.

Gloucestershire Airport and Cheltenham Racecourse are designated as developed sites within the Green Belt. The current uses of these sites are generally acceptable within a green belt where the location can be determined as essential to their use.

Gloucestershire Airport

At Gloucestershire airport is defined, as shown on the Inset Map 1.

In the functional area of the airport, new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location.

Elsewhere within the airport, outside the functional area, business uses which support the airport will be permitted.

Cheltenham Racecourse

At Cheltenham Racecourse as shown on the Inset Map 2, development, including extensions, will only be permitted where:

- The development is principally related to the business of the racecourse.
- The development does not extend beyond the confines of the racecourse built up area (as shown on Inset Map 2).

Shurdington

Amendments have been to the Green Belt boundary at Shurdington, which is inset within the Green Belt.

Safeguarded Areas

An area of land West of Cheltenham, as shown on Inset Map 3, will be safeguarded for longer term development needs. A large area of this safeguarded land is also designated as a Development Exclusion Zone, where development which is likely to be significantly affected by odours will not be permitted. An area of land at North West Cheltenham, as shown on Strategic Allocation Plan 5, will be safeguarded for longer term development needs. Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land will only be granted following a local plan review which proposes the development. If any part of either safeguarded area is to be released by any means: • In preference to other schemes, in order to ensure sustainable development, development of should occur as part of an urban extension of strategic scale directly and substantially linked through existing development. • Development will be permitted where it is well integrated with existing development, well related to public transport and other existing and planned infrastructure and where it makes a positive contribution to the setting of Cheltenham. • Development which would lead to a piecemeal, isolated or inefficient use of land in this area will not be permitted. • Development which is likely to be significantly affected by noise or odours will not be permitted.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and	The policy is likely to have indirect positive effects on biodiversity by restricting development in the Green Belt. The Green Belt in the JCS area contains a number	+	None.

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	enhance biodiversity and improve connectivity between green spaces and functional habitats	of Priority habitats including: Deciduous woodland; Coastal and floodplain grazing marsh; Wood pasture and parkland; and Low land Meadows. The Green Belt also includes two SSSIs: Badgeworth and Innsworth. The protection of the Green Belt offered by this policy is likely to protect these habitats and green infrastructure which may provide linkages between them. The loss of Green Belt only constitutes a very small part of the main Green Belt and there is mitigation available in the form of S 9. Therefore the minor negative effects are not expected to outweigh the positive effects identified for the policy as a whole.		
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES:	The Policy is likely to lead to minor positive effects on the whole on this SA Objective mainly for landscape reasons as the main purposes of the Green Belt is to	+	None.

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	QUALITY Protect and improve the quality of natural resources including soil, water and landscape	check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; and to assist in safeguarding the countryside from encroachment. The loss of Green Belt only constitutes a very small part of the main Green Belt and the landscape sensitivity of the parcels of land which have been removed has been identified as being low or medium to low⁴. Therefore the minor negative effects on all topics considered under this SA Objective are not expected to outweigh the positive effects identified for the policy as a whole.		
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The policy supports this SA Objective as one of the purposes of protecting the Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Two areas of land to near Cheltenham (West and North West) have been safeguarded in the Green Belt for future development beyond the plan period. However, if there is a need for it to be released, the policy puts in place sets a number of restrictions on the development. Further additional areas have also been removed from the Green Belt. The loss of the Green Belt land although relatively small will ultimately lead to negative effects and it is considered that the land to the West of Cheltenham and all land proposed to be removed from the Green Belt makes a significant contribution to the Green Belt.⁵ Mitigation for this area provided by other JCS Policies is therefore unlikely to reduce/ prevent all		None.

⁴ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

⁵ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

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		negative effects. Therefore, it is considered to lead to minor negative effects.		
7	HISTORIC ENVIRONMENT	Again, another purpose of the Green Belt is to preserve the setting and special character of historic towns and therefore it is likely to have minor positive effects on this SA Objective. Development of the safeguarded sites and removal of a number of parcels of land from the Green Belt is unlikely to lead to significant environmental effects.	+	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The policy identifies two major developed sites within the Green Belt as sites whose uses are considered to be generally acceptable in the Green Belt and therefore development which supports these two large employers will generally be permitted. Therefore the policy seeks to support the growth of existing businesses leading to minor positive effects on the Economy.	+	None.

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11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH	There are unlikely to be any significant environmental effects.	○	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Again, the Policy is likely to lead to minor positive effects on this SA Objective as one of the main purposes of the Green Belt is to assist in safeguarding the countryside from encroachment and therefore possibly indirectly protecting open space. Development of the safeguarded sites and removal of a number of parcels of land from the Green Belt is unlikely to lead to significant environmental effects.	+	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The Green Belt protects the countryside which is considered to be a major asset for tourism in the JCS area and is therefore likely to lead to minor positive effects on this SA Objective. Development of the safeguarded sites and removal of a number of parcels of land from the Green Belt is unlikely to lead to significant environmental effects.	+	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The policy was mostly neutral as it is supportive generally only of those SA Objectives which form part of the purposes of the Green Belt, for example, Green Space, Biodiversity and the Natural and Historic Environment. It was also found to have likely minor positive effects on the Economy and this was because the policy seeks to support the growth of two developments located in the Green Belt – Gloucester Airport and Cheltenham Racecourse.

However, it was identified that the loss of some Green Belt land by development of the Safeguarded Areas (beyond the period of the Draft JCS to 2031) will ultimately lead to negative effects as it is considered that the land to the West of Cheltenham makes a significant contribution to the Green Belt.⁶ Mitigation for this provided by other JCS Policies is therefore unlikely to reduce or prevent all negative effects leading to minor residual negative effects in the longer term.

⁶ Amec (September 2011) Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council, Joint Core Strategy, Green Belt Assessment. Online at <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>

POLICY S 6 - LANDSCAPE POLICY Development will seek to protect landscape character for its own intrinsic beauty and for its benefit to the economic, environmental and social well-being by; (i) Landscape Character and Enhancement Development will be required to have regard to the local distinctiveness and historic character of the different landscapes in the JCS area. Development will be required to demonstrate how they protect or enhance landscape character and avoid detrimental effects on patterns and features which make a significant contribution to the character, history and setting of a settlement or area. Decisions on planning proposals will take account of impacts on landscape character areas and landscape types. Measures should be incorporated into development schemes to enhance the landscape character of the locality. (ii) Visual Impacts Applications for major developments may be required to be accompanied by a Landscape and Visual Impact Assessment. Where visual impacts are predicted, new landscape planting which is appropriate to the character and setting of the site should be incorporated to reduce the impacts and enhance the existing landscape. (iii) Landscape Sensitivity Applications for development will consider the sensitivity of the landscape and townscape in which they are to be located or which they will affect. In urban areas and on the urban fringe the developer will be required to demonstrate that both landscape and townscape sensitivity has been addressed. In villages and rural areas beyond the urban fringe the developer will be required to demonstrate that landscape and townscape sensitivity have been addressed.				
		Assessment of Effects		
Sustainability Objective		Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making

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1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	Positive effects can be realised for biodiversity if the landscape character in which the policy seeks to protect and enhance includes biodiversity assets.	+	Careful consideration will need to be given when deciding on a definition for major development as this could affect the certainty of the positive effects identified.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The policy fully supports this SA Objective. It even goes further to require that every development will include an assessment of the likely visual impacts on the local landscape and townscape. There are also likely to be positive synergistic effects when combined with Policies S 4 and S 10.	++	None.

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6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	The policy seeks to protect and enhance the historic character of the JCS area. This is supportive of the Historic Environment SA Objective. In addition, there are also likely to be positive synergistic effects when combined with Policy S 8.	+	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH	Landscape and in particular views, vistas and a sense of openness contribute to human health and well being. The Policy sets out provisions that guard against visual impacts o landscape and therefore there could be indirect minor positive effects on Health.	+	None.

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15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The policy is supportive of this SA objection where green space forms part of the landscape character or protected landscape characteristics of an area. It is likely to have minor positive environmental effects.	+	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Landscape can be considered to be a cultural and tourism asset and therefore this policy is supportive of this SA Objective.	+	None.
Summary of Key Negative & Positive Effects for Sustainable Development: This policy is likely to have significant positive effects on the SA Objectives of Natural Environment and Resources Quality given that it provides a robust set of requirements to ensure that landscape character is protected and enhanced, including that new development takes account of visual impacts. The policy was also found to support the following SA Objectives of: Biodiversity; Historic environment; Health; Green Space and Culture and Tourism. In addition, some positive synergistic effects on Historic Environment and Natural Environment and Resources Quality have been identified when the policy is combined with other JCS Policies including S 4, S 8 and S 10. The Policy is unlikely to lead to any negative effects on the environment. Recommendation: ■ Provision of a definition for major development as this could affect the certainty of the positive effects identified.				

POLICY S 7 - COTSWOLDS AONB				
Development proposals in and adjacent to the AONB will be required to conserve and enhance landscape, scenic beauty, wildlife, cultural heritage and other special qualities of the Cotswolds AONB and be consistent with the policies set out in the current Cotswolds AONB Management Plan, which forms part of the development plan.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	Many of the special qualities of the AONB refer to biodiversity assets and the policy requires that these assets are conserved and enhanced by development in or adjacent to the AONB. The policy is therefore likely to lead to minor positive effects on Biodiversity.	+	None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.

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5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The policy seeks to conserve and enhance all landscape aspects – local distinctiveness, particular landscape features including other natural resources in and adjacent to the AONB and therefore it is likely to lead to minor positive effects in the long-term on this SA Objective.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	+	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	Many of the special qualities of the AONB refer to heritage assets and the policy requires that these assets are conserved and enhanced by development in or adjacent to the AONB. The policy is therefore likely to lead to minor positive effects on Historic Environment.	+	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.

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12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH	There are unlikely to be any significant environmental effects.	○	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	One of the special qualities of the ANOB is that it is an accessible landscape for quiet recreation (open space) and the policy requires that this should be conserved and enhanced by development in or adjacent to the AONB. The policy is therefore likely to lead to minor positive effects on Green Space.	+	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The AONB can be considered as a cultural and tourism asset and the policy seeks to conserve and enhance these assets. Therefore the policy is considered to be supportive of this SA Objective.	+	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

Similar to the Policy on the Green Belt, it was found that the policy was generally supportive of those SA Objectives which form part of the special qualities of the AONB, for example, Green Space, Biodiversity and the Natural and Historic Environment. On the whole the policy is likely to have minor positive effects with no negative effects identified. Neutral effects were identified for all other SA Objectives.

POLICY S 8 - BUILT AND HISTORIC ENVIRONMENT The district's designated historic heritage assets, both above and below ground such as: • nationally and locally designated assets including listed buildings, registered parks and gardens, registered battlefields and Scheduled Ancient Monuments; • conservation areas; and • their settings will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place. Development should make a positive contribution to the built and historic environment of the JCS area, taking full account of the presence of any heritage assets and of their settings. Proposals which put heritage assets to viable use will be treated favourably. Such proposals will be required to preserve and enhance local character and valued aspects of the historic environment including individual assets (both designated and undesignated) and their setting in a manner appropriate to their significance. When considering proposals, consideration will be given to the contribution made to supporting sustainable communities, enhancing economic vitality, addressing local character and distinctiveness; and improving accessibility where appropriate.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.	○	None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE	There are unlikely to be any significant environmental effects.	○	Consideration could be given to inserting a requirement to ensure that where heritage

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	ADAPTATION Adapt to the consequences of climate change			assets are to be redeveloped, they are to be made adaptable to the consequences of climate change. This could lead to minor positive effects.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The policy seeks to conserve and enhance the historic environment as part of local distinctiveness, character and landscape. As a result it is likely to support this SA Objective. There are also likely to be positive synergistic effects on this SA Objective when combined with Policy S 6.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	The policy fully supports this Objective by conserving and enhancing the historic environment. It supports putting heritage assets to viable use with particular requirement to ensure protection. It also goes further to require that all new development should make a positive contribution to the built and historic environment. As a result it is likely to lead to major long-term positive effects on the historic environment. There are also likely to be positive synergistic effects when combined with Policy S 6.	++	None.

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8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	Consideration is given in the policy to improving accessibility where appropriate which is supportive of this SA Objectives. Therefore it is considered to lead to minor positive effects.	+	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The policy includes a requirement to consider the proposal contributions to enhancing economic vitality. This is supportive of this SA Objective and therefore is considered to have minor positive effects.	+	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES:	There are unlikely to be any significant environmental effects.	○	None.

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	SAFETY			
14	HEALTH	There are unlikely to be any significant environmental effects.	○	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE	Historic parks and gardens which usually provide accessible green space will benefit from this policy leading to minor positive effects in the long-term on Green Space.	+	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Heritage assets can also be considered to be cultural and tourism assets. Therefore the policy is also supportive of this SA Objectives and will lead to minor positive effects.	+	Consideration should be given to inserting Cultural assets into the Policy as this will strengthen the policy and increase the certainty of the positive effects.

Summary of Key Negative & Positive Effects for Sustainable Development:

This policy is likely to have major positive effects on the SA Objective of Historic Environment as it provides a robust set of requirements to protect and enhance the heritage assets. The way the policy is worded also lends it to support the following SA Objectives: The Economy; Sustainable Transport; Green Space; and Culture and Tourism; positive synergistic effects were identified when the policy is combined with Policy S 6. No negative effects on the environment have been identified.

Recommendations:

- Consideration should be given to inserting a requirement to ensure that where heritage assets are to be redeveloped, they are to be made adaptable to the consequences of climate change and thus likely to lead to minor positive effects on the SA Objective of Climate Change Adaptation.
- Secondly, with reference to Culture and Tourism, it was recommended that consideration should be given to inserting 'cultural assets' into the Policy as this will strengthen the policy and increase the certainty of the positive effects on the Culture and Tourism SA Objective.

POLICY S 9 - CONSERVATION AND IMPROVEMENT OF BIODIVERSITY AND GEODIVERSITY Development proposals will be required to support the enhancement of existing biodiversity and geodiversity assets, explore opportunities to create and manage new ones where it is appropriate, and establish and reinforce ecological networks that are resilient to current and future pressures. Proposals will be required to support: • The creation of linkages between sites to create a connected local and regional biodiversity network of wildlife corridors and green infrastructure. • Improvements to Strategic Nature Areas as set out on the Gloucestershire Nature Map or meeting other local biodiversity objectives, such as enhancements to Nature Improvement Areas. • Measures to conserve and, if possible, enhance biodiversity and geodiversity assets appropriate to their importance. Any development that has potential to have a significant impact on a European or International site will be subject to a Habitats Regulations Assessment. Within nationally designated sites, development will not be permitted unless it is necessary for appropriate on-site management measures to be carried out and it can demonstrate no adverse impacts to the integrity of these sites. Development adjacent to or within locally designated sites will not be permitted where it would have an adverse impact on the integrity of these sites, and harm to biodiversity or geodiversity cannot be mitigated. Where there is a risk of harm to biodiversity or geodiversity as a consequence of a proposed development, developers will be expected to integrate enhancements into the proposal through mitigation measures that are appropriate to the location. If harm cannot be mitigated on-site then compensatory enhancements will be required off-site.				
		Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
	Sustainability Objective			

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1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The policy seeks to safeguard, enhance and create new biodiversity/ geodiversity assets complete with the requirement for mitigate any risk of harm. It also advocates the uses of the ecosystems services approach to help determine mitigation and off-setting measures. This will lead to long-term major positive effects on biodiversity. It also seeks to create linkages between sites and incorporate Green Infrastructure.	++	A contradiction has been found between the requirements of the first paragraph and the second (4th bullet) with regard to the enhancements of biodiversity and geodiversity assets. It is recommended that the wording 'if possible' is removed from the 4 th bullet of the second paragraph of the policy to ensure the certainty of the major positive effects on Biodiversity.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	0	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	The policy wording includes the requirement for development to reinforce ecological networks that are resilient to current and future pressures. This is supportive of an element of the SA Objective of Climate Change Adaptation.	+	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	The requirement to create linkages between sites to create a connected local and regional network of wildlife corridors and green infrastructure could provide opportunities to reduce the risk of flooding. For Examples, the use of SUDs can create ponds which manage surface water run-off and reduce the risk of flooding.	+	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the	The policy seeks to safeguard, enhance and create new geodiversity assets complete with the requirement for mitigate any risk of harm. As this Policy only deals with one topic within this SA Objective it is considered that it will lead to minor positive effects in the long-term. Other topics such as soils and landscape are protected through other JCS Policies.	+	None.

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	quality of natural resources including soil, water and landscape			
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The Policy could indirectly protect Greenfield land from development if there are biodiversity/ geodiversity assets present. Therefore the Policy is likely to lead to minor positive effects in the long-term.	+	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The requirement for the conservation and possible enhancements of biodiversity assets could have indirect positive effects on waste and pollution through ecosystem services being improved. These are expected to be minor in nature.	+	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.

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12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH Improve access to health facilities and promote healthy	Improvements to biodiversity/ geodiversity assets can have positive effects on health through providing areas where people are encouraged to exercise to experience nature and this can also benefit mental health.	+	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Opportunities exist to encourage/ allow greater public access to biodiversity and geodiversity assets, however, the policy in its current state does not allow for these opportunities to be realized. This results in the policy having an uncertain effect on this SA Objective.	?	Consideration could be given to creating greater access for local people to experience their local biodiversity and geodiversity assets. This would increase positive effects on Green Space but it also could have indirect positive effects on Education and skills and Health.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	Biodiversity and geodiversity assets can also be considered to be cultural and tourism assets and any improvement, enhancement or creation of new ones, is likely to also have a positive effect on this SA Objective.	+	As mentioned for Green space, creating greater access for local people to experience their local biodiversity and geodiversity assets would also increase positive effects on Culture and Tourism.

Summary of Key Negative & Positive Effects for Sustainable Development:

The policy is likely to have significant major positive effects on the SA Objective on Biodiversity. No negative effects have been identified. Minor positive effects have been identified for Climate Change Adaptation; Flooding; Health; Natural Environment and Resources; Waste and Pollution; and Culture and Tourism. Uncertain effects have been identified for Green Space.

Recommendations:

- To improve the certainty of positive effects, consideration could be given to creating greater access for local people to experience their local biodiversity and geodiversity assets. This would also have positive effects on Education and skills, Health and Culture and Tourism. The potential conflict in uses is appreciated but this can be addressed within an overall biodiversity and ecosystems services approach (and see Green Infrastructure Policy following).
- The first paragraph "requires" support for enhancement biodiversity and geodiversity assets whilst the second paragraph qualifies this with "if possible" thus potentially reducing the certainty of the major positive effects indicated for Biodiversity – recommended that this apparent inconsistency is resolved.

POLICY S 10 - GREEN INFRASTRUCTURE				
Development will protect and enhance the green infrastructure network of the local and strategic importance which will deliver a series of multifunctional, linked green corridors across the JCS area by: • Improving the quantity and/or quality of assets. • Improving linkages between assets at local, intermediate and strategic/landscape scale in a manner appropriate to the scale of development. • Designing improvements in a way that supports their cohesive management of green infrastructure. Proposals that will have an impact on woodlands, hedges and trees should include a full justification for any loss and incorporate measures to mitigate and enhance their contribution to green infrastructure, landscape character, public amenity and biodiversity. New development should: • Enable the expansion of native woodland, wherever possible, to help climate change adaptation by buffering and extending fragmented ancient woodlands, to promote recreation and public health. • Create new footpaths, bridleways or cycling links to improve the accessibility of the Green Infrastructure network for active travel. • Explore opportunities to increase connectivity, particularly in the urban areas. On large scale developments, developers will be expected to deliver connectivity through their site and to the wider hinterland. • Link to the wider Green Infrastructure asset and ultimately to the strategic Green Infrastructure assets.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	Biodiversity and geodiversity assets (habitats) are also considered to be Green Infrastructure (GI). Many of	++	Consideration should be given to linking the policy to the GI Study to provide further

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	Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	these assets are listed specifically in the policy for protection and enhancement. This is expected to have major long-term positive effects on Biodiversity.		clarification as to what GI is and what GI assets are considered to be strategic and what ones are considered to be local. This would improve the certainty of the positive effects of this policy.
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	The protection and enhancement of GI can have positive effects on this SA Objective as GI can be used to off-set carbon emissions of development.	+	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Again, the protection and enhancement of GI can have positive effects on this SA Objective for a number of reasons. For example, GI can help manage surface water which is particularly important if storms with heavy burst of rain are going to become more frequent and also GI can provide shade in hot summers.	+	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	The protection and enhancement of GI can help reduce the risk of flooding. For example, planting new trees and woodlands will intercept more water reducing surface water run-off and incorporating green roofs will help maintain pre-development run-off volumes and rates from development sites.	+	None.

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5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The policy seeks to protect and enhance the quality of natural resources in particular landscape. Soil benefits from the protection of woodland protecting it from urban development and pollution. Water quality can also benefit from the requirement to protect GI. As a result it is expected that the policy will have major positive effects. As a result it is expected to have minor positive effects in the long-term.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	A requirement of the policy is to improve the connectivity of GI assets by creating new footpaths, bridleways or cycling links. This could encourage the use of bicycles and encourage more people to walk to their destinations leading to minor positive environmental effects. This likely to have positive synergistic effects with Policies S 4, C 7 and D 4.	+	None.
9	WASTE AND POLLUTION Minimise pollution	The requirement for the conservation and possible enhancements of GI could have indirect positive effects on waste and pollution through ecosystem services being improved. These are expected to be	+	None.

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	and waste to landfill	minor in nature.		
10	THE ECONOMY	GI can enhance the environment of the JCS area which can attract more people to live, work, be educated in and visit the area. This can boost the economy in a number of ways leading to minor positive effects.	+	None.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	GI can enhance the public realm making it an attractive place to visit. It can provide places to rest and have lunch encouraging people to support the local shops and services in the centre. GI could also improve connectivity to the centre providing pleasant and interesting walkways/ cycle ways that link the centre to other areas outside.	+	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	Incorporating GI can have several positive effects on Equality. Firstly, GI can improve the aesthetics of an area which can help people feel more positive about the area they live in. Secondly, the requirement to improve connectivity between GI can lead to improvement in accessibility between different places and therefore different goods and services. This can reduce inequality of access and also opportunity. This policy combined with Policies S 4, C 5 and C 6.	+	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH	The policy seeks to retain all existing public rights of way and requires consideration of whether new rights of way	+	None.

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	Improve access to health facilities and promote healthy	can enhance interconnected networks to encourage active lifestyles. In addition it also seeks for developers either provide or make a contribution towards public open space. As a result this is likely to lead to minor positive effects n Health. There are also likely to be positive synergistic effects when combined with Policy C 6.		
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Green Space forms a major part of GI and as a result this policy full supports this SA Objective leading to major positive effects. There are also likely to be positive synergistic effects when combined with Policy C 6.	++	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	GI assets can also be considered to be cultural and tourism assets and therefore the policy is also likely to have minor positive effects on this SA Objective.	+	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

This policy is likely to have significant major positive effects on the SA Objective of Green Space and Biodiversity; no negative effects have been identified. The policy provides clear provisions to protect and enhance green infrastructure and as a result is considered to support a number of other SA Objectives including: Natural Environment and Resources Quality; Equality; Health; Waste and Pollution; Climate Change Mitigation and Adaptation; Flooding; Sustainable Transport; Economy; City and Town Centres; and Culture and Tourism. There are likely to be positive synergetic effects on a number of SA Objectives if the policy is considered with other Core Policies S 4, C 5 and C 6.

Recommendations:

- To increase the certainty of positive effects, it is recommended that the policy is linked to the GI study to provide further clarification as to what GI is, which GI assets are considered to be strategic and which are considered to be local.

CORE POLICY S 11 - RENEWABLE ENERGY/ LOW CARBON ENERGY DEVELOPMENT				
Proposals for development for the generation of energy from renewable resources will be permitted, provided the wider environmental, social or economic benefits of the installation would not be outweighed by a significant adverse impact on the local environment taking into account the following factors: •The impact of the scheme including any associated transmission lines, buildings and access roads on landscape character, local amenity, historic features and biodiversity: •Evidence that the proposal has been designed and sited so as to minimise any adverse impacts on the surrounding area: •Any unreasonable adverse impacts on users and residents of the local area, including emissions and noise: •The benefits on the local economy, the community and achievement of national targets. •The feasibility of removing any installation and re-instatement of the site in future years.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The impact on Biodiversity is a requirement for any renewable energy/ low carbon development to take account of and therefore this policy is considered to support this SA Objective. Mitigation is also provided by Policy S 9 and therefore the effects are considered to be neutral.	○	None.
2	CLIMATE CHANGE MITIGATION	The policy is fully supportive of this SA Objective and will lead to major positive effects.	++	None.

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	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint			
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	Flooding is a key issue for the JCS area and any new development is likely to increase the risk of flooding. However, it is anticipated that any negative effects on this SA Objective will be addressed by compliance with Policy S2 and therefore the policy is considered to have neutral effects on flooding.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The impact on Landscape Character is a requirement for any renewable energy/ low carbon development to take account of and therefore this policy is considered to support this SA Objective. Mitigation for negative effects on natural resources are also provided under a number of other Core Policies including S 2, S 6 and C 6 and therefore the effects are considered to be neutral.	○	None.
6	NATURAL ENVIRONMENT AND RESOURCES:	Any negative effects on resource use are likely to be mitigated by other JCS Policies including S 3 and S 6. Therefore the effects are considered to be neutral.	○	None.

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	USE Minimise the use of natural resources including soil, water and Greenfield land through good design			
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	The impact on historic assets is a requirement for any renewable energy/ low carbon development to take account of and therefore this policy is considered to support this SA Objective. Mitigation is also provided by Policies S 6 and S 8 and therefore the effects are considered to be neutral.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	Any negative effects on sustainable transport are likely to be mitigated by a number of other JCS Policies including S 4, C 7 and D 3. Therefore the effects are considered to be neutral.	○	None.
9	WASTE AND POLLUTION	Any negative effects on Waste and Pollution are likely to be mitigated by a number of other JCS Policies	○	None.

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	Minimise pollution and waste to landfill	including S 3 and C 6. Therefore the effects are considered to be neutral.		
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The policy supports renewable energy/ low carbon energy development which is permitted is likely to lead to several economic benefits mainly through providing additional employment opportunities and contributing to the green economy.	+	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	Any negative effects on Health are likely to be mitigated by a number of other JCS Policies including S 3, and C 6. Therefore the effects are considered to be neutral.	○	None.

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15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Any negative effects on Green Space are likely to be mitigated by a number of other JCS Policies including S 4, C 6 and S 10. Therefore the effects are considered to be neutral.	○	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy is likely to have major positive effects on the SA Objective of Climate Change Mitigation as it seeks to support renewable/ low carbon energy development which will inevitably help reduce carbon emissions. The effects upon the SA Objective on Economy is likely to be minor positive as the development of this type is likely to lead to several economic benefits mainly through providing additional employment opportunities and contributing to the green economy. The effects on all other SA Objectives are considered to be neutral either because they are not affected by the Policy or because any negative effects are likely to be mitigated by other JCS Policies.				

Ambition 3 – A Healthy, Safe and Inclusive Community

POLICY C 1 – RESIDENTIAL DEVELOPMENT Proposals for housing development and conversions to dwellings will normally be permitted on previously developed land in the following areas, subject to the proposals having no serious impact upon the amenity and environment of their surroundings: The built up areas of Gloucester, Cheltenham and Tewkesbury Town. Within Rural Service Centres and Service Villages. Proposals for housing development on Greenfield land, other than in urban extensions and strategic allocations identified in the Joint Core Strategy, District Plans or Neighbourhood Plans will only be permitted where: It is for affordable housing on a rural exception site, or It is a home for a rural worker where there is a clear functional and financial need for the person to be readily available on the site at all times, or It is infill development within the existing built up areas of villages, or It is brought forward through Neighbourhood Plans or Community Right to Build Orders. Residential development should seek to maximise density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment, and the safety and convenience of the local and trunk road network.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	Any negative effects on Biodiversity are likely to be mitigated by a number of other JCS Policies including S	O	None.

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	Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	3, S 9 and S 10. Therefore the effects are considered to be neutral.		
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	Requirements for residential development to reduce their contributions to climate change are set under Policy S 3. Therefore the effects are considered to be neutral.	○	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Requirements for residential development to adapt to climate change are set under a number of JCS Policies S 2, S 3 and S 4. Therefore the effects are considered to be neutral.	○	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	Flooding is a key issue for the JCS area and any new development is likely to increase the risk of flooding. However, it is anticipated that any negative effects on this SA Objective will be addressed by compliance with Policy S2 and therefore the policy is considered to have neutral effects on flooding.	○	None.

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5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	Mitigation for negative effects on natural resources are also provided under a number of other Core Policies including S 2, S 6 and C 6 and therefore the effects are considered to be neutral.	○	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	Any negative effects on resource use are likely to be mitigated by other JCS Policies including S 3 and S 6. In addition, the Policy inserts a requirement that normally proposals for housing development will only be permitted on previously developed land and put a number of conditions on development on Greenfield land. As a result it is expected to have minor positive effects on this SA Objective.	+	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	Any negative effects on Historic Environment are likely to be mitigated by other JCS Policies S 6 and S 8. The Policy also puts in place a safeguard for heritage assets against inappropriate density of housing and therefore the effects are considered to be neutral.	○	None.

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8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	Any negative effects on sustainable transport are likely to be mitigated by a number of other JCS Policies including S 4, C 7 and D 3. In addition, the Policy also puts in place mitigation to ensure the safety and convenience of the local and trunk road network against inappropriate density of housing. The policy also encourages residential towards being in accessible locations which is supportive of this SA Objective.	+	None.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	Any negative effects on Waste and Pollution are likely to be mitigated by a number of other JCS Policies including S 3 and C 6. Therefore the effects are considered to be neutral.	○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of	Requirements for residential development to consider reducing crime and improving safety are set under Policy S 3. Safety is also considered with regard to density under the policy and therefore the policy is considered to lead minor positive on this SA Objective. Positive synergistic effects are considered likely when	+	None.

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	crime	the policy is combined with Policy S 4.		
14	HEALTH Improve access to health facilities and promote healthy lifestyles	Any negative effects on Health for example through increase pressure on existing health care services are likely to be mitigated by a number of other JCS Policies including C 5 and C 6. Therefore the effects are considered to be neutral.	○	None.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The policy supports this SA Objective as it encourages housing to be built in the most accessible locations.	+	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Any negative effects on Green Space are likely to be mitigated by a number of other JCS Policies including S 4, C 6 and S 10. Therefore the effects are considered to be neutral. However, the 4 th bullet of the second paragraph refers to allowing the infilling of development within the existing built up areas of villages. This could be in direct conflict with the requirements of two JCS Policies S 10 and S 4 For example, if the area of infill land provides open space/ GI for existing development, the policy suggests that open space or GI could be removed if there a local housing need has been identified. This could lead to negative effects.	○ -	Consider re-wording 4 th bullet of the second paragraph to remove conflict with other JCS Policies S 10 and S 4. This would result in the policy having neutral effects on Green Space.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.

18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The appraisal has found that the policy will not lead to any positive or negative significant environmental effects. The policy seeks to encourage housing development on previously developed land and puts strict requirements in place for proposals permitted on Greenfield land. It was considered to be supportive of a number of SA Objectives including: Natural Environment and Resources Use; Sustainable Transport; Safety; and Housing. A potential negative effect was identified because the 4th bullet of the second paragraph refers to allowing the infilling of development within the existing built up areas of villages, to meet local housing need. It was felt that this could be in direct conflict with the requirements of two other JCS Policies S 10 and S 4. For example, if the area of infill land provides open space/ GI for existing development, the policy suggests that open space or GI could be removed if there a local housing need has been identified. Recommendations: ■ 4th bullet is re-worded to remove the conflict which would result in the policy have neutral effects of the SA Objective of Green Space.				

POLICY C 2 – HOUSING MIX AND STANDARDS A. General Market Housing Proposals for housing will be required to contribute to the mix of housing required to provide balanced communities and meet the needs of the area, as set out in the most up to date study of housing need and/or Housing Market Assessment and shall accord with the provisions of design policy S4. B. Lifetime Homes ☐ At least 25% of homes, across all tenures, on sites of 50 or more dwellings should be built to Lifetime Home standards, and ☐ In the case of affordable housing all ground-floor properties should be designed to meet current Lifetime Homes standards C. Homes for Older People Proposals for Retirement Villages and Continuing Care Retirement Schemes will need to be accompanied by evidence that the homes/bed spaces meet the needs of the community. Requirements for the location and standards of student accommodation and houses in multiple occupation will be set out in relevant District Plans.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.	○	None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE	There are unlikely to be any significant environmental effects.	○	None.

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	ADAPTATION			
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There are unlikely to be any significant environmental effects.	○	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The policy seeks to secure a range of different types of homes which meets the needs of the population in the JCS area. This should reduce inequalities in wellbeing and opportunity as it should increase access to homes for all people in the JCS area. Therefore it fully supports this SA Objective leading to major positive effects.	++	None.

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13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH	The requirement for at least 25% of homes, across all tenures, on sites of 50 or more dwellings should be built to Lifetime Home standard, will lead to direct minor positive effects on Health.	+	None.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The policy seeks to secure a range of different types of homes which meets the needs of the population in the JCS area and therefore it fully supports this SA Objective leading to major positive effects.	++	None.
16	GREEN SPACE	There are unlikely to be any significant environmental effects.	○	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy seeks to secure a range of different types of homes which meets the needs of the population in the JCS area. This should reduce inequalities in wellbeing and opportunity as it should increase access and meet the residential requirements of all people in the JCS area and also the requirement for Lifetime Homes should have minor positive effects on Health. Therefore it is likely to lead to significant major positive effects on Equalities and Housing. No negative effects have been identified with effects on all the other SA Objectives being considered to be neutral.				

POLICY C 3 – AFFORDABLE HOUSING A percentage of affordable housing set out in the most up to date Strategic Housing Market Assessment will be sought on all sites where there is a net gain of five or more dwellings subject to the viability of provision on each site. A tenure mix of new social rented, affordable rented and shared ownership housing will be sought in accordance with the most up to date Strategic Housing Market Assessment. With the exception of part units the affordable housing should be provided on site and the affordable housing should be seamlessly integrated and distributed throughout the development scheme consisting only of small groups and being undistinguishable from market housing in terms of appearance, build quality and materials. The housing should meet required standards and should be of a size and type which meets the requirements of those in housing need as set out in the most up to date Strategic Housing Market Assessment. Developments that create new dwellings will be subject to the Affordable Housing and other policies as appropriate, regardless of the Use Class applied to the site as whole. Financial viability assessments evidence will be required that conform to an agreed methodology and, where necessary, independently appraised by the local authority at the cost of the applicant.				
		Assessment of Effects		Mitigation Possibilities, Residual Effects Recommendations for plan-making
	Sustainability Objective	Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.	○	None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE	There are unlikely to be any significant environmental	○	None.

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	CHANGE ADAPTATION	effects.		
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There are unlikely to be any significant environmental effects.	○	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The policy seeks to secure a mix of affordable homes which meets the needs of the population in the JCS area. This should reduce inequalities in wellbeing and opportunity as it should increase access to homes for all people in the JCS area. Therefore it fully supports this SA Objective leading to major positive effects.	++	
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	

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14	HEALTH	There are likely to be indirect positive effects on Health given that more people will have access to a decent home. This is likely to result in minor positive effects.	+	
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The policy seeks to secure a proportion of affordable housing on all sites where there is a net gain of 5 houses or more leading to major positive effects on Housing.	++	There is a risk that parcels of land may be divided up and developed at different times to avoid meeting the threshold. Land may also not be developed to its full potential. Consideration should be given to strengthening the wording to ensure the certainty of the major positive effects.
16	GREEN SPACE	There are unlikely to be any significant environmental effects.	○	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The policy seeks to secure a mix of affordable homes which meets the needs of the population in the JCS area. This should reduce inequalities in wellbeing and opportunity as it should increase access to homes for all people in the JCS area and also allow more people to have access to a decent home which can have indirect minor positive effects on Health. Therefore it is likely to lead to significant major positive effects on Equalities and Housing. No negative effects have been identified with effects on all the other SA Objectives being considered to be neutral.

Recommendations:

- The policy only applies to development sites where there is a net gain of 5 houses or more. As a result of this threshold, there is a risk that parcels of land may be divided up and developed at different times to avoid meeting the threshold. Land may also not be developed to its full potential. Re-wording the policy to reduce the risk should increase the certainty of the positive effects.

POLICY C 4 – GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE				
The potential for provision of new gypsy, traveller and travelling showpeople sites should be considered through urban extensions and strategic allocations. All proposals for new gypsy, traveller and travelling showpeople sites will be assessed against the following criteria; • There is a proven need for the development and the capacity of the site can be justified for further gypsy, traveller and travelling showpeople sites, or extensions to existing sites. • The development is not within an area of sensitive landscape and in all other location it will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings. • The site has safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network. • No significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable. • The site is situated in a suitable location in terms of access to local amenities, services and facilities, including schools, shops, health services, libraries and other community facilities. • The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. The site should also be large enough to enable vehicle movements, parking and servicing to take place, having regard to the number of pitches/yards on site, as well as enabling access for service and emergency vehicles, including circulation space along with residential amenity and play areas.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and	Any negative effects on Biodiversity are likely to be mitigated by a number of other JCS Policies including S 3, S 9 and S 10. Therefore the effects are considered to		None.

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	enhance biodiversity and improve connectivity between green spaces and functional habitats	be neutral.		
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Requirements for residential development to adapt to climate change are set under a number of JCS Policies S 2, S 3 and S 4. Therefore the effects are considered to be neutral.	○	None.
4	FLOODING Manage and reduce flood risk and surface water run-off	Flooding is a key issue for the JCS area and any new development is likely to increase the risk of flooding. In addition, Planning Policy for Travellers Sites (2012) requires that plan policies do not locate traveller sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans. However, the policy contains wording to ensure that potential sites are not a risk of flooding and it is anticipated that any other negative effects on this SA Objective will be addressed by compliance with Policy S2. Therefore the policy is considered to have neutral effects on flooding.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES:	Mitigation for negative effects on natural resources are also provided under a number of other Core Policies including S 2, S 6 and C 6 and therefore the effects are	○	None.

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	QUALITY Protect and improve the quality of natural resources including soil, water and landscape	considered to be neutral.		
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The policy puts safeguards in place to protect sensitive landscapes, the character and appearance of landscape and the amenity of neighbouring properties. In addition, any other negative effects on resource use are likely to be mitigated by other JCS Policies including S 3 and S 6. Therefore the effects are considered to be neutral.	○	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	Any negative effects on resource use are likely to be mitigated by other JCS Policies S 6 and S 8. Therefore the effects are considered to be neutral.	○	None.
8	SUSTAINABLE TRANSPORT	Any negative effects on sustainable transport are likely to be mitigated by a number of other JCS Policies including S 4, C 7 and D 3. In addition, the Policy also	○	None.

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	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	puts in place mitigation to ensure that chosen sites have safe and satisfactory vehicular and pedestrian access to the surrounding highway network and also local amenities, goods and services. As a result the effects are likely to be neutral.		
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	Any potential new sites must be properly serviced (water, drainage, waste) according the requirements of the Policy. In addition, any negative effects on Waste and Pollution are likely to be mitigated by a number of other JCS Policies including S 3 and C 6. Therefore the effects are considered to be neutral.	○	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The effects on this SA Objective are uncertain as it is unclear whether new pitches will be allowed to include some economic development to provide employment on site for gypsy and travelers.	?	Consideration should be given to clarifying what is meant by 'accommodation' and whether this includes economic development on potential gypsy and Traveller sites. If economic development is allowed, it is likely that the residual effects will be positive for this SA Objective.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.

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12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The Policy acknowledges the importance of identifying sites to provide for locally identified pitch/ plot requirements and sets out opportunities for Gypsy, Travellers and Traveling Showpeople accommodation as part of Strategic Allocations should be fully explored. It also sets criteria for future site searches in lower level plans as well as the assessment of speculative application that may be submitted to the Local Planning Authorities in the future. This is likely to lead to minor positive effects.	+	None.
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	Road safety has been directly considered in the Policy and other requirements for reducing crime and improving safety are set under Policy S 3. As a result it is considered to have neutral effects on this SA Objective.	○	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	Any new site is required by the Policy to be situated in a suitable location in terms of access to healthcare facilities. In addition, any negative effects on Health for example through increase pressure on existing health care services are likely to be mitigated by a number of other JCS Policies including C 5 and C 6. Therefore the effects are considered to be neutral.	○	None.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	The policy supports this SA Objective as it seeks to provide accommodation for Gypsies, Travellers and Travelling Showpeople.	+	The positive effects on this SA objective could be made more certain if new sites were required to be provided as part of the new Strategic Allocations rather than just requiring that provision should be considered.

16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Any negative effects on Green Space are likely to be mitigated by a number of other JCS Policies including S 4, C 6 and S 10. Therefore the effects are considered to be neutral.	○	None.
17	EDUCATION AND SKILLS	Any new site is required by the Policy to be situated in a suitable location in terms of access to schools. In addition, any negative effects on education for example through increase pressure on existing school capacity are likely to be mitigated by Policy C 5. Therefore the effects are considered to be neutral.	○	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	There are unlikely to be any significant environmental effects.	○	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy seeks to provide accommodation for Gypsies, Travellers and Travelling Showpeople and therefore it is supportive of the SA Objectives of Housing and Equality. The effects on the majority of other SA Objectives are considered to be neutral with the exception of the effects on Economy which at present are considered to be uncertain. Recommendations: - Positive effects on Economy could be realised if the word 'accommodation' was clarified to state whether it includes employment related development and if so this could lead to minor positive effects on the Economy. - Positive effects on the SA Objective of housing could be made more certain if new sites were required (rather than just considered) to be provided as part of the new Strategic Allocations.				

POLICY C 5 – COMMUNITY FACILITIES Existing community facilities will be safeguarded, unless it can be demonstrated to the satisfaction of the local authority that these are surplus to requirements and that their loss would not create, or exacerbate, any shortfall in supply. When demonstrating that a facility is surplus to requirements the applicant will need to illustrate that engagement has been undertaken with relevant community groups and partner organisations. Where new residential development will create, or add to, a need for community facilities, this must be fully met as newly built, on-site provision and/or a contribution to facilities or services off-site and be of an appropriate type, standard and size. Developers will be expected to engage with the relevant local authorities and, if appropriate, health and education authorities, from an early stage to ensure that new provision: •meets the needs of the community that it will serve, and •is provided prior to the first occupation of development. Developers will also be required to demonstrate that their proposals will have no adverse impact on existing communities in terms of their access to essential services. Community facilities should be centrally located to the population they serve and should be easily accessible on foot and by bike and well served by public transport. In the case of green open space easily accessible means it is located within 300m (or 5 minute walk) from the houses it serves. New facilities should be accessible to all members of the community, including children, older people and disabled people. Developers should aim to provide flexible, multi-functional facilities within mixed-use developments, creating shared space which maximises benefits to the community.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.	O	None.

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2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There are unlikely to be any significant environmental effects.	○	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The policy requires that community facilities should be accessible to all members of the community on foot, and by bike and be well served by public transport.	+	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.

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10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The policy safeguards existing community facilities and by default it is likely that the jobs associated with the running, up-keep and maintenance of the facilities will also be protected. In addition, when new residential development is proposed which creates or adds to a need for community facilities, developers are required to provide and/ or contribute towards the facilities. This could create new employment opportunities or sustain existing employment for the community. It is considered that this policy will lead to minor positive indirect effects on employment.	+	Community facilities are also important for non-residential development. For example, in particular, crèche provision and youth clubs can assist parents going to work. It is therefore recommended that the policy should be expanded to all types of development which will strengthen the policy and increase the certainty of the positive effects.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The policy requires that community facilities should be located in centres and other locations which are accessible. Community facilities can support the vitality and viability of town centres contributing to the diversity of uses and services and thus leading to minor long-term positive effects.	+	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The requirement to provide and/ or contribute towards community facilities should help ensure that inequalities in wellbeing and opportunity are reduced as where there is a lack of a particular facility, for example, sports or education facilities in an area, it is likely that this will be addressed. The Policy also requires that new facilities are accessible to all members of the community. Therefore there are likely to be major positive effects. There are likely to be positive synergistic effects	++	None.

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		combined with Policies S 4 and C 6.		
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The policy seeks to protect existing healthcare, parks, open space and sports facilities as part of community facilities. In addition, when new residential development is proposed which creates or adds to a need for health and sports facilities, developers are required to provide and/ or contribute towards those facilities. The policy also seeks to improve access to community facilities. Therefore there are likely to be major positive effects. It is expected that overall this policy in conjunction with Policy C 6 will lead to positive synergistic effects on this SA Objective.	++	
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	This policy has the potential to have a direct major positive effect on this SA Objective as community facilities include public open space.	++	None.
17	EDUCATION AND SKILLS	The policy seeks to protect existing schools and community centres as part of community facilities. In addition, when new residential development is	++	None.

	Improve access to education and life-long learning and enhance skills	proposed which creates or adds to a need for schools and community centres, developers are required to provide and/ or contribute towards those facilities. The policy also seeks to improve access to community facilities.		
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The policy seeks to protect existing cultural and tourism assets as part of community facilities. In addition, when new residential development is proposed which creates or adds to a need for cultural and tourism assets, developers are required to provide and/ or contribute towards those facilities. The policy also seeks to improve access to community facilities.	+	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy is likely to have major significant positive effects on the SA Objectives of Health and Education and Skills; likely to be positive synergistic effects on Equality and Health when the policy is combined with Policies S 4 and C 5. Minor positive effects were identified for the Economy, City and Town Centers, Equality and Culture and Tourism. No significant negative effects have been identified; however uncertain effects were identified for the SA Objective, Green Space. Recommendations: The policy should be amended to make it apply to all types of development which would strengthen the policy and increase the certainty of positive effects; community facilities are also important for non-residential development, for example; in particular, crèche provision and youth clubs can assist parents going to work.				

POLICY C 6 – SUPPORTING HEALTHY LIFESTYLES AND WELLBEING All development should aim to support active and healthy lifestyles and must not have any adverse impacts on the health of existing or future populations that cannot be mitigated. In order to support a healthy lifestyle and wellbeing, new development will be required: • To facilitate active travel by providing a safe and integrated movement network in accordance with urban design and transport policies, • To provide a healthy living environment, residential development should meet locally set space standards and sun and daylight requirements, • To contribute to a healthier urban environment through maintaining or improving air and water quality and minimising disturbance associated with light, noise and odour, • To reduce social inequality through a mix of housing types, sizes and formats, • To mitigate and adapt to the effects of climate change through water sensitive urban design and by providing areas of shade, • To deliver public open space that is designed to be safe, encouraging active use and maximising opportunities for informal recreation, social interaction, active play and active travel District Plans will recognise and safeguard the role of allotments, agriculture and local food/farmers markets and shops in providing access to healthy, affordable and locally produced food options.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	New development is required to deliver public open space and safeguard allotments which can support	+	None.

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	Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	local biodiversity. Therefore it is likely that this Policy will lead to minor positive effects on Biodiversity.		
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	The policy sets out a requirement for new development to adapt to the effects of climate change through water sensitive urban design and by providing areas of shade.	+	The Policy could be strengthened by expanding the ways in which the development can adapt to climate change. This can be done by just inserting the word 'including' after 'climate change' and before 'through water sensitive...'
4	FLOODING Manage and reduce flood risk and surface water run-off	The policy inserts a requirement for development to include water sensitive design. Therefore, it is considered to be supportive of this SA Objective.	+	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	The policy inserts a requirement for development to maintain or improve air and water quality. Therefore, it is considered to be supportive of this SA Objective.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.

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7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	This policy supports the SA Objective of Sustainable Transport through requiring new development to facilitate active travel by providing a safe and integrated movement network in accordance with urban design and transport policies designs.	+	None.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The policy includes a requirement to ensure that new development contributes to a healthier living environment. It requires new development achieves this through improving air and water quality and minimising disturbance associated with light noise and odour. This is likely to lead to major positive effects on Pollution only. There are unlikely to be any significant environmental effects on waste.	+ + ○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES:	The policy includes a requirement to ensure that new development reduces social inequality through a mix of	+	The requirements for reducing inequality overlaps with those required by C2 and C3.

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	EQUALITY Reduce inequalities in wellbeing and opportunity	housing types, sizes and formats. This is supportive of this objective. There are likely to be positive synergistic effects combined with Policies S 4 and C 5.		Consideration should be given to going above and beyond the requirements of the other two policies to ensure the certainty of the positive effect.
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The policy sets out a requirement to deliver safe public open space and safe active travel. As a result the policy is supportive of this SA Objective. Measures to reduce crime are put forward by Policy S 4.	+	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The policy requires that all development should aim to support active and healthy lifestyles is likely to lead to major positive effects on this SA Objective. There are likely to be positive synergistic effects with Policy C 5.	++	None.
15	HOUSING	The requirements of the Policy are likely to result in the provision of homes which meet a wide range of needs leading to minor positive long-term effects.	+	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The policy seeks to deliver public open space and safeguard allotments, agricultural and local farmers markets and shops and therefore is fully supportive of this SA Objective. It is likely to lead to major positive effects on this SA objectives.	++	Consideration should be given to recognize the role of many other ways to provide access to healthy affordable and locally produced foods including community gardens. Opening the requirements up will encourage greater innovation and also more ways to provide access leading to greater certainty of the major positive effects on Green Space.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.

18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	O	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy is likely to have significant positive effects on the SA Objectives of Health, Green Space and Pollution. No negative effects identified. Minor positive effects were identified for: Housing; Equality; Sustainable Transport; Natural Environment Quality; Climate Change Adaptation; and Safety. There are positive synergistic effects identified for Equality, Safety and Health when the policy is combined with S 4 and C 5. Recommendations: ■ The Policy could be strengthened by expanding the ways in which the development can adapt to climate change. This can be achieved by just inserting the word 'including' after 'climate change' and before 'through water sensitive...' ■ The requirements for reducing inequality overlap with those required by C2 and C3. Consideration should be given to going beyond the requirements of the other two policies to ensure the certainty of the positive effect. ■ Consideration should be given to recognise the role of many other ways to provide access to healthy affordable and locally produced foods including community gardens. Opening up the requirements will encourage greater innovation and also more ways to provide access leading to greater certainty of the major positive effects on Green Space.				

POLICY C 7 – TRANSPORT REQUIREMENTS All proposals will need to include the provision of transportation measures as follows: a) All mode (walking, cycling, bus and car) accesses onto the local street network should be provided where possible to accommodate local demand (i.e. trips under 1km). b) All mode (walking, cycling, bus and car) accesses onto the principal road network should be provided at suitable locations to accommodate demand to adjacent town or city centres. c) Safe and suitable access should be located onto the existing highway network where it does not result in an unacceptable increase level of congestion. d) All new junctions should provide for safe and attractive movement for all people, including the needs of people with disabilities. e) If the assignment evidence indicates a demand for significant amounts of movements away from the adjacent centres, junction onto the Strategic Road Network should be considered. f) Opportunity to install or retro install new transport technologies such as electric charging plug-in and ultra-low emission vehicle fuelling should be facilitated. g) Parking to be provided across the site in accordance with Manual for streets 1 & 2. h) Provision of covered and secure cycle parking at local centres and community facilities.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.		None.
2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.		None.

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3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There are unlikely to be any significant environmental effects.	○	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The Policy focuses on requiring new development to provide measures to increase accessibility for all modes of transport (walking, cycling, bus and car) which is supportive of this SA Objective.	+	The Policy does not seek to maximise the use of sustainable modes of transport and reduce the need to travel by private car. If the policy included measures to achieve the above, the Policy could lead to major positive effects of sustainable transport and minor positive effects on Climate Change Mitigation, Waste and Pollution and Health (indirect). This could be done by linking the policy to Policy S4 part G which refers to encouraging sustainable transport.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.

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11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The policy main focus is to increase accessibility to sites for all modes of transport. This can help reduce inequalities in opportunity which is supportive of this SA Objective.	○ 	None.
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The policy seeks to achieve safe access to sites and surrounding facilities which is supportive of this SA Objective.	+ 	None.
14	HEALTH	There are unlikely to be any significant effects.	○	None.
15	HOUSING	There are unlikely to be any significant effects.	○	None.
16	GREEN SPACE	There are unlikely to be any significant effects.	○	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant effects.	○	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The Policy focuses on requiring new development to provide measures to increase accessibility for all modes of transport (walking, cycling, bus and car) that is safe which is supportive of the SA Objectives of Sustainable Transport and Safety. Neutral effects were identified for all other SA objectives.

The Policy does not seek to encourage the use of sustainable modes of transport and reduce the need to travel by private car. If the policy included measures to achieve the above, the Policy could lead to major positive effects on sustainable transport and minor positive effects on Climate Change Mitigation, Waste and Pollution and Health (indirect). However, this addressed by Policy S4 part G which refers to encouraging sustainable transport.

Allocation Policies

POLICY SA 1 – REQUIREMENTS FOR STRATEGIC ALLOCATIONS

Urban extensions to Cheltenham and Gloucester and Strategic allocations at Ashchurch are identified on the Proposals Plan. Individual site plans are included for each strategic allocation. The JCS should be read as a whole and the development of the Strategic Allocations will be subject to the following additional requirements:

- A. Housing will be provided at an average density level of 40 dwellings per hectare.
- B. Employment land will provide job generating uses in key growth sectors. Proposals to develop land allocated for employment use to alternative uses will be resisted.
- C. Infrastructure will be phased and provided by the developer in line with infrastructure needs arising from the development and as set out in the Infrastructure Delivery Plan.
- D. Provision of strategic and local Green Infrastructure including:
 - i. Appropriate connections to the wider countryside beyond the site
 - ii. Enhancement of existing green infrastructure by providing landscaping and structural planting throughout the development;
 - iii. improvements to existing spaces;
 - iv. retention and where appropriate enhancement of protected landscape features, habitats and ecological designations ensuring that they are integrated into new development;
 - v. enhancements to existing habitats and the local landscape.
- E. Investigation and mitigation by the developer of any contamination within the site through agreed remediation techniques.
- F. Use of established and emerging low carbon or renewable technologies to provide at least 10% of onsite energy requirements per building.
- G. Sustainable design to include use of orientation to make best use of solar gain in habitable rooms.
- H. Development should create built edge conditions that are more fragmented and visually aligned with existing landscape features of the site so as to avoid the creation of very long and unnatural linear edges. This may be achieved through the use of existing field boundaries or other existing landscape features.
- I. Use landscape buffers and green infrastructure to be provided as an integral part of the phased development to ensure the development is satisfactorily integrated within the landscape.
- J. Proposals will be required to demonstrate how new development will be integrated with and complement existing development surrounding the strategic allocation.
- K. The provision of community and education facilities where required, shall be constructed as an integral part of the residential development, to ensure the creation of sustainable neighbourhoods. Opportunities to create benefits for existing and new communities will be supported.

L. Flood storage betterment to be provided across each strategic allocation.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	Bullet point D. of the Policy sets out requirements for improvements to Biodiversity that Urban Extensions and Strategic Allocations must include. This is likely to lead to minor positive effects on Biodiversity. There are also likely to be positive effects when combined with other JCS Policies including D 2 and S 3.	+	It would be recommended that where there are overlaps with the requirements of other Policies such as S 9 and S 10, these requirements should be removed. Consideration should be given to removing 'where appropriate' in bullet D. (iv) as this would ensure the certainty of positive effects on Biodiversity.
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	Bullet points F. and G. refer to requirements which will reduce the contribution of the developments to climate change. Therefore it is likely to lead to minor positive effects. There are also likely to be positive effects when combined with other JCS Policies including D 2 and S 3.	+	Larger scale development offers greater possibilities for delivering reduced carbon emissions and increased energy efficiencies and therefore it would be suggested that the percentage of onsite renewable/ low carbon energy is increased. The 10% figure is featured in both BREEAM and Code for Sustainable Homes as a minimum to get points for the energy/ CO ₂ category. This suggestion has also been made for S 3 for other large scale development.
3	CLIMATE CHANGE ADAPTATION	The requirement sets out under bullet point D. are likely to contribute to Climate change adaptation as well as bullet point L. This is likely to lead to minor positive	+	None.

	Adapt to the consequences of climate change	effects on this SA Objective.		
4	FLOODING Manage and reduce flood risk and surface water run-off	Bullet point L. requires each Strategic Allocation to achieve flood storage betterment. This is likely to lead to major positive effects on Flooding by improving the existing baseline conditions as well as mitigating any effect the development itself has.	++	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	Many of the requirements of the Policy involve protecting and improving the quality of natural resources with the main focus on landscape. Investigation and mitigation by the developer of any contamination also supports this SA objective. Other JCS Policies such as C 6, S 2, S 6 and S 3 are likely to lead to positive synergistic effects when combined with this policy.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land	There are unlikely to be any significant environmental effects. Requirements for minimising the use of natural resources are set by other JCS Policies including S 3 and D 4.	○	None.

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	through good design			
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	There are unlikely to be any significant environmental effects. Requirements for protecting and enhancing the historic environment are set by other JCS Policies including S 6 and S 8 as well as through specific mitigation included as appropriate in each Strategic Allocation Policy.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	There are unlikely to be any significant environmental effects. Requirements for protecting and enhancing the historic environment are set by other JCS Policies including S 4, S 7 and D 1 - 4 as well as through specific mitigation included as appropriate in each Strategic Allocation Policy.	○	None.
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects. Requirements for protecting and enhancing the historic environment are set by other JCS Policies	○	None.

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	Minimise pollution and waste to landfill	including S 3, C 6 and D 2 - 3 as well as through specific mitigation included as appropriate in each Strategic Allocation Policy.		
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The Policy seeks to safeguard the land set aside for employment use of the Strategic Allocations leading to major positive effects.	++	None.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	There are unlikely to be any significant environmental effects. The location of the Strategic Allocations has been set by other JCS Policies and the effects of each location on this SA Objective have been considered through individual SA assessment of the chosen Strategic Allocations and their alternatives.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in	There are unlikely to be any significant environmental effects. Requirements which will help reduce inequalities are set by other JCS Policies including S 4, C 5 and C 6 as well as through specific mitigation included as appropriate in each Strategic Allocation Policy and through the Strategic Allocations themselves	○	None.

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	wellbeing and opportunity	providing housing and/or employment.		
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	There are unlikely to be any significant environmental effects. Requirements which reduce crime and improve safety are set by other JCS Policies including S 3, S 4, D 3 and C 7.	○	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The provision of Green Infrastructure is likely to provide open spaces for people to exercise leading to positive effects on health. In addition, requirements which will improve access to healthcare facilities and also improve health in general are set by other JCS Policies including S 4, C 5, C 6 and D 1.	+	None.
15	HOUSING	There are unlikely to be any significant environmental effects. The amount of housing that each Strategic Allocation will provide is set by other Policies in the JCS as well as the requirements for affordable housing. Accommodation for Gypsies, Travellers and Travelling Showpeople is expected to be considered on Strategic Allocations under Policy C 4.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The provision, protection and enhancement of Green Space are implicitly included in the requirement for Green Infrastructure (GI) set out in the Policy. This is likely to lead to minor positive effects on this SA Objective. There are likely to be positive synergistic effects when combined with other JCS Policies including S 4 and C 6.	+	It will be important to include provision for longer term management of such GI, perhaps through various funding mechanisms and/or community/residents groups. If not already included in the GI Assessment required under Policy D 2.

17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The policy requires that where community and education facilities are required that they should be constructed as an integral part of the residential development to ensure the creation of sustainable neighbourhoods. This is considered to be supportive of this SA Objective.	+	None
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The Policy will ensure that the strategic allocations are of the highest quality and reduce any negative effects as far as possible. This is likely to have benefits on this SA objective and therefore is considered to have minor positive effects.	+	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The Policy is likely to have significant positive environmental effects on Flooding and the Economy. It is also considered to progress other SA Objectives such as: Biodiversity; Climate Change; Natural Environment Quality; Health; Education; Green Space; and Culture and Tourism. No negative effects have been identified.

Recommendations:

- It is important to include provision for longer term management of such GI, perhaps through various funding mechanisms and/or community/residents groups (if not already included in the GI Assessment required under Policy D 2).
- There are overlaps with the requirements of other Policies such as S 9 and S 10 which could be removed from this Policy.
- Removal of 'where appropriate' in bullet point D (iv) would better ensure the certainty of major positive effects on Biodiversity.
- Larger scale development offers greater possibilities for delivering reduced carbon emissions and increased energy efficiencies and therefore it was suggested that the percentage of onsite renewable/ low carbon energy is increased. The 10% figure is featured in both BREEAM and Code for Sustainable Homes as a minimum to get points for the energy/ CO₂ category. This suggestion had also been made for S3 for other large scale development.

Delivery Policies

POLICY D 1 - INFRASTRUCTURE New development must be served and supported by appropriate on- and off-site infrastructure and services which arise as a result of individual or cumulative impact. In identifying infrastructure requirements, development proposals should demonstrate that full regard has been paid to the Infrastructure Delivery Plan and all other relevant policies of the Local Plan. Planning permission will only be granted when infrastructure and services to meet the needs of the new development, including that set out in the Infrastructure Delivery Plan, and/or mitigate the impact of the new development is already in place or will be provided to an agreed timescale. Infrastructure and services required as a consequence of development, and provision for their maintenance, will be sought from developers and secured by the negotiation of planning obligations, by conditions attached to a planning permission, and/or other agreement, levy or undertaking, all to be agreed before planning permission is granted.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	Any minor negative effects on Biodiversity resulting from new infrastructure development are likely to be mitigated by a number of other JCS Policies including S 3, S 9 and S 10. Therefore the effects are considered to be neutral.	○	None.

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2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	Requirements for new infrastructure development to reduce their contributions to climate change are set under Policy S 3. Therefore the effects are considered to be neutral.	○	
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Requirements for new infrastructure development to adapt to climate change are set under a number of JCS Policies S 2, S 3 and S 4. Therefore the effects are considered to be neutral.	○	
4	FLOODING Manage and reduce flood risk and surface water run-off	Flooding is a key issue for the JCS area and any new development is likely to increase the risk of flooding. However, it is anticipated that any minor negative effects on this SA Objective will be addressed by compliance with Policy S2. In addition, infrastructure may be in the form of flood attenuation which could contribute to a reduction in existing flood risk. Therefore the policy is considered to have minor positive effects on flooding.	+	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural	Mitigation for minor negative effects on natural resource quality resulting from new infrastructure development are also provided under a number of other Core Policies including S 2, S 6 and C 6 and therefore the effects are considered to be neutral.	○	None.

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	resources including soil, water and landscape			
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	Any minor negative effects on resource use resulting from new infrastructure development are likely to be mitigated by other JCS Policies including S 3 and S 6. Therefore the effects are considered to be neutral.	○	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	Any minor negative effects on Historic Environment are likely to be mitigated by other JCS Policies S 6 and S 8. The Policy also puts in place a safeguard for heritage assets against inappropriate density of housing and therefore the effects are considered to be neutral.	○	None.
8	SUSTAINABLE TRANSPORT	The Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services which include transport. As a	+	None.

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	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	result there are likely to be minor positive effects on transport.		
9	WASTE AND POLLUTION	There are unlikely to be any significant environmental effects.	○	None.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services which would support economic development. As a result there are likely to be minor positive effects on the Economy.	+	None.
11	CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and	The Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services which is likely to improve the viability and vitality of town centres. As a result there are likely to be minor positive effects on the City and Town centres.	+	None.

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	learning destinations			
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The provision of adequate infrastructure and services can help reduce existing inequalities in wellbeing and opportunities as well as preventing the additional ones. As a result there are likely to be minor positive effects on Equality.	+	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services which is considered to include healthcare. As a result there are likely to be minor positive effects on the Health.	+	None.
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	It is essential that housing development is accompanied by appropriate infrastructure to ensure that the housing can meet the needs of its potential residents. Safe and easy access to the housing itself and to associated service such as food stores, healthcare services is important and the Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services. As a result there are likely to be minor positive effects on the Housing.	+	None.

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16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	Access to the environment is considered to a need of JCS residents and the Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services which is likely to include green space. As a result there are likely to be minor positive effects on Green Space.	+	None.
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services including education. As a result there are likely to be minor positive effects on the Education and skills.	+	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services which would support cultural and tourism development but also would be likely to improve access to it. As a result there are likely to be minor positive effects on the Culture and Tourism.	+	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The Policy seeks to ensure that all new development must be served by appropriate on-site and off-site infrastructure and services. As a result the policy is expected to support a wide range of development types and as a consequence lead to minor positive effects on a number of SA Objectives including: Sustainable Transport; Economy; Flooding; City and Town Centres; Equality; Health; Housing; Green Space; Education; Culture and Tourism. Any minor negative effects resulting from the development of new infrastructure are likely to be mitigated by other JSC Policies.

POLICY D 2 - ASSESSMENTS Planning applications for development at the urban extensions, strategic allocations or other major development sites are required to be supported by the following assessments: • An Environmental Impact Assessment. • A Transport Assessment to include transport modelling and cumulative impact assessment where relevant. • A Strategic Flood Risk and Drainage Assessment which specifically addresses surface water. • A Waste Management Plan to include provision of space for storage of recycling facilities per dwelling. • An Ecology Assessment identifying existing biodiversity and potential for enhancement. • A Green Infrastructure Assessment including opportunities to enhance green linkages. • A Heritage Impact Assessment. • A Renewable Energy Statement. • A Noise Assessment including noise during construction and noise insulation of development. • A Dust Assessment, • A Health Impact Assessment. Other supporting information as required by the relevant local planning authority.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective. As a result it is	++	Consideration should be given to requiring that strategic allocations, urban extensions or other major development should be screened for the

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	enhance biodiversity and improve connectivity between green spaces and functional habitats	expected to have major positive effects on this SA Objective.		need to carry out an Environmental Impact Assessment (EIA) rather than to automatically requiring that they will need one. EIA is only required when projects are likely to have significant effects on the environment and automatically requiring one to be done will hinder the development process increasing time and cost and could result in development not going ahead. Careful consideration will need to be given when deciding on a definition for major development as this could affect the certainty of the positive effects identified. Furthermore, consideration should be given to inserting a requirement for a sustainability assessment to support the development as this will address all aspects in the SA framework and lead to at least minor positive effects being realized for all SA Objectives.
2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective. As a result it is expected to have major positive effects on this SA Objective.	++	None.
3	CLIMATE CHANGE	There are unlikely to be any significant environmental effects. Measures to help development adapt to	○	This Policy could be strengthened by inserting a requirement to consider climate change

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	ADAPTATION Adapt to the consequences of climate change	climate change are considered under Policies S2, S10 and C6.		adaptation measures under the renewable energy statement. This would lead to minor positive effects being realized for the SA Objective of Climate Change Adaptation.
4	FLOODING Manage and reduce flood risk and surface water run-off	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective. The need to carry out a strategic flood risk assessment will ensure that cumulative effects on flooding of other development will be assessed and addressed. As a result it is expected to have major positive effects on this SA Objective.	++	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There could be minor positive effects on landscape and tranquility as a result of major development being required to carry out a Green Infrastructure, Heritage Impact and a Noise Assessment.	+	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective. As a result it is expected to have major positive effects on this SA Objective.	++	
8	SUSTAINABLE TRANSPORT	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective. As a result it is	++	None.

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	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	expected to have major positive effects on this SA Objective.		
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective (noise, waste, dust). As a result it is expected to have major positive effects on Waste only. Mitigation for Pollution is likely to be mitigated by a number of other JCS Policies including S 3 and C 6. Therefore the effects are considered to be neutral.	+ + ○	To ensure the certainty of major positive effects consideration should be given to requiring assessments to take account of impacts arising from the construction, operation and the decommissioning of new development.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There could be indirect effects on equality as a result of major developments being required to carry out a Health Impact Assessment.	+	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.

14	HEALTH Improve access to health facilities and promote healthy lifestyles	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective. As a result it is expected to have major positive effects on this SA Objective.	++	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The policy ensures that major development assesses its possible impacts and identifies mitigation for the elements included in this SA Objective. As a result it is expected to have major positive effects on this SA Objective.	++	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The Policy requires that a number of assessments are undertaken for urban extensions, strategic allocations and for other major development. This should ensure that the likely effects are identified and appropriate mitigation is put in place to reduce and mitigate negative effects, and therefore, likely to have major significant positive effects on the following SA Objectives: Biodiversity; Climate Change Mitigation; Flooding; Sustainable Transport; Waste; Health; and Green Space. Minor positive effects have been identified for Natural Resources Quality and Equality. No negative effects have been identified.

Recommendations:

- Provision of a definition for major development as this could affect the certainty of the positive effects identified.
- Consideration should be given to inserting a requirement for a Sustainability Assessment to support the development as this will address all aspects for sustainable development in the JCS area, cumulative effects and the inter-relationships between various topics/assessments.

- Include a requirement to consider climate change adaptation measures under the renewable energy statement - leading to minor positive effects for the SA Objective of Climate Change Adaptation.
- Require assessments to take account of impacts arising from all stages of development - construction, operation and decommissioning.
- Consideration should be given to requiring that strategic allocations, urban extensions or other major development should be screened for the need to carry out a (statutory) Environmental Impact Assessment (EIA) rather than automatically requiring that they will need one. EIA is only required when projects are likely to have significant effects on the environment; automatically requiring an EIA may hinder the development process increasing time, cost and deliverability risk. It is noted that the other assessments required by this policy may cover many of the EIA topics. The requirement for a systematic process should provide more certainty for protection of the environment with positive effects; a requirement for a sustainability assessment will ensure cover for socio-economic assessments, including health, their interactions and cumulative effects.

POLICY D 3 – TRANSPORT ASSESSMENTS AND TRAVEL PLANS				
The potential impact on the existing transport network of significant movement arising from all new development including: ☐ detriment to highway safety; or ☐ increased traffic congestion; or ☐ exacerbation of noise and/or atmospheric pollution will be the subject of a pre-application Transport Assessment undertaken by the prospective developer(s) in consultation with the relevant highways authority. Any impacts so identified will be mitigated by the developer(s) either directly or through financial contributions. Where impact is severe and cannot be mitigated to the satisfaction of the local planning authority, planning permission will be refused. A travel plan will be required for new development in accordance with the thresholds in the DfT's "Guidance on Transport Assessment" or any replacement or amendment to that guidance that may from time to time emerge. A legal agreement or a unilateral undertaking will be used for the development of the travel plan, and to support and monitor its implementation.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There are unlikely to be any significant environmental effects.	○	None.
2	CLIMATE CHANGE MITIGATION	The requirement to carry out a transport assessment and mitigate any impacts and/or produce a travel plan could help reduce the amount of new traffic introduced by new development and reduce other environmental impacts with regard to this SA objective as well as noise and pollution. As a result the effects are likely to be neutral on this SA Objective.	○	None.

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3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	There are unlikely to be any significant environmental effects.	○	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There are unlikely to be any significant environmental effects.	○	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The policy requires that all new development must produce a pre-application transport assessment which considers impacts of the new development on the transport network. As a result it is likely to have a minor positive effect on Sustainable Transport.	+	None.
9	WASTE AND POLLUTION	The policy requires that all new development must produce a pre-application transport assessment which considers impacts of the new development on the	+	○ None.

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	Minimise pollution and waste to landfill	transport network including exacerbation of noise or atmospheric pollution. It requires that any impacts identified should be mitigated. As a result it is likely to have a minor positive effect on pollution only. There are unlikely to be any significant environmental effects on Waste.		
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The policy requires that all new development must produce a pre-application transport assessment which considers impacts of the new development on the transport network including highway safety. It requires that any impacts identified should be mitigated. As a result it is likely to have a minor positive effect on Safety.	+	None.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The policy requires that all new development must produce a pre-application transport assessment which considers impacts of the new development on the transport network including exacerbation of noise or atmospheric pollution. It requires that any impacts identified should be mitigated. As a result it is likely to have an indirect minor positive effect on Health.	+	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE	There are unlikely to be any significant environmental effects.	○	None.

17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.
Summary of Key Negative & Positive Effects for Sustainable Development: The policy requires that all new development must produce a pre-application transport assessment which considers impacts of the new development on the transport network and as a result it was considered likely to have minor positive effects on the SA Objectives of Sustainable Transport, Pollution and Safety with indirect positive effects on Health. No negative effects were identified.				

POLICY D 4 – MASTER PLANS AND DESIGN BRIEFS

Proposals for housing allocations and major development sites must be accompanied by a design brief that includes the following:

(i) A Vision which should;

- ☐ Exhibit a high level of ambition and design quality for the creation of tomorrow's places which could be created building on the overall vision for the district and town.
- ☐ Show how the vision is guided by achieving a distinctive identity and a strong sense of place that is derived from an understanding of the characteristics of the site, its history and its geography. This will be essential to ensuring the delivery of a place which demonstrates an enduring quality.

(ii) A Masterplan which should;

- ☐ Demonstrate a robust design process including an in-depth assessment of the site and its context, constraints and identifying those issues that have informed the vision for and design of the development;
- ☐ Show how consultation with the existing community has been incorporated;
- ☐ Show that the design requirements of the scheme work within the vision, and clearly demonstrate how the vision may be achieved;
- ☐ Define and respond to local context and create or reinforce local distinctiveness;
- ☐ Show a clear development structure and design concept;

Explain the key elements and development principles of the Masterplan to create a simple, robust and structuring framework for development that fixes: land use and density, movement and connectivity and open space and landscape;

- ☐ Set out the extent to which it is attempting to impose uniformity across the development areas?
- ☐ Contain strategic urban design principles that will be used to inform subsequent more detailed design;
- ☐ Adequately set out the design quality standards for architecture, public realm and landscape.
- ☐ Contain a mechanism for delivering the vision at more detailed stages, for example design coding;

(iii) A Design Brief which should demonstrate;

- ☐ Good levels of integration with the surrounding area both built and natural, in particular maximising existing and potential movement connections with the existing environment to encourage walking, cycling and use of public transport;
- ☐ A quality of development that creates a positive sense of place and identity through the application of high quality urban, architectural and landscape design;
- ☐ High level of accessibility and good connections to public transport, community facilities and local services;
- ☐ Community facilities, suitable infrastructure and other amenities to meet the needs of all the community, including the provision of

education and training facilities, health care, community, leisure and recreation facilities; □ A clear structure of open spaces and landscape network to ensure that open space standards are met and that the new spaces relate well to each other and to existing areas; □ How sustainability and environmental matters will be addressed including the efficient use of resources both during construction and when the development is complete.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	The design and masterplanning of development can enhance, connect and improve access to biodiversity if included as part of the design brief which could lead to minor positive effects of this SA Objective. However, Biodiversity is not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	It is recommended that the design brief should be more closely linked to the other JSC policies (where relevant to a development) so that it can demonstrate how mitigation, which is provided by those policies, will be implemented. This would ensure that any uncertain effects identified for particular SA Objectives will be positive and the Objectives include Biodiversity, Climate Change, Flooding, Historic Environment; Waste and Pollution; Safety; Green Space; and Culture and Tourism. This could be done by strengthening the wording in the last bullet of item iii). It would be recommended that the word 'environmental' be removed from the last bullet of item iii) of the Policy. This is because term 'sustainability' is understood to include environmental matters.

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2	CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	Similarly, Climate Change Mitigation is not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	Please see first recommendation for Biodiversity.
3	CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	Climate Change Adaptation is also not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	Please see first recommendation for Biodiversity.
4	FLOODING Manage and reduce flood risk and surface water run-off	Measure to reduce the risk of flooding are also not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	Please see first recommendation for Biodiversity.
5	NATURAL ENVIRONMENT AND RESOURCES:	The Policy heavily focuses on landscape as a main environmental issue to be considered in the design brief and therefore is likely to lead to major positive effects	+ + ?	Please see first recommendation for Biodiversity.

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	QUALITY Protect and improve the quality of natural resources including soil, water and landscape	on landscape. Other natural resources such as water are not mentioned explicitly as part of the design brief required by the policy and therefore the effects on other natural resources are considered to be uncertain.		
6	NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and Greenfield land through good design	The use of resources is addressed explicitly as a requirement for a design brief to include and as a result the Policy is supportive of this SA Objective.	+	None.
7	HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic environment	The design and masterplanning of development can enhance the historic environment of a site if included as part of the design brief which could lead to minor positive effects of this SA Objective. However, Historic Environment is not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	Please see first recommendation for Biodiversity.
8	SUSTAINABLE TRANSPORT	The Policy requires that for major development and housing allocations that a design brief should demonstrate a high level of accessibility as well as how	++	None.

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	Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	a maximization of existing and potential movement connections with the existing environment to encourage walking, cycling and use of public transport will be achieved. Therefore this fully supports the Sustainable Transport SA Objectives and is likely to lead to major positive effects. There are likely to be positive synergistic effects when combined with other JCS Policies including S 4.		
9	WASTE AND POLLUTION Minimise pollution and waste to landfill		?	Please see first recommendation for Biodiversity.
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	Ensuring that developments are designed effectively is likely to create business premises which are fit for purpose which create a good working environment and can even encourage inward investment. Therefore it is likely that this policy will lead to minor positive effects on this SA Objective.	+	None.
11	CITY AND TOWN CENTRES	Ensuring that developments are designed effectively can improve the feel of places, creating a sense of place which can make them more inviting. This is likely	+	None.

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	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	to support the vitality and viability of city and town centres leading to minor positive effects.		
12	SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	Ensuring that developments are designed effectively can help reduce inequalities in wellbeing and opportunity through adequate access to service and facilities and providing good quality places to live. There is also a requirement for the masterplan to show how consultation with the existing community has been incorporated enabling local people to take part in local decision making. Therefore it is likely to lead to minor positive effects.	+	
13	SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	Again, Safety is not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	Please see first recommendation for Biodiversity.
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The design brief is required to demonstrate how community facilities, suitable infrastructure and other amenities including healthcare will fit with the development. Again, ensuring that developments are designed effectively can help improve health leading to minor positive effects on Health.	+	None.
15	HOUSING	The policy applies to housing allocations and is expected to ensure that they are of a high quality which is supportive of this SA Objective. It is likely to lead	+	Careful consideration will need to be given when deciding on a definition for major development as this could affect the certainty

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	Ensure everyone has access to a decent home that they can afford and meets their needs	to long-term minor positive effects on housing. There are likely to be positive synergistic effects when combined with other JCS Policies including C 1 – 3, S 3 and S4.		of the positive effects identified.
16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	The design and masterplanning of development can enhance, connect and improve access to open spaces including Green Infrastructure if included as part of the design brief which could lead to minor positive effects of this SA Objective. However, Green Space is not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	Please see first recommendation for Biodiversity.
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The design brief is required to demonstrate how community facilities, suitable infrastructure and other amenities including education and training will fit with the development leading to minor positive effects on Health.	+	None.
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The design and masterplanning of development can enhance cultural heritage and promote tourism if included as part of the design brief which could lead to minor positive effects of this SA Objective. However, Culture and Tourism are not considered specifically in the design brief or masterplan as part of the policy where as other environmental issues which are covered by the SA Objective are. As a result the effects are considered to be uncertain.	?	Please see first recommendation for Biodiversity.
Summary of Key Negative & Positive Effects for Sustainable Development: The Policy requires that proposals for residential development and major development sites will need to be accompanied by a design				

brief, which includes a masterplan. Consideration of design and masterplanning of development has the potential to lead to significant positive effects on Landscape and Sustainable Transport with minor positive effects on a number of the SA Objectives (Natural Resources Use, Economy, Equality, Health, Housing and Education and Training). There are however a few uncertain effects with regard to SA Objectives, namely Biodiversity, Climate Change, Flooding, Historic Environment; Waste and Pollution; Safety; Green Space; and Culture and Tourism. The uncertainty is that they are not required to be specifically addressed by the design brief whereas other SA Objectives are.

Recommendations:

- The design briefs should be more closely linked to the other JSC policies (relevant to a particular development) so that it can demonstrate how mitigation, which is provided by those policies, will be implemented. This could be done by strengthening the wording in the last bullet of item iii) and this would ensure that any uncertain effects identified for particular SA Objectives will be positive.
- Remove the word 'environmental' from the last bullet of item iii) of the Policy - because the term 'sustainability' is understood to include environmental matters.
- Provision of a definition for major development as this could affect the certainty of the positive effects identified.

Appendix I: Gloucester, Cheltenham and Tewkesbury Equality and Diversity Impact Assessment - Plans, Programmes and Assessments

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Strong and Prosperous Communities White Paper 2006	The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship between central government, local government and local people.	There will be around 35 priorities for each area, tailored to local needs through Local Area Agreements. Instead of the many hundreds of indicators currently required by central government there will be a single set of about 200 outcome based indicators covering all important national priorities like climate change, social exclusion and anti-social behaviour. This indicator set will include citizen satisfaction and perception measures; and citizens and communities everywhere will be able to examine performance against the indicators to know how well their local area is doing.
Our Shared Future, 2007 (Commission On Integration and Cohesion)	Our Shared Future sets out our practical proposals for building integration and cohesion at a local level.	• Sense of shared futures • Emphasis on a new model of rights and responsibilities • New emphasis on mutual respect and civility • Deliver a visible social justice
Community Infrastructure Levy (2010)	Provides system to fund new local infrastructure through new development. CIL is a charge that will be payable by developers when they begin construction of new developments	Confirms the funding method for delivery of major aspects of the infrastructure requirements for development.
Healthy lives, healthy people: our strategy for public health in England	This White Paper sets out the Government's long-term vision for the future of public health in England. The aim is to create a 'wellness' service (Public Health England) and to strengthen both national and local leadership.	The goal is a public health service that achieves excellent results, unleashing innovation and liberating professional leadership. This White Paper builds on Equity and Excellence: Liberating the NHS to set out the overall principles and framework for making this happen.
Diversity and Equality in Planning – A good	The Government is committed to changing the culture of planning to	The aim of this Guide is to help local planning authorities address diversity and equality issues in their policies and procedures.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
practice guide 2005	make it more responsive, positive and pro-active. Diversity and equality are at the very heart of this new agenda, helping define sustainable and inclusive communities. Community involvement is one of the key themes underpinning the Government's planning reforms. The Guide illustrates an inclusive approach to community consultation.	
National Planning Policy Framework (NPPF) (2012)	The national planning policy framework aims to reform the planning system to make it less complex and more accessible, and to promote sustainable growth. The NPPF streamlines existing Planning Policy Statements, Planning Policy Guidance Notes and circulars to form a single consolidated document which promotes sustainable development. It provides a framework within which local people and authorities can produce local and neighbourhood plans.	Local Plans should set out strategic priorities to deliver: ■ To deliver a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); ■ Consider the needs of people with disabilities by all modes of transport.
Planning for Travellers 2012	The document sets out the proposed new, single Planning Policy for traveller sites.	The new policy aims to: ■ enable local planning authorities to make their own assessment to set their own pitch/plot targets ■ encourage local planning authorities to plan for sites over a reasonable timescale ■ protect Green Belt from development ■ reduce tensions between settled and traveller communities in the planning system ■ remove repetition of national planning policy that is set out elsewhere ■ remove unjustified differences in policy in the two circulars, and between the two circulars and other policy statements

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
		- remove unnecessary guidance and context so that planning policy documents contain only policy - ensure that local planning authorities, working together, have fair and effective strategies to meet need through the identification of land for sites - promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites - reduce the number of unauthorised developments and encampments and make enforcement more effective if local planning authorities have had regard to this policy - ensure that the development plan includes fair, realistic and inclusive policies increase the number of traveller sites, in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply - reduce tensions between settled and traveller communities in plan making and planning decisions - enable provision of suitable accommodation from which travellers can access education, health, and welfare and employment infrastructure.
Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society 2008	This strategy sets out the Governments' response to the global challenge of ageing. It also outlines plans for making sure that there is enough appropriate housing available in future to relieve the forecasted unsustainable pressures on homes, health and social care services.	The vision is to prepare communities for the multiple changes that they will face; to 'future proof' society so that it does not alienate or exclude; and to allow everybody, regardless of age, to participate and enjoy their home and their environment for as long as possible. To succeed in providing appropriate housing and effective care to all in a more targeted manner, there must be a coherent, joined-up, plan – that is why we need a National Strategy for Housing in an Ageing Society.
Sustainable Communities: A Shared Agenda, A Share of the Action. A guide for Local Authorities 2006	This guide shows how local outcomes such as those reflected in the seven shared priorities, can be delivered in a way that helps create genuinely sustainable communities. It highlights the cross-cutting issues which need to be addressed for each outcome.	7 Shared Priorities: - Creating safer and stronger communities - Improving the quality of life of older people and children, young people and families at risk - Meeting transport needs more effectively - Promoting healthier communities and narrowing health inequalities - Promoting the economic vitality of localities - Raising standards across our schools

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
		Transforming the local environment
Joining Up - Culture South West, 2004	Encourages increased participation in cultural activities across the South West, seeks to improve the quality and relevance of the regions cultural activities and aims to celebrate the regional identity and rich diversity of South West cultural life and tradition.	No specific targets, objectives or indicators.
Creating Sustainable Communities In The South West 2005 - ODPM	Outlines much of the work being done to create sustainable communities in the South West.	- Delivering a better balance between housing supply and demand; - Ensuring people have decent places to live; - Tackling disadvantage; - Delivering better services through strong effective local government; and - Promoting the development of the region
Leadership Gloucestershire	Leadership Gloucestershire (LG) brings together public sector organisations which allocate and spend significant resources in Gloucestershire. Its role is to provide vision, leadership and strategic direction in those areas where it is vital for organisations to work together to meet the needs of the people and communities of Gloucestershire in the most cost effective way. LG will work together to reduce current costs, minimise future costs and deliver better outcomes for the benefit of the people of Gloucestershire. They will work with others to achieve their objectives.	Draft work programme for 2013/ 2014 includes the following priorities: - Gloucestershire Health & Wellbeing Board - To oversee the effective functioning of the Gloucestershire Health and Wellbeing Board - Driving economic Growth - To work with the Gloucestershire Local Enterprise Partnership (LEP) to ensure they lead and champion the economic growth agenda. - Police and Crime - To maintain oversight of police and crime issues, recognising the roles of the new Independent Police and Crime Commissioner and the Police and Crime Panel as scrutiny body. - Planning and Infrastructure - The adoption of a "Gloucestershire family" approach to planning and infrastructure development. - Assets - The development of a "One Gloucestershire" approach to assets/estates. - Shared Services - To oversee the public sector approach to shared services. - Troubled Families/Community Budgets - To oversee the development of the Troubled Families/Community Budget initiatives. - Promoting Gloucestershire - To promote Gloucestershire and the agreed

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
The Cultural Strategy for the South West 'In search of Chunky Dunsters' 2001 – Culture South West	By 2010 there will have been a major, measurable increase in the number of people who take part in, enjoy and value a range of enhanced cultural activities across the region.	priorities. • Encourage increased access to and participation in cultural activities across the South West, capitalising on the latest developments in Information and Communications Technology. • Improve the quality and relevance of the region's cultural facilities and activities. • Support and help develop the South West's cultural and creative industries. • Celebrate our regional identity and the rich diversity of South West cultural life and traditions.
Gloucestershire Integrated Economic Strategy 2009 -2015	"To create and foster in Gloucestershire a sustainable, low carbon economic environment in which businesses flourish, communities thrive, and individuals have the opportunity to reach their potential".	The purpose of the Gloucestershire Economic Strategy 2009-2015 is to: ■ Establish an ambitious vision for the Gloucestershire economy together with the key priorities that will deliver this vision. ■ Provide a strategic framework to guide investment in the County's infrastructure and economy. ■ Use and influence national policies and regional strategies and plans to the benefit of Gloucestershire. ■ Provide the clarity to enable an effective Three Year Delivery Plan, revised annually, to be agreed and delivered by partners. ■ Guide the development of Joint Strategic Commissioning Plan (JSCP) targets – The five themes in the JSCP's are Safer & Stronger Communities, Healthier Communities and Older People, Children & Young People, Natural & Built Environment and Economic Development & Enterprise for which Gloucestershire First is responsible. ■ Replace with a single economic strategy the previous Economic, Rural, Urban and Energy Strategies.
The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)	The original strategy was developed by the Tewkesbury Borough Local Strategic Partnership which brings together key agencies, organisations and partnerships from the public, private, community and voluntary sectors.	Vision: A Borough of healthy, strong, thriving and sustainable communities, both rural and urban, where people want to live, work and visit. • Ambition 1: A Thriving Economy • Ambition 2: A Healthy, Safe & Inclusive Community • Ambition 3: A Sustainable Natural & Built Environment

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	The Sustainable Community Strategy plays an important role in providing the long term vision which takes into account these challenges whilst continuing to deliver our local communities priorities	
Cheltenham Sustainable Community Strategy: Our Cheltenham, Our Future, 2008–2011	The Strategy has been prepared by the Cheltenham Strategic Partnership, which brings together the key organisations and partnerships in the Borough. The strategy aims to fulfil the following vision for Cheltenham: "To deliver a sustainable quality of life, where people, families, their communities and businesses thrive; and in a way which cherishes our cultural and natural heritage, reduces our impact on climate change and does not compromise the quality of life of present and future generations".	The Sustainable Community Strategy is underpinned by 3 principles: • The principle of community engagement and participation; • The principle of tackling inequalities and promoting cohesion; and • The principle of tackling climate change The Sustainable community strategy also contains a set of thematic ambitions to: • Promote community safety; • Promote sustainable living; • Promote a strong and sustainable economy; • Build healthy communities and support older people; • Build stronger communities and support housing choice; • Focus on children and young people; • Invest in environmental quality; • Invest in travel and transport; and • Invest in arts and culture.
Gloucester City Vision 2012 - 2022	The Gloucester City Vision 2012- 2022 document sets out what we want to achieve for the City over the next ten years. The City Vision lays out our key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver. The City Vision will provide an overarching framework for all partner's strategic plans including important City Council documents such	Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. Aims: • A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors. • A vibrant evening economy. • A City which improves through regeneration and development. • A City where people feel safe and happy in their community. • A healthy City with opportunities available to all.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	as the Joint Core Strategy and the Gloucester City Plan.	
Tewkesbury Borough Council Empty Homes Strategy 2008 - 2013	The new Empty Homes Strategy includes bringing together information and actions from existing strategies to encourage owners to bring their properties back into use and ultimately to deter them from leaving their homes empty.	The aims and objectives of the Empty Homes Strategy include: ■ To maximise the re-use of empty homes and other buildings ■ To provide good quality affordable housing ■ To ensure programmes meet a range of housing needs, whilst providing a choice of accommodation and neighbourhood
Cheltenham Borough Council Vacant Property Strategy / Framework 2011 - 2015	The key aim of this strategy is to encourage owners to bring their properties back into use and ultimately to deter them from leaving their homes empty.	Other aims and objectives: ■ To maximise the re-use of empty homes and other buildings ■ To minimise the need for the future development of greenfield sites and protect the environment ■ To improve and conserve the existing built environment ■ To help provide good quality affordable housing ■ To ensure programmes meet a range of housing needs, whilst providing a choice of accommodation and neighbourhood ■ To raise public awareness of the issue of empty homes ■ To maintain robust records on empty properties and to monitor trends.
Tewkesbury Borough Council Housing and Homelessness Strategy 2012 - 2016	The Housing and Homelessness Strategy 2012-2016 takes into account the aims of the national strategy but also considers how Tewkesbury will need to work at a more local level to make a real difference to residents across Tewkesbury Borough.	The strategy has four main themes under which a number of priority actions have been identified, each with objectives to be achieved: 1. Housing supply and delivery of good quality affordable housing 2. Homelessness and Homelessness Prevention 3. Housing to meet the housing needs of specific groups 4. Neighbourhoods and housing standards

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Cheltenham Borough Council Housing and Homelessness Strategy 2012 - 2017	The Housing and Homelessness Strategy 2012-2017 takes into account the aims of the national strategy but also considers how Cheltenham will need to work at a more local level to make a real difference to residents across Cheltenham Borough.	Vision: 'is for residents to be able to access and maintain suitable, affordable accommodation within communities that are safer, stronger and healthier. It sets out the following priorities: ▪ Priority 1: To increase the provision of Affordable Housing ▪ Priority 2: To make best use of existing housing stock ▪ Priority 3: To improve access into suitable, affordable accommodation and helping households to stay in their homes for longer ▪ Priority 4: To tackle the causes of homelessness ▪ Priority 5: To create stronger, safer and healthier communities
Gloucestershire Health and wellbeing Strategy 2012 – 2032 – Fit For The Future	The aspiration of this strategy is to continue to improve the quality of life for everyone in Gloucestershire within available resources. This is why the strategy spans 20 years, and it aims to be implemented through three-year action plans that are refreshed annually. This will enable measurement of progress in the short, medium and longer term.	Uses the life-course approach: ■ Starting well – with a focus on pregnancy and early years to give every child the best start in life ■ Developing Well – a focus on children and young people maximising their capabilities and control over their own lives ■ Living and Working Well – a focus on promoting healthy lifestyles; equitable access to ill-health preventative services; healthy and sustainable physical environments; building social networks and communities and access to good employment opportunities ■ Ageing Well – promoting independence, physical and mental health and wellbeing post-retirement. Under each of the above headings it sets aspirations to achieve in the Gloucestershire area.
YOUR HEALTH, YOUR CARE Our five year vision for Health and Social Care	Over the next five years Your Health, Your Care seeks to support the aspiration of the Health and Wellbeing strategy by putting in place the building blocks to ensure that we can continue to improve the quality of life for everyone in Gloucestershire.	The vision for Gloucestershire Health Community is to have: ■ Joined up care for the people of Gloucestershire ■ People empowered to take more control over their own care ■ Mainstream services that are accessible by all vulnerable people, wherever they may live ■ Enhanced outcomes for the population ■ Improved use of resources

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Gloucestershire Children and Young People's Partnership Plan 2012-15 (refreshed version: 2013-14)	'To ensure our children and young people thrive and reach their full potential; providing appropriate support for those families who need it most'	Our vulnerable children, young people and families have an entitlement to Early Help; Targeted Interventions and for some, Intensive Intervention to: ■ Enjoy the best start in life ■ Maximize their capabilities and have control over their own lives ■ Be safe from injury, exploitation and harm ■ Work well together to provide right and timely effective intervention for vulnerable children and families as early as possible
Draft Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA) 2013	The SA/SEA of the JCS has been ongoing since 2008 and is being undertaken alongside the preparation of the plan. This report sets out the SA/SEA of alternatives – reasons for consideration, assessment methods and findings, reasons for selection/rejection, reporting and consultation - throughout the period from 2008-2013. The JCS was assessed against a number of environmental objectives and following the assessment the contents of the JCS has been amended accordingly to reduce/ mitigate any significant impacts.	The SA Framework includes a number of Objectives which either directly or indirectly seek to reduce inequalities.

Appendix II: Equality and Diversity Impact Assessment (EqIA)

EqIA Key and Method Notes:

The assessment uses a simplified version of the SA/SEA appraisal key applied across the plan's policies, with the assessment informed by decision aiding questions:

- Will the policy have a negative effect on any of the protected characteristics?
- Will the policy have a negative effect on any of the protected characteristics?
- How can identified negative effect be minimised or removed?
- How can identified positive effect be improved or enhanced?
- Is monitoring of the issues required?

Assessment Key	
+	Positive Effect
-	Negative effect
○	Neutral Effect
?	Unknown or Uncertain Effect

Vision

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Vision	+	+	+	+	+	+	+	+	+
Commentary ■ The vision should benefit all groups as it seeks to provide greater access to places in which all groups live, work and socialise. The high standards and quality of design sought to be achieved will have positive effects on all groups improving their quality of life and meeting the needs of each group's distinctive and individual needs. ■ Avoidance of development increasing the risk of flooding is particularly positive for specific social groups (the elderly, gypsies and travellers¹ and disabled people) as they are more likely to be adversely affected by flood events. ■ The third paragraph relating to character and identity could be improved to address the needs of all protected characteristics. This can be done by amending the third paragraph of the Vision to read 'the character and identity of individual communities will have been retained while improved access to housing will have addressed the needs of [all including] the needs of young families, single people and the elderly.									

¹ Planning Policy for Travellers Sites (2012) (requires that plan policies do not locate traveller sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans (Page 4).

Strategic Objectives

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Plan Objectives									
Building a strong competitive economy	+	+	+	+	+	+	+	+	+
Ensuring the vitality of town centres	+	+	+	+	+	+	+	+	+
Supporting a prosperous rural economy	+	+	+	+	+	+	+	+	+
Conserving and enhancing the environment	+	+	+	+	+	+	+	+	+
Delivering excellent design in new developments	+	+	+	+	+	+	+	+	+
Meeting the challenges of climate change	+	+	+	+	+	+	+	+	+
Promoting sustainable transport	+	+	+	+	+	+	+	+	+
Delivering a wide choice of quality homes	+	+	+	+	+	+	+	+	+
Promoting healthy communities	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Commentary The majority of the Plan Objectives will have a positive effect on all protected characteristics. In particular, 'Delivering excellent design in new development,' 'Promoting sustainable transport,' and 'Meeting the challenge of climate change' will have greater positive effects on all social groups by improving accessibility, providing buildings which will meet their needs and be of a good quality and also providing flexible and adaptable buildings/ places which are resilient to climate change and flooding. None of the Objectives are biased towards one particular Protected Characteristic.									

Development Distribution Strategy

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Urban Focus Approach	+	+	+	+	+	+	+	+	+
Commentary The strategic approach to distributing development should benefit all groups as it seeks to provide the general location(s) of housing and employment opportunities mainly in existing urban areas. There will some development in rural areas which will have the same positive effects albeit to a much lesser extent. The location of the development mainly in urban areas will allow access to existing services and facilities and may provide opportunities for enhancement as a result of the development. Accessibility to transport is likely to be higher in urban areas and any increase in the population as a result of development may help to make sustainable forms of transport more viable which will have positive effects on all protected characteristics.									

Joint Core Strategy Policies

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Strategic Policies									
SP 1 – SCALE OF NEW DEVELOPMENT	+	+	+	+	+	+	+	+	+
SP 2 – DISTRIBUTION OF DEVELOPMENT	+	+	+	+	+	+	+	+	+
SP 3 – DELIVERY	+	+	+	+	+	+	+	+	+
Commentary ■ Policies SP 1 and SP 2 should benefit all groups as they seek to increase the availability of housing and increase employment opportunities mainly in existing urban areas. There will some development in rural areas which will have the same positive effects albeit to a much lesser extent. ■ The aim of the Policy SP 3 is to require that the three Councils review the Joint Core Strategy at regular intervals to ensure that this strategy will be delivered and that it continues to meet the needs of the area and thus is likely to have positive effects on all groups.									
Core Policies									
E 1 – EMPLOYMENT	+	+	+	+	+	+	+	+	+
E 2 – VITALITY & VIABILITY CENTRES	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
S 1 – PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT	+	+	+	+	+	+	+	+	+
S 2 – FLOOD RISK MANAGEMENT	+	+	+	+	+	+	+	+	+
S 3 – DESIGN AND CONSTRUCTION	+	+	+	+	+	+	+	+	+
S 4 – DESIGN REQUIREMENTS	+	+	+	+	+	+	+	+	+
S 5 – GREEN BELT	+	+	+	+	+	+	+	+	+
S 6 - LANDSCAPE POLICY	+	+	+	+	+	+	+	+	+
S 7 – COTSWOLD AONB	+	+	+	+	+	+	+	+	+
S 8 – BUILT AND HISTORIC ENVIRONMENT	+	+	+	+	+	+	+	+	+
S 9 – CONSERVATION AND IMPROVEMENT OF BIODIVERSITY AND	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics									
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
GEODIVERSITY									
S 10 – GREEN INFRASTRUCTURE	+	+	+	+	+	+	+	+	+
S 11 – RENEWABLE ENERGY DEVELOPMENT	+	+	+	+	+	+	+	+	+
C 1 – RESIDENTIAL DEVELOPMENT	+	+	+	+	+	+	+	+	+
C 2 – HOUSING MIX AND STANDARDS	+	+	+	+	+	+	+	+	+
C 3 – AFFORDABLE HOUSING	+	+	+	+	+	+	+	+	+
C 4 – GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE	+	+	+	+	+	+	+	+	+
C 5 – COMMUNITY FACILITIES	+	+	+	+	+	+	+	+	+
C 6 – SUPPORTING HEALTHY LIFESTYLES AND WELLBEING	+	+	+	+	+	+	+	+	+
C 7 – TRANSPORT REQUIREMENTS	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics									
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Commentary - All the Core Policies seek to ensure that all people (including protected groups) in the JCS area will have a high quality environment in which to live, work, learn and socialise. - Of particular importance to the protected characteristics are the Policies: C 1 – C 7, S 2 – S 4, S 11 and E 1 – 2. These ensure that high quality spaces are made which provide housing, employment and community facilities which will meet the needs of the all and are accessible to all. The Policies will also ensure that these places are safe, vibrant, healthy and inclusive. In addition, particular focus has been given to the need to develop the type, size and tenure of housing to meet the needs of the high number of people who are married or within civil partnerships in the area compared to the national average², the high number of young mothers (aged 20 to 24) in Gloucester City compared to the national average³, and high percentage of population which are over 65 within the Tewkesbury Borough compared to Cheltenham, Gloucester City and the national average⁴. These are considered to lead to the greatest positive effects on all groups. - Other Policies such as S 5 – S 10 and S 1 are also likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. - Consideration should be given to amending the wording of bullet 4, paragraph two of Policy C 6 to allow for other									

² Gloucestershire County Council (2013) Gloucestershire Equality Profile 2013 (p5). Online at <http://www.maiden.gov.uk/InstantAtlas/Equalities/summary.pdf>

³ Gloucestershire County Council (2013) Gloucestershire Equality Profile 2013 (p7). Online at <http://www.maiden.gov.uk/InstantAtlas/Equalities/summary.pdf>

⁴ Gloucestershire County Council (2013) Gloucestershire Equality Profile 2013 (p2). Online at <http://www.maiden.gov.uk/InstantAtlas/Equalities/summary.pdf>

EqIA Protected Characteristics									
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
ways to reduce social inequality other than through mix of housing types, sizes and formats. This would broaden the positive effects on the protected characteristics.									
Allocation Policies									
SA 1 – REQUIRMENTS FOR STRATEGIC ALLOCATIONS	+	+	+	+	+	+	+	+	+
POLICY A1 – INNSWORTH 7 TWIGWORTH URBAN EXTENSION, GLOUCESTER	+	+	+	+	+	+	+	+	+
POLICY A2 – NORTH CHURCHDOWN URBAN EXTENSION, GLOUCESTER	+	+	+	+	+	+	+	+	+
POLICY A3 – SOUTH CHURCHDOWN URBAN EXTENSION, GLOUCESTER	+	+	+	+	+	+	+	+	+
POLICY A4 – NORTH BROCKWORTH URBAN EXTENSION, GLOUCESTER	+	+	+	+	+	+	+	+	+
POLICY A5 – NORTH WEST CHELTENHAM URBAN EXTENSION, CHELTENHAM	+	+	+	+	+	+	+	+	+
POLICY A6 – SOUTH CHELTENHAM – LECKHAMPTON URBAN EXTENSION, CHELTENHAM	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics									
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
POLICY A7 – SOUTH CHELTENHAM – UP HATHERLEY URBAN EXTENSION, CHELTENHAM	+	+	+	+	+	+	+	+	+
POLICY A8 – MOD SITE AT ASHCHURCH STRATEGIC ALLOCATION	+	+	+	+	+	+	+	+	+
POLICY A9 – ASHCHURCH STRATEGIC ALLOCATION	+	+	+	+	+	+	+	+	+
Commentary ■ The Allocation Policies set out the sites which are to provide a large proportion of new housing and employment land across the JCS area. They are subject to the requirements of the other JSC Policies but also include additional requirements which are specific to the sites and therefore are considered to all lead to positive effects on the protected characteristics. ■ Particular additional requirements such as flood storage betterment across the whole of the site, sustainable design and provision of community and education facilities where required are likely to secure further positive effects.									
Delivery Policies									
D 1 – INFRASTRUCTURE	+	+	+	+	+	+	+	+	+
D 2 – ASSESSMENTS	+	+	+	+	+	+	+	+	+
D 3 – TRANSPORT ASSESSMENTS AND	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
TRAVEL PLANS									
D 4 – MASTER PLANS AND DESIGN BRIEFS	+	+	+	+	+	+	+	+	+
Commentary - All the Delivery Policies are likely to have positive effects on all protected characteristics as they seek to ensure that all new development is planned effectively, supplies or contributes to necessary infrastructure and that transport accessibility and safety are of the highest importance. Policy D 2 focuses on a number of assessment requirements which will help identify and provide mitigation for the effects of major developments and one of the requirements, to produce a Health Impact Assessment, will particularly benefit all protected groups. - Consideration should be given to requiring that all proposals for major development are accompanied by a Sustainability Assessment which should include consideration of equality and diversity. This will identify any existing and potential inequalities resulting from development in an area and help suggest ways to improve equality leading to stronger positive effects on all protected groups.									

Appendix XI: Sustainability Appraisal (SA) of New Policies and Significantly Changed Policies/ Allocations

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
- -	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
-	+	The SA Objectives 5, 6, 9, 13 and 14 consider more than one topic and as a result the plan could have different effects upon each topic considered. For example, Objective 6 includes a number of topics including soils, previously developed land, water use and Green Belt. A site/ policy within the plan could have a negative effect on the topic Green Belt but also have a positive effect on previously developed land and therefore this could lead to two symbols being shown.

Appendix XI: Sustainability Appraisal (SA) of New Policies and Significantly Changed Policies/ Allocations

POLICY INF8 – DEVELOPER CONTRIBUTIONS Arrangements for direct implementation or financial contributions towards the provision of infrastructure and services required as a consequence of development including its wider cumulative impact, and provision where appropriate for its maintenance, will be negotiated with developers before the grant of planning permission. Where, having regard to the on- and/or off-site provision of infrastructure, there is concern relating to the viability of the development, an independent viability assessment, funded by the developer and in proportion with the scale, nature and/or context of the proposal, will be required to accompany planning applications. The submitted assessment and its methodology may be independently appraised. This policy contributes towards achieving Objectives 1, 3, 4, 6, 7 and 9				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY	There is the potential for positive effects through provision of Green Infrastructure as part of developer contributions; encouraged through Policy INF4 GI but with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	+	None.
			?	
2	CLIMATE CHANGE MITIGATION	Uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	?	None.
3	CLIMATE CHANGE ADAPTATION	Uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	?	None.
4	FLOODING	There is the potential for positive effects through provision of flood storage betterment & improvements to flood defences as part of developer contributions;	?	None.

Appendix XI: Sustainability Appraisal (SA) of New Policies and Significantly Changed Policies/ Allocations

		uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.		
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	Uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	?	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	There is the potential for positive effects through provision of sustainable use of water & carbon neutrality as part of developer contributions; encouraged through Policies SD4 & 5 on sustainable design & construction - but with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	?	None.
7	HISTORIC ENVIRONMENT	There are unlikely to be any significant environmental effects.	○	None.
8	SUSTAINABLE TRANSPORT	There is the potential for positive effects through provision of sustainable transport as part of developer contributions; with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	?	None.
9	WASTE AND POLLUTION	There is the potential for positive effects through provision of sustainable design & construction as part of developer contributions; encouraged through Policies SD 4 & 5 but with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	?	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There is the potential for positive effects through provision of sustainable design & construction as part of developer contributions; encouraged through Policies	?	None.

Appendix XI: Sustainability Appraisal (SA) of New Policies and Significantly Changed Policies/ Allocations

		SD 4 & 5 but with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.		
12	SUSTAINABLE COMMUNITIES: EQUALITY	There is the potential for positive effects through provision of community and green infrastructure as part of developer contributions; but with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	+	None.
13	SUSTAINABLE COMMUNITIES: SAFETY	There are unlikely to be any significant environmental effects.	○	None.
14	HEALTH	There is the potential for positive effects through provision of community and green infrastructure as part of developer contributions with indirect and cumulative effects on health; but with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	+	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE	There is the potential for positive effects through provision of Green Infrastructure as part of developer contributions; encouraged through Policy INF 4 GI but with uncertainty as depends on more detailed studies at next levels of plan-making and SA/environmental assessment.	+	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The Policy works in synergy with Policy INF7 – Infrastructure Delivery and requires that new infrastructure or contributions to proposed development will be negotiated before the grant of planning permission. It also requires an independent viability assessment to be carried out by the developer to ensure the delivery of new infrastructure is viable.

The Policy should ensure that new infrastructure and/or improvements to existing infrastructure are appropriate to the scale, nature and/or context of the proposal put forward and therefore should ensure the successful delivery and consequently the certainty of positive effects identified for the plan with regard to infrastructure requirements.

Whilst positive effects are indicated through the potential for developer contributions towards transport, community and green infrastructure, there is uncertainty as this depends on more detailed studies at next levels of plan-making and SA/environmental assessment.

Policy C6 – Health and Environmental Quality High quality development should protect and seek to improve environmental quality. Development should not create or exacerbate conditions that could impact on human health or cause health inequality. New development must: - Cause no unacceptable harm to local amenity including the amenity of neighbouring occupants. - Result in no exposure to unacceptable risk from existing or potential sources of pollution. For example by avoiding placing sensitive uses in locations where national or EU limit values are exceeded, or by incorporating acceptable mitigation measures into development. - Ensure that any risks associated with land instability are satisfactorily resolved. Proposals for development at strategic allocations, and other development proposals at the discretion of the local planning authority, must be accompanied by a health impact assessment.				
	Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short – medium term (5-10 years)/long term (10 – 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		Mitigation Possibilities, Residual Effects Recommendations for plan-making
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	Requirements for new developments are likely lead to indirect minor positive effects on Biodiversity in both the short- and long-term. The requirements which will have beneficial impacts on biodiversity include that new development must: not result in unacceptable levels of air, noise, water, light or soil pollution or odour, either alone or cumulatively, with respect to relevant national and EU limit values; incorporate, as appropriate, the investigation and remediation of any land contamination within the site; have regard to any areas of tranquillity that are identified in adopted or emerging district and neighbourhood plans; and avoid any adverse impact from artificial light on intrinsically dark landscapes.	+	None.

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2	CLIMATE CHANGE MITIGATION	There are unlikely to be any significant environmental effects.	○	None.
3	CLIMATE CHANGE ADAPTATION	There are unlikely to be any significant environmental effects.	○	None.
4	FLOODING	There are unlikely to be any significant environmental effects.	○	None.
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY	New development must: result in no unacceptable levels of air, noise, water, light or soil pollution or odour, either alone or cumulatively, with respect to relevant national and EU limit values; have regard to any areas of tranquillity that are identified in adopted or emerging district and neighbourhood plans; incorporate, as appropriate, the investigation and remediation of any land contamination within the site; and avoid any adverse impact from artificial light on intrinsically dark landscapes. Therefore, it is considered to be supportive of this SA Objective and lead to major positive effects in both the short- and long-term.	++	None.
6	NATURAL ENVIRONMENT AND RESOURCES: USE	New development is required to take into account the quality and versatility of any agricultural land affected by proposals, recognising that the best agricultural land is a finite resource. This is likely to lead to minor positive effects in the long-term on this SA Objective as it considers the future provision of food.	+	None.
7	HISTORIC ENVIRONMENT	Requirements for new developments are likely lead to indirect minor positive effects on the historic	+	None.

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	Protect and enhance the area's distinctive historic environment	environment in both the short- and long-term. The requirements which will have beneficial impacts on heritage assets include that new development must: not result in unacceptable levels of air, noise, water, light or soil pollution or odour, either alone or cumulatively, with respect to relevant national and EU limit values; have regard to any areas of tranquillity that are identified in adopted or emerging district and neighbourhood plans; and avoid any adverse impact from artificial light on intrinsically dark landscapes.		
8	SUSTAINABLE TRANSPORT	There are unlikely to be any significant environmental effects.	○	None.
9	WASTE AND POLLUTION Minimise pollution and waste to landfill	The policy includes several requirements which new development must adhere to in terms of not resulting in unacceptable levels of a wide range of pollution types and protecting new development from existing sources of pollution. This is likely to lead to major positive effects on Pollution only. There are unlikely to be any significant environmental effects on waste.	+ + ○	None.
10	THE ECONOMY	There are unlikely to be any significant environmental effects.	○	None.
11	CITY AND TOWN CENTRES	There are unlikely to be any significant environmental effects.	○	None.
12	SUSTAINABLE COMMUNITIES: EQUALITY	There are unlikely to be any significant environmental effects.	○	None.
13	SUSTAINABLE	There are unlikely to be any significant environmental	○	None.

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	COMMUNITIES: SAFETY	effects.		
14	HEALTH Improve access to health facilities and promote healthy lifestyles	The policy requires that development should not create or exacerbate conditions that could impact on human health or cause health inequality. It recognises that health and environmental quality are linked. The policy also requires that certain proposals for development, at the Local Planning Authority's discretion, must be accompanied by a health impact assessment. Therefore it is considered that this policy is likely to lead to major positive effects on Health.	++	None.
15	HOUSING	There are unlikely to be any significant environmental effects.	○	None.
16	GREEN SPACE	There are unlikely to be any significant environmental effects.	○	None.
17	EDUCATION AND SKILLS	There are unlikely to be any significant environmental effects.	○	None.
18	CULTURE AND TOURISM	There are unlikely to be any significant environmental effects.	○	None.

Summary of Key Negative & Positive Effects for Sustainable Development:

The Policy recognises that health and the quality of the environment are intrinsically linked with many of the requirements ensuring that pollution is minimised, the environmental characteristics of an area are maintained and that new development is protected from unacceptable existing environmental risks. The policy also requires that certain proposals for development, at the Local Planning Authority's discretion, must be accompanied by a health impact assessment. As a result the Policy was identified as being likely to lead to significant positive effects on the SA Objectives of Health, Natural Environment and Resources (Quality) and Pollution. Minor positive effects were identified for: Biodiversity; Natural Environment and Resources (Use); and Historic Environment. No negative effects were identified.

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SA1 – Strategic Allocations Policy, A1 Innsworth			
Sustainability Appraisal Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		Description: H=55.7 ha,1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
1	BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no internationally protected habitats¹ on or adjacent to the site although there is one nationally protected area Innsworth Meadow – as a SSSI and Priority BAP² Habitat for lowland meadow (condition - recovering favourable). Therefore no significant negative effects on protected biodiversity. There is some 40-50% overlap by area with this meadowland in the NW corner of the proposed housing with potential negative effects but also potential positive effects if the meadowland could be improved as part of the masterplanning. There are no LNRs in the area (see SA Objective No 16 Green Space). A strong area of GI following the valleys of the Hatherley Brook is indicated on the proposals map. There are possibilities for very positive effects by enhancing the protected lowland meadow with improved connectivity to a wider managed floodplain habitat –both in the short and longer terms. Potential for new GI along the Hatherley Brook to be actively managed for biodiversity purposes in line with Policy INF4 will have major positive effects. The effectiveness of such enhancement will be dependent upon the implementation of SA 1 (Strategic allocations) and other Core Policies together with clear planning briefs and masterplanning. The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is also provided in the wording of SD10.	++

¹ Defra (2014) Magic – Statutory Rural Designations - <http://magic.defra.gov.uk> [accessed March 2014]

² Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk> (accessed March 2014)

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2	CLIMATE CHANGE MITIGATION	There is potential to reduce contribution to climate change on the site through compliance with Policies SD4, SD5 and INF4. This is likely to lead to minor positive effects in the long-term on climate change mitigation.		
	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.		
3	CLIMATE CHANGE ADAPTATION	The requirements reducing flood risk under Policy INF3 will contribute to positive effects for climate change adaptation (and see SA Objective No. 4 Flooding following).		
	Adapt to the consequences of climate change	The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS. Climate change adaption measures are required by Policy SD4 and as a result, the effects on climate change adaptation are expected to be minor positive.		
4	FLOODING	The Hatherley Brook is subject to flooding (Zone 2 and 3) ³ . The strategic site allocation proposes development outside the flood zones and GI in the flood zones thus reducing flood risk. The		

³ Environment Agency (2014) Flood Maps. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed March 2014]

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	Manage and reduce flood risk and surface water run-off	requirement for flood storage betterment across the site as recommended in SFRA2⁴ to improve the capacity of the floodplain upstream of Longford will have wider positive effects for flood risk management. Policy INF3 and this will have positive effects in short to long-term.	
5	NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	The site lies within a drinking water protected area which is identified as being 'probably at risk' and lies on a minor aquifer which is considered to be of high vulnerability.⁵ Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction. Further mitigation to protect water quality at the development management level in line with that provided by Policies INF3, SD15 and SD4 may be required. The area is not in or adjacent to any landscape designations and is described as suburban⁶ and being in an area of medium - low sensitivity landscape⁷. Therefore the effects of the development are unlikely to be significant and the landscape could be replaced or substituted – or improved. Emerging Policy SA 1 requires a fragmented development edge where practical and integration of landscape buffers with GI – effectiveness of such mitigation depends upon details of Core Policies and details of planning brief and masterplanning.	-

⁴ Halcrow Group Ltd (July 2012) Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Strategic Flood Risk Assessment for Local Development Framework Level 2. Online at <http://www.gct-jcs.org/EvidenceBase/StrategicFloodRiskAssessment.aspx> [Accessed March 2014]

⁵ Environment Agency (2014) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed March 2014]

⁶ Defra (2014) Magic – Landscape <http://magic.defra.gov.uk> [accessed March 2014]

⁷ Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis

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6	NATURAL ENVIRONMENT AND RESOURCES: USE	There will be loss of soils (lime-rich loamy and clayey soils with impeded drainage) but the land is not classified ⁸ as important agricultural land (grade 2 and 3) and such loss is of minor significance.		
	Minimise the use of natural resources including soil, water and Greenfield land through good design	As mentioned previously, the site lies within a drinking water protected area which is identified as being 'probably at risk.'⁹ Development could have minor negative effects on water use through potential for increased demand from new residential and community facilities. The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning. The strategic site is situated on Greenfield land in the Green Belt but is considered to contribute less than other areas as identified in the Greed Belt Review¹⁰. Therefore the potential major negative effects on setting are less, the proposed GI will act as a landscape buffer; uncertainty as depends upon details of planning brief and masterplanning.		
7	HISTORIC ENVIRONMENT	Gloucester has a rich, important and distinctive historic heritage and environment. There are no conservation areas, listed buildings or scheduled monuments on or adjacent to the allocation site ¹¹ . In addition, protection for the historic environment is provided in the wording of Policy SD9; thus effects are likely to be neutral.		
	Protect and enhance the area's distinctive			

⁸ Defra (2014) Magic – Agricultural Land Classification <http://magic.defra.gov.uk> [accessed March 2014]

⁹ Environment Agency (2014) Flood Maps Online at ([http\](http://maps.environment-agency.gov.uk))maps.environment-agency.gov.uk [accessed March 2014]

¹⁰ Green Belt Review (2011) <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf> (accessed March 2014)

¹¹ English Heritage (2014) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed March 2014]

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		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		
	historic environment	However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.		
8	SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The potential allocation has a network of footpaths which could be enhanced as part of an overall sustainable transport plan for the site. These paths could provide good linkages to, and improvements to, existing public transport facilities on the A38 and A40 for commuting into the city thus reducing the need to travel by high carbon modes of transport. This should be secured through Policies SD5, INF1 and INF2 which require passenger transport links, safe and convenient pedestrian and cycle routes within and adjoining the development. The urban extension here provides good opportunities to link from the rest of the city and to the wider countryside. Given the size of the allocation and although there are no known traffic and transport issues, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However mitigation is offered in Policy INF2.		+ + ?
9	WASTE AND POLLUTION	Given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional households and businesses generating waste day to day. Mitigation has been put in place in the		-

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		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		
	Minimise pollution and waste to landfill	long-term only through the requirement to submit a waste minimization statement under Policy SD4. Air, light and noise pollution are likely to increase – particularly during the construction phases in the shorter term. This may affect the residential areas to the South East and East of the proposed strategic site. Mitigation is provided by Policy SD15.		
10	THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The provision of 9.1 ha of employment land, especially in a location close to good access, transport, housing and close proximity to existing/proposed employment areas, will have major positive effects on objectives for economic sustainability.		++
11	CITY AND TOWN CENTRES	The urban extension approach with a strategic site providing both housing and employment land at the edge of the city (within 3.2 km) with good transport into the centre will support the vitality and viability of the city centre with major positive effects.		++

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	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		
Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations			
12 SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	The allocation could reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective numbers 8 Transport 14 Health and 15 Housing). The urban extension approach provides a scale at which high quality design and accessibility for all should be more deliverable and certain. In addition, under Policy SA1, development at the site will need to consider whether it could accommodate Gypsy, Traveller and Travelling Showpeople in line with the criteria set out in Policy SD14.		++
13 SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. Policy SD5 requires, where appropriate, that new development should demonstrate how a design principle relating to safety and security has been incorporated which is likely to lead to minor positive effects.		+

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14	HEALTH Improve access to health facilities and promote healthy	The opportunities for improved accessibility to green space as part of wider GI network, including footpaths and the Gloucestershire Way, long distance path, will have positive effects on health. The allocation also includes extra care facilities leading to long-term positive effects on health. The potential site includes local primary school and children's centre; sustainability could be enhanced if such facilities could provide other uses, especially for older children/young adults in the evening, and/or local doctor/nurse attendance. The site is not within walking of health care facilities although in the wording of Policy INF5 there is a requirement for the provision of contributions for local infrastructure including facilities and services. Despite local health facilities not being specified, it is assumed that this is a consideration. In addition, Policy SD15 requires a proposal for development at this site must be accompanied by a Health Impact Assessment.	++
15	HOUSING Ensure everyone has access to a decent home that they can afford and meets their needs	Major positive effects for contributing to the locally identified need for housing, including affordable housing and with the potential to provide accommodation for Gypsies, Travellers and/or Travelling Showpeople subject to meet the requirement of Policy SD14. The scale of the allocation should enable a good range of type and tenure with flexibility for changing needs over time with long term cumulative positive effects – details depend on planning brief and masterplanning. It is understood that Policies SD11, SD4, SD12, SD13 and SD5 will ensure that that new housing provide the right mix and type, a large contribution to affordable housing and also the development of high quality sustainable homes. This will have major long-term positive effects on housing.	++

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16	GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	There are 5 footpaths crossing the potential site and linking to the Gloucestershire Way, a long distance route between Tewkesbury and Chepstow. Accessibility will be enhanced through the improvement to the GI network – if implemented through Policy INF4. The potential site includes possibilities for enhancing access from the existing housing to the SE.		
17	EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	The urban extension approach with easy accessibility from the edge to the city centre will support existing educational services. Provision of a primary school is a requirement of the proposals so there will be no adverse effects through overloading capacity of existing schools.		
18	CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	There are no cultural heritage or tourism assets on or adjacent to the site that are likely to be affected, so the effects are likely to be neutral.		

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	Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester
Summary of Key Negative and Positive Effects for Sustainable Development: The allocation is located on a parcel of Land to the north of the City of Gloucester, adjacent to Innsworth. The allocation supports the SA objectives of Climate change adaptation and Transport, with uncertainty of effects on Historic environment and Sustainable communities – safety. There is potential for minor negative effects on the SA objectives of Resources – use and quality and Waste and pollution, given the location of the option on Greenfield land in the green belt, being located in a groundwater drinking water protected area and the scale of the development proposed. Key Negative Effects: - No significant negative environmental effects have been identified. Key Positive Effects: - The allocation is likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Flooding; The Economy; City and town centres; Sustainable communities - equality and well being; Health; Housing; Green Space; and Education and skills. Mitigation, Recommendations and Residual Effects for Plan-making - None.	

Appendix XII: SA of Housing Scenarios 2014

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
- -	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

Housing Options ¹ Appraised through SA (2014)	
Option	Description
B	Partial return to trend
D	Indexation to 2008 projections from 2021
E	Partial return to trend for 25-34s

¹ Cambridge Centre for Housing and Planning Research for GCT 'Alternative Scenarios for the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy' (McDonald, N. and Whitehead, C. March 2014)

SA Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	Options					
		B		D		E	
		Partial return to trend (33,200 dwellings)		Indexation to 2008 rates from 2021 (30,900 dwellings)		Partial return for 25-34s (30,500 dwellings)	
1. BIODIVERSITY Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	All of the options have the potential for major long-term negative effects on biodiversity. The preferred strategy for the distribution of housing is to focus development in the existing urban areas, which will help to reduce the significance of the effect to some extent; however, this is dependent on the precise location of development and sensitivity of receptors. It is considered that there is suitable mitigation provided through JCS policies and available at the project level to address significant effects; however, there is still an element of uncertainty until lower level assessments have been carried out. It is possible that Option B will have a greater negative effect on biodiversity compared to the other Options as a slightly higher level of growth is proposed. However, this is dependent on the location of growth and sensitivity of receptors. It is considered unlikely that there would be a significant difference in the nature and significance of the effects between the Options against this SA Objective.	?		?		?	
2. CLIMATE CHANGE MITIGATION Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	This SA Objective relates to the use of fossil fuels and carbon emissions from buildings rather than traffic. It is considered that all new development can provide energy & emissions efficiencies through high standards of sustainable construction ² & operation. All of the Options are likely to have a neutral effect against this SA Objective; however, it is recognised that there is still an element of uncertainty. The slightly higher level of growth proposed in Option B is considered unlikely to result in any significant difference in the nature and significance of effects compared to the other Options against this SA Objective.	0	?	0	?	0	?
3. CLIMATE CHANGE ADAPTATION Adapt to the consequences of climate change	All new development, people & communities can be made resilient to the effects of extreme weather. Para 99 of the NPPF states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. No significant difference between the options.	0		0		0	

² Planning for Climate Change – guidance for LAs (Planning & Climate Change Coalition, 2012) suggests that all development of 10 or more dwellings should demonstrate design for a low-carbon future

SA Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	Options					
		B		D		E	
		Partial return to trend (33,200 dwellings)		Indexation to 2008 rates from 2021 (30,900 dwellings)		Partial return for 25-34s (30,500 dwellings)	
4. FLOODING Manage and reduce flood risk and surface water run-off	It is considered that there is suitable mitigation provided through JCS policies and available at the project level to ensure that there are no significant negative effects against this SA Objective. In accordance with the NPPF, Policy INF3 (Flood Risk Management) ensures that proposed development avoids areas of high flood risk and does not contribute to increased flood risk elsewhere. Neutral effect against this SA Objective. No significant difference between the options.	0		0		0	
5. NATURAL ENVIRONMENT AND RESOURCES: QUALITY Protect and improve the quality of natural resources including soil, water and landscape	All of the Options have the potential for major long-term negative effects on landscape through the provision of over 30,000 dwellings during the life of the plan. The strategy to direct development towards existing urban areas will help to protect the rural landscape to a certain extent. It is considered that there is sufficient mitigation provided through JCS policies and available at the project level to address significant effects with the potential for residual minor long-term negative effects. Given the slightly higher level of growth it is possible that Option B could have a greater negative effect on landscape compared to Options D and E; however, this difference is not considered to be significant.	-	?	-	?	-	?
6. NATURAL ENVIRONMENT AND RESOURCES: USE Minimise the use of natural resources including soil, water and greenfield land through good design	All of the Options have the potential for major long-term negative effects on this SA Objective through the loss of greenfield and agricultural land. The strategy to direct development towards existing urban areas will help to protect greenfield and agricultural land to a certain extent. It is considered that there is sufficient mitigation provided through JCS policies and available at the project level to address significant effects with the potential for residual minor long-term negative effects. Given the slightly higher level of growth it is possible that Option B could have a greater negative effect on this SA Objective through the loss of greenfield and agricultural land compared to Options D and E; however, this difference is not considered to be significant.	-	?	-	?	-	?
7. HISTORIC ENVIRONMENT Protect and enhance the area's distinctive historic	All of the Options have the potential for long-term negative effects on the historic environment; however, the significance of this effect is dependent on the precise location of development and sensitivity of receptors. It is considered that there is suitable mitigation provided through JCS policies and available at the project level mitigation to address significant effects with the potential for residual minor short to long-term negative effects	-	?	-	?	-	?

SA Objective environment	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty remaining. However, there is still an element of uncertainty until lower level assessments have been carried out. Given the slightly higher level of growth it is possible that Option B could have a greater negative effect on this SA Objective compared to Options D and E; however, this difference is not considered to be significant.	Options					
		B		D		E	
		Partial return to trend (33,200 dwellings)		Indexation to 2008 rates from 2021 (30,900 dwellings)		Partial return for 25-34s (30,500 dwellings)	
8. SUSTAINABLE TRANSPORT Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	All of the options have the potential for a major long-term positive effect on this SA Objective through improved access to housing and associated employment land and services/ facilities. This along with improvements to and the provision of new sustainable transport modes, including public transport and walking and cycling routes will help to reduce use of the private vehicle. The slightly higher level of growth proposed in Option B is considered unlikely to result in any significant difference in the nature and significance of effects compared to the other Options against this SA Objective.	++		++		++	
9. WASTE AND POLLUTION Minimise pollution and waste to landfill	All of the options are likely to increase pollution and waste in both the short (construction) and long-terms (operation and decommissioning). It is considered that there is sufficient mitigation provided through JCS policies and available at the project level to ensure any significant negative effects are addressed with residual minor long-term negative effects. The slightly higher level of growth proposed in Option B is considered unlikely to result in any significant difference in the nature and significance of effects compared to the other Options against this SA Objective.	0	?	0	?	0	?
10. THE ECONOMY Ensure the availability of employment land and premises to encourage inward investment and support	All of the options have the potential for a minor medium to long-term positive effect on this SA Objective through the provision of over 30,000 dwellings during the life of the plan. The slightly higher level of growth proposed in Option B could have a greater positive effect on the economy compared to the other options; however, the potential difference is not considered to be significant.	+		+		+	

SA Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	Options		
		B	D	E
growth of existing businesses		Partial return to trend (33,200 dwellings)	Indexation to 2008 rates from 2021 (30,900 dwellings)	Partial return for 25-34s (30,500 dwellings)
11. CITY AND TOWN CENTRES Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	The provision of over 30,000 dwellings during the life of the plan in and around the urban areas will help to support the vitality and viability of city and town centres. Potential for all the Options to have a minor long-term positive effect against this SA Objective. The slightly higher level of growth proposed in Option B could have a greater positive effect against this SA Objective compared to the other options; however, the potential difference is not considered to be significant.	+	+	+
12. SUSTAINABLE COMMUNITIES: EQUALITY Reduce inequalities in wellbeing and opportunity	All of the Options have the potential for a minor positive effect on this SA Objective as the provision of housing is likely to help reduce inequality in wellbeing and opportunity across the urban areas. The slightly higher level of growth proposed in Option B could have a greater positive effect against this SA Objective compared to the other options; however, the potential difference is not considered to be significant.	+	+	+
13. SUSTAINABLE COMMUNITIES: SAFETY Reduce crime and the fear of crime	None of the options are likely to have a significant effect against this SA objective. Core Strategy Policy S4 (Design Requirements) seeks new development to contribute to safe communities and reduce the fear of crime.	0	0	0
14. HEALTH Improve access to health facilities and promote healthy lifestyles	All of the options have the potential to provide new health facilities. The potential provision of new facilities and the focus of development in and around urban areas mean that access to facilities that are beneficial to health is likely to improve and with a reduction in health inequalities. It is considered that there are no significant differences in the nature and significance of sustainability effects between Options.	+	+	+
15. HOUSING Ensure everyone has access to a	All of the options will have a major positive long-term effect on this SA Objective. The Supplementary Note on Alternative Scenarios prepared by the Cambridge Centre for Housing and Planning Research in March 2014 states that all of these Options are credible alternatives for	++	++	++

		Options					
		B		D		E	
		Partial return to trend (33,200 dwellings)		Indexation to 2008 rates from 2021 (30,900 dwellings)		Partial return for 25-34s (30,500 dwellings)	
	Assessment of Effects						
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty						
SA Objective decent home that they can afford and meets their needs	meeting the need of the JCS area. There are assumptions made and uncertainties with each of the Options; therefore, it is considered that there are no significant differences in the nature and significance of sustainability effects between Options against this SA Objective.						
16. GREEN SPACE Create, enhance, protect, connect and improve access to open spaces	All of the options have the potential to result in the loss of green space through the provision of housing, although, protection and/ or mitigation is provided by other JCS Policies including INF4, SD15 and S5. Focussing development in the urban areas could lead to the redevelopment of previously developed land which could bring previously inaccessible spaces into public access. Also development on the edge of urban areas through the urban extensions and strategic allocations can increase access to Green Infrastructure and facilitate the connectivity between the countryside and urban areas. Potential for a minor positive effect. It is recognised that there is still an element of uncertainty until lower level assessments have been carried out. It is considered that there are no significant differences in the nature and significance of sustainability effects between Options.	+	?	+	?	+	?
17. EDUCATION AND SKILLS Improve access to education and life-long learning and enhance skills	All of the options have the potential to both increase pressure on existing education facilities as well as provide new facilities. Mitigation is provided by JCS Policy INF5 with regard to increased pressure on existing facilities. The urban focus is more likely to ensure that new development is situated near to existing educational facilities meaning that access is not an issue. Potential for all the Options to have a minor positive effect through improved access to educational facilities. It is considered that there are no significant differences in the nature and significance of sustainability effects between Options.	+		+		+	
18. CULTURE AND TOURISM Protect and enhance cultural heritage and promote tourism	The proposed levels of growth and urban focus all provide opportunities to enhance the established cultural and tourism qualities of the urban areas as well as increase accessibility and the creation of new formal open spaces in new developments. Any negative effects are expected to be mitigated/ prevented by other JCS Policies, including SD9. Therefore the residual effects are considered to be minor positive in the long-term. It is considered that there are no significant differences in the nature and significance of sustainability effects between Options.	+		+		+	