



Sustainability (Integrated) Appraisal (SA), incorporating Strategic Environmental Assessment (SEA)

SA Adoption Statement

November 2017

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Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS) 2031

Sustainability (Integrated) Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), Habitats Regulations Assessment, Health & Equality Impact Assessment: SA Adoption Statement

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This SA Adoption Statement

1. Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development. SA incorporates the requirements for Strategic Environmental Assessment (SEA) and this Sustainability Appraisal/Environmental Statement for the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS) 2031 has been prepared in accordance with the following requirements:
 - Regulation 36 of the Town & Country Planning (Local Development) (England) Regulations 2004
 - Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
 - Paragraph 165 of the National Planning Policy Framework 2012

For the purpose of this Statement that complies with planning and environmental assessment Regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA).

2. The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations¹ and as guided through Government Planning Practice². This SA Adoption Statement satisfies the requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

(a) how environmental considerations have been integrated into the plan or programme;

(b) how the environmental report has been taken into account;

(c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;

(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;

(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

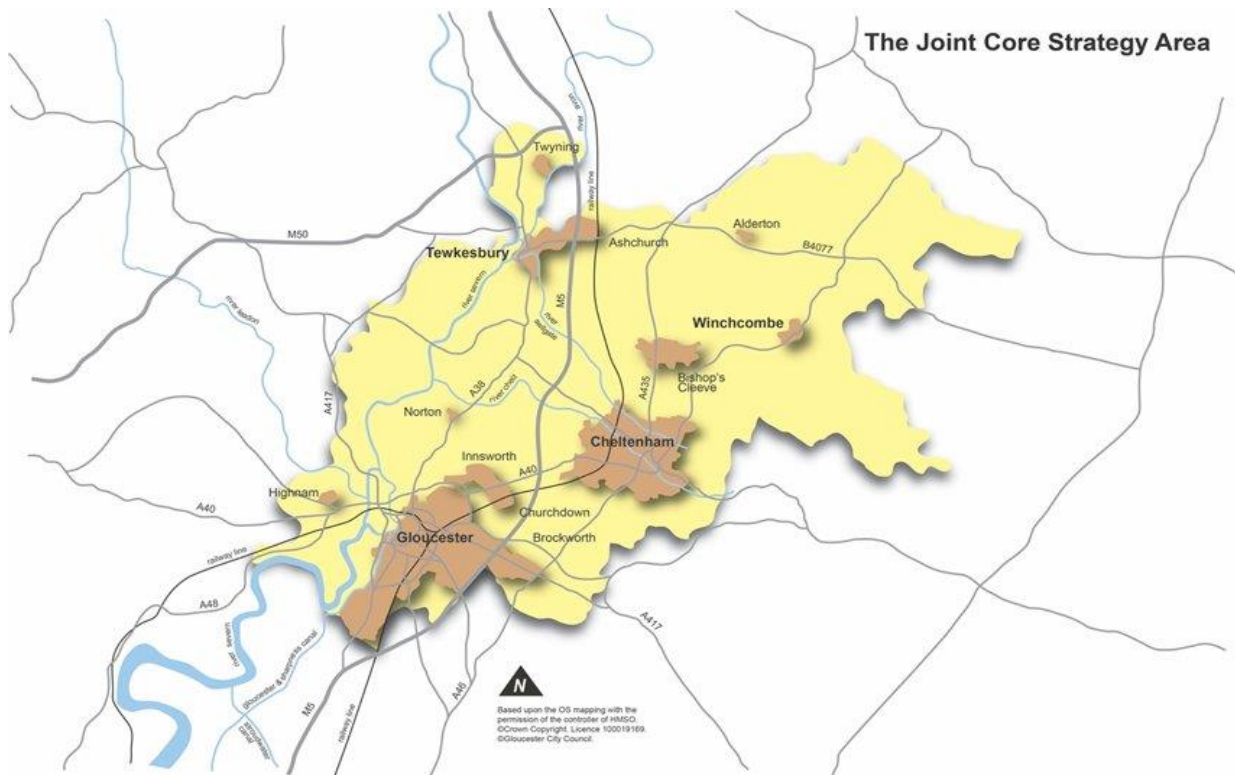
Development of the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy

3. The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council,

¹ <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

supported by Gloucestershire County Council. The partnership was formed to produce a coordinated strategic development plan to show how this area will develop during the period up to 2031. The JCS provides the strategic direction for development in the wider JCS Area; each Council will prepare a Local Plan for non-strategic local development in its own area (and in conformity with the higher level JCS). The JCS is steered by Officers and elected Members from each of the three local authorities, and covers the area as shown in the following mapping³:



4. Considerable work and consultation has been undertaken since 2004-6 (early Joint Study Area studies) and 2007-9 (early JCS studies) to prepare the Joint Core Strategy, including SA/SEA in accordance with the NPPF (2012) and planning practice guidance. Various studies were undertaken to provide the evidence base to inform decision-making, including housing and employment needs; land availability; transport modelling and air quality assessments; retail; green space and recreational studies; landscape and visual sensitivity; Green Belt Review; historic environment; water cycle study and strategic flood risk assessments; infrastructure delivery studies, and assessments of potential strategic site options. The authorities have worked closely with other partners and neighbouring Councils, including Duty to Cooperate and in particular with Stroud and Wychavon Councils. Details of studies undertaken and the evidence underpinning the Joint Core Strategy are provided on the JCS website⁴.

³ <http://www.gct-jcs.org/Mapping/Home.aspx>

⁴ <http://www.gct-jcs.org/PublicConsultation/Gloucester,-Cheltenham-and-Tewkesbury-Joint-Core-Strategy-Examination-Document-Library.aspx> and <http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx>

5. The plan has been developed through an iterative process with comments made through public consultation being taken into consideration at each stage from early JSA studies, issues and key questions, strategic options, draft strategic approach, developing the preferred option, draft JCS, pre-submission JCS, and submission. The JCS was submitted to the Secretary of State for independent Examination in November 2014.
6. There were 3 initial stages to the Examination Hearings (May 2015; July 2015, and January 2016). The Inspector's Interim Report (May 2016)⁵ acknowledged that substantial additional evidence had been submitted and discussions taken place such that proposals for significant amendments to the Pre-Submission JCS should be brought forward. Taking account of updated economic evidence, the Inspector concluded that an Objectively Assessed Housing Need of 33,500 dwellings is appropriate for the JCS area. A policy uplift of 5% making a total housing requirement of 35,175 dwellings was recommended in order to provide more certainty and choice for delivery.
7. The Proposed Modifications are mostly concerned with this uplift in housing requirements and meeting this need through strategic allocations. The Inspector suggested reconsideration of certain strategic options for development location and this was undertaken. Significant reductions in housing numbers resulted for the strategic site South of Cheltenham arising from concerns with regard to high landscape and visual sensitivity; the site was reduced to a capacity that is not strategic and will be addressed through the lower level Cheltenham Local Plan. A strategic site to the north of Gloucester was removed due to concerns about the Green Belt. A previously safeguarded strategic site at West Cheltenham was allocated as an urban extension and a new strategic site to the south-east of Gloucester allocated to help meet the uplift in housing need. A further key change was the reinstatement of site-specific development requirements for each strategic site allocation.
8. The Proposed Modifications to the JCS were subject to public consultation during November-December 2016, the Main Modifications in February-April 2017, and further considered at the resumed Examination in July 2017. The Planning Inspector's Final Report (October 2017) concluded that the Joint Core Strategy is sound, subject to the Main Modifications, and could be Adopted. At each stage of the development of the Joint Core Strategy, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised and responses prepared have been documented during the development of the JCS and published on the Councils' website.
9. The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy up to 2031 comprises the long-term vision and objectives for the area together with strategic policies for shaping and locating new development. The JCS provides the higher level or strategic part of the development plan for the

⁵ <http://www.gct-jcs.org/Documents/Examination-Document-Library-6/EXAM232---JCS-Inspectors-Interim-Findings---31052016.pdf>

area; more detailed, locally specific planning policies and non-strategic site allocations will be set out in the Local Plan for each of the three areas.

10. The JCS sets out the overall Vision and further describes what the vision means for each of the three areas, together with an explanation of the challenges for development planning. There are 9 Strategic Objectives to support and help deliver the vision, categorised according to each of the 3 ambitions – a thriving economy; a sustainable natural, built and historic environment; and a healthy, safe and inclusive community. The Spatial Strategy for the plan sets out the amount of development required and the distribution of new development. There are 15 sustainable development and 8 infrastructure policies to guide development, including protecting the natural and historic environments, and local communities. The Strategic Allocations Policy designates 7 Strategic Allocations on the edges of urban areas where large-scale proposals can use land efficiently; outline boundaries are provided together with site-specific development requirements. The final section of the JCS sets out the framework for monitoring the effectiveness of the JCS, including through the Authorities' Monitoring Reports, with indicators and targets.

How environmental & sustainability considerations have been integrated into the GCT Joint Core Strategy; How the Sustainability/Environmental Report has been taken into account

11. During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Joint Core Strategy. The SA was undertaken in accordance with government guidance^{6 7} for a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. This SA is an integrated approach that includes the findings from the Habitats Regulations Assessment (HRA) and the Equality & Health Impact Assessment (EqIA) – both driven by different legislation and also reported separately. Since 2012, independent specialist consultants were appointed to carry out the SA for the Councils. They worked closely with the plan-making teams in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the JCS.
12. The SA of the JCS used the same SA Framework developed during the SA scoping process as the basis for assessing the emerging plan - and as explained in Section 2 of the submitted SA Report (October 2014). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Decision-Aiding

⁶ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁷ <http://www.pas.gov.uk/guidance>

Questions that seek to resolve the sustainability issues identified and relevant to the plan and the area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.

13. The SA considered the likely significant effects of the implementation of the plan on the sustainability objectives for the Gloucester, Cheltenham & Tewkesbury area. For each aspect of the JCS, the assessment against the SA Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported.
14. The findings and recommendations of the SA informed plan-making and were integrated into the further development of the plan - and as set out in sections 6 - 8 of the Submitted SA Report (October 2014). Where relevant, the SA made recommendations for mitigating likely negative effects, for example, by suggesting refinements of policy wording. In particular, the findings of the SA helped inform the selection of potential strategic site allocations by identifying sustainability issues, likely negative and positive effects. This included identification of sensitive receptors and predicting the likely cumulative effects of proposed development for each authority area and for the JCS area as a whole.
15. The Initial SA Report (2011) made recommendations regarding which broad locations (and parts thereof) would be more sustainable. It also suggested where further detailed studies might be needed to provide more information and reduce uncertainties. As the broad locational areas were further studied for potential strategic allocations and subject to consultation, the SA made suggestions for site-specific wording to mitigate likely negative effects and enhance positive effects. For example, the SA recommended mitigation measures such as protecting mature hedgerows and priority habitats, landscape buffering, Green Infrastructure requirements, equality of access, and the need for further studies including noise impact assessments. A key recommendation at this stage was the suggestion for a separate policy requirement for the historic environment and including setting of assets and consideration of archaeological potential. Most of the suggestions and recommendations from the SA were progressed as the Core, Allocation and Delivery Policies were further developed and refined.
16. During 2013, the options for strategic allocations were further investigated including by SA and refinements made to policy that capture many of the SA recommendations, particularly through site-specific requirements. However, site-specific requirements were removed from the Submission version of the JCS. A number of recommendations from the 2013 SA work were taken into account in the revision of the policies in the Pre-Submission JCS. These included, for example, development that contributes to the vitality and viability of centres in SD3; additional environmental requirements for all major

development in SD4; clarification and strengthening of requirements for biodiversity in SD10; and additional wording to protect water quality in INF3.

17. After the early Examination stages in 2015-16, the Inspector advised an uplift in housing need to reflect updated economic evidence and proposed modifications to the JCS were developed to reflect this increase and to address matters discussed at the Hearings. The proposed changes and Main Modifications to the JCS arising from the Examination and issues discussed at the Hearings were subject to SA, reported, and subject to consultation.
18. The key changes were associated with providing the uplift in housing from 33,500 to 35,175 dwellings through changes to the strategic allocations. The SA considered the reasonable options possible and these were tested through new and refreshed appraisals that were fully reported in the SA Addendum Report (October 2016) that accompanied the Proposed Modifications on consultation. The changes included removal of 2 strategic allocations and inclusion of 2 new allocations, together with reinstatement of site-specific and infrastructure requirements, and updated evidence.
19. Generally, the refreshed SA found that the changes to the JCS confirmed the positive effects that had been identified, particularly for housing and community objectives. The modifications strengthen and confirm implementation of mitigation measures, particularly due to the re-instatement of site-specific and infrastructure requirements that require protection or enhancement of environmental and heritage assets. This improved the overall sustainability of the JCS, including mitigating the negative effects previously identified through the SA, especially with regard to landscape/visual amenity; and transport. It further confirms mitigation and potential enhancement for effects on biodiversity and green infrastructure.
20. The SA reports have been available on the Councils' JCS website and at each stage, the responses to comments made and issues raised have been reported. Throughout, the appraisals have been proportionate and appropriate to the stages of plan-making. Thus, environmental and sustainability considerations have been integrated and the SA Reports taken into account throughout the plan-making process.

How the results of consultation have been taken into account

21. Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the JCS preparation and the SA as follows:

JCS Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Joint Study Area (JSA) studies 2004-6 Public consultation Jan- Feb 2005	Strategic SA (SSA) of JSA area informed SSA of sub-regional area in emerging SW Regional Spatial Strategy (RSS)

	RSS SSA statutory & public consultation Jan 2006
JCS Evidence gathering	SA/SEA Scoping Report Oct 2008 Five weeks statutory & public consultation Final SA/SEA Scoping Report Nov 2009
JCS Issues & Key Questions Public consultation Nov 2009 – Feb 2010	Consultees invited to consider relevant SA objectives for each issue and question. Nov 2009 – February 2010
JCS Strategic Options (addressing climate change, economic resilience, and stronger communities) for overall approach to distributing development in line with RSS; preferred urban focus. Stakeholder consultation Feb-March & July 2010	Comparative SA/SEA summary with symbols for the 3 strategic options set out in Table 7 of Initial SA Report Dec 2011. Public consultation Dec 2011-Feb 2012
JCS Part 1 draft strategic approach (spatial portrait, issues, vision, strategic objectives); Informal on-line public consultation June-Aug 2010	SA compatibility analysis of Strategic Objectives against SA objectives reported in Tables 4 & 5 of Initial SA Report Dec 2011. Public consultation Dec 2011-Feb 2012
JCS Developing the Preferred Option - scenarios A, B, C, D; broad Locations (9 around periphery of Gloucester, 6 in Cheltenham, 6 in Tewkesbury) 3 approaches for next phase (maximising economic, preventing coalescence, best use of existing infrastructure) Public consultation Dec 2011- Feb 2012	Detailed SA undertaken of each Broad Location & Scenarios A-D (4 different quanta of development) summarised in Table 8 (p19 -26) and detailed in Appendix 4 of the Initial SA Report Dec 2011. Public consultation Dec 2011-Feb 2012
Draft JCS – vision, strategic objectives, preferred strategic approach, strategic allocations, strategic, core and delivery policies Public consultation 15 October – 25 November 2013	SA Report (2013) building upon the previous SA work and responses received to previous public consultation. SA of 3 Strategic Options for Distributing Development, options for potential Strategic Allocations, strategic, core and delivery policies, summarised in main report, detailed in Appendices VI - IX. Public consultation 15 October – 25 November 2013
Pre-Submission Draft JCS Public consultation Summer 2014	SA Report Public consultation Summer 2014

Submission JCS Submission to Secretary of State November 2014	Submission SA Report (October 2014) Submission to Secretary of State November 2014
Examination Stage 1 May 2015; Stage 2 July 2015; Stage 3 January 2016	Examination Stage 1 May 2015; Stage 2 July 2015; Stage 3 January 2016
Inspector's Interim Report (May 2016)	
Proposed Main Modifications to JCS Public Consultation 27 February 2017 – 10 April 2017	SA Addendum Report (October 2016) Public Consultation 27 February 2017 – 10 April 2017
Examination Resumed for Proposed Modifications 11-21 July 2017	Examination Resumed for SA of Proposed Modifications 11-21 July 2017
Main Modifications & Consultation comments received considered by Inspector	SA of Main Modifications & comments received considered by Inspector
Adoption of Joint Core Strategy September 2017	SA/SEA Adoption Statement September 2017 (this document)

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

- Appendix V of Submission SA Report (October 2014) summarises comments received and the Councils' for 2011, 2013 & 2014 responses including those made on the SA Scoping consultation
- Appendix B of SA Addendum Report (October 2016) including comments received through Hearing Statements at Examination Stages 1-2 (May & July 2015)

All representations to public consultation and comments made through Hearing Statements for the Examination are available to view on the Councils' website⁸.

23. Issues raised on the Submission SA included queries regarding the selection and assessment of reasonable alternatives, and the significance of some effects predicted for strategic site options. These matters were discussed at the Examination Stages 1 & 2 and addressed through the SA Addendum Report (October 2016).

⁸ <http://www.gct-ics.org/PublicConsultation/> and <http://www.gct-ics.org/Examination/Examination.aspx>

24. Representation on the updated HRA (October 2016) accompanying the Proposed Modifications to the JCS from the environmental regulator Natural England (NE) advised the JCS Authorities of a recent High Court Judgment regarding NE advice on in-combination assessment and air quality from vehicle emissions and nitrogen deposition effects on European sites. This was investigated and a HRA Note⁹ prepared. This concluded that the findings of the strategic HRA reported in 2013, 2015 & 2016 remain relevant and valid; the Submitted and Proposed Modifications to the JCS will not have any adverse effects, either alone or in-combination, on the integrity of the identified European sites.
25. At the resumed Examination Hearings in July 2017, the Inspector requested the implications for the SA of updated transport evidence and a SA Note¹⁰ was prepared. This concluded that the SA findings were not changed. Overall, policies are in place to deliver the mitigation that will reduce the likely negative effects of new development on SA objectives for transport and air quality.
26. Thus, the results of consultation have been taken into account at each stage of plan-making and SA/SEA – in an iterative and ongoing way – responding to issues as they are raised through consultation.

Reasons for choosing the Joint Core Strategy as adopted, in the light of other reasonable alternatives

27. The SEA Regulations require assessment of the likely significant effects of implementing the plan and “*reasonable alternatives*” taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. Extant SA/SEA guidance advises that the term “*reasonable alternative*” should be taken to mean “*realistic and relevant*” i.e. deliverable and within the timescale of the plan.
28. At each stage of the development of the JCS, all strategic options and any reasonable alternatives to policy and site allocation proposals have been considered and assessed through SA/SEA. Options for the Spatial Strategy were considered early at the JCS Issues & Key Questions stage in 2009. During the Developing the JCS Preferred Option reported in 2011, 3 spatial options, 4 scenarios for housing growth, and 21 broad locations for potential strategic allocations were tested through SA. The findings of the SA and the reasons for progressing or rejecting options were set out in Section 6 of the Submission SA Report (October 2014).
29. The do-nothing scenario is not an option for a local plan as Councils are required to provide for identified development needs; however, this was

⁹ <http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/Main-Modifications-Examination-Document-Library/MM27-HRA-Note-14072017.pdf>

¹⁰ <http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/Main-Modifications-Examination-Document-Library/MM36August2017SANoteDS5DS7Transport.pdf>

considered by the SA process and the SA reported that significant negative effects on environmental factors were likely without a plan and that positive effects for socio-economic factors were less likely to be implemented.

30. Reasonable alternatives continued to be identified and further refined during the preparation of the draft JCS in 2012-13. Three strategic options for distributing development were revisited and tested through SA and the emerging strategic allocation options were subject to detailed SA. This is set out in Section 7 of the Submission SA Report and the reasons for progressing or rejecting options are outlined in Table 7.2. Further changes from the Pre-Submission to Submission version of the JCS were considered with regard to alternatives and reasons for progressing or rejecting options are outlined in Table 8.1 of the Submission SA Report. Reasonable alternatives were further considered and subject to SA during the preparation of the Main Modifications; the reasoning for progressed the preferred changes was discussed in the SA Addendum Report (October 2016).
31. Overall, the reasons for choosing the Joint Core Strategy as adopted include that the adopted plan progresses the Vision, Objectives, and Strategy for high quality development planning in the GCT area with the most benefits and the least negative effects for sustainable development. The JCS also sets the appropriate overarching strategic framework for development planning and within which the Local Plans can be developed for Gloucester, Cheltenham and Tewksbury.

Measures that are to be taken to monitor the significant sustainability & environmental effects of the implementation of the Joint Core Strategy

32. The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Authority Monitoring Reports¹¹ on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan. The GCT JCS Monitoring Framework includes a wide range of indicators that also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage, and provide information on the predicted effects from the SA. Monitoring of the GCT JCS will be available to view on the Councils' website.

For further information, please refer to the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy website:

<https://jointcorestrategy.org/>

¹¹ <https://www.gov.uk/guidance/local-plans--2>