

Sustainability Appraisal of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan

Regulation 18 SA

Issues and Options Consultation
(Spatial Options and Key Policy Areas)

December 2023



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan

Regulation 18: Issues and Options (Spatial Options and Key Policy Areas)

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Tewkesbury Strategic and Local Plan Regulation 18 consultation document and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms & abbreviations

ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
BMV	Best and most versatile
BNG	Biodiversity Net Gain
CBC	Cheltenham Borough Council
CGT	Cheltenham, Gloucester and Tewkesbury
DEFRA	Department for Environment, Food and Rural Affairs
DLUHC	Department for Levelling Up, Housing and Communities
DtC	Duty to Co-operate
EqIA	Equality Impact Assessment
EU	European Union
GCC	Gloucester City Council
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
HRA	Habitats Regulations Assessment
MHCLG	Ministry of Housing, Communities and Local Government
NHS	National Health Service
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PPG	Planning Practice Guidance
PRoW	Public Rights of Way
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SLP	Strategic and Local Plan
SPA	Special Protection Area
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
TBC	Tewkesbury Borough Council
WCS	Water Cycle Study

Executive summary

About this report

- E1 Lepus Consulting is conducting an appraisal process for Cheltenham, Gloucester and Tewkesbury Councils (CGT) to help them prepare the Strategic and Local Plan (SLP). The appraisal process is known as Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment (SEA) and Equality Impact Assessment (EqIA), and is prepared during a number of different stages to facilitate iteration between the Plan makers (CGT Councils) and the appraisal team (Lepus Consulting).
- E2 The SEA process seeks to provide high level environmental protection. The different stages of plan making are accompanied by consultation with statutory bodies, other stakeholders and the public.
- E3 SA is the process of informing and influencing the preparation of a local plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the plan.
- E4 The SLP area of Gloucester City, Cheltenham Borough and Tewkesbury Borough is located in the South West of England, in the north of Gloucestershire County, and together comprises approximately 50,000ha.
- E5 The emerging SLP will provide a new strategy for the three authorities (expected to be at least until 2041), taking into consideration the latest changes including the climate change and ecological emergencies.
- E6 At this stage of plan making, the CGT Councils have prepared a draft vision and strategic objectives to guide the emerging SLP, as well as six broad spatial strategy options known as 'development scenarios', to consider how the need for new development could be accommodated in a sustainable way. This is the first Regulation 18 consultation for the SLP and the purpose of this SA Report is to evaluate the likely sustainability effects of the draft vision, objectives, and development scenarios, to help the plan makers in their decision making as the SLP progresses.
- E7 The SLP 'Issues and Options (Spatial Options and Key Policy Areas)' consultation document has been prepared by the CGT Councils and is being consulted on alongside this Regulation 18 SA Report, whereby the public will be asked to give their views on the topics and issues the new plan should cover as it progresses.
- E8 This SA Report has been prepared and published following preparation of the SA Scoping Report in October 2020 (available to download from the SLP website), which identified the

scope and level of detail to be included in the SA process going forward, including defining the SA Framework, which is used to inform the assessment of the likely effects of the SLP at this and future stages of plan making.

Summary findings

E9 Findings from the assessments are presented in a single-line matrix format. The high-level matrix is not a conclusive tool or model. Its main function is to identify at a strategic level whether or not the assessment requires a more detailed examination or whether satisfactory conclusions may be drawn from the high-level assessment without the need for further detailed analysis of a particular proposal.

E10 At this stage, the assessment has focused on the SLP vision and objectives, which set out high-level aspirations for the emerging SLP, and the 'development scenarios' which provide broad directions for new growth within the Plan area that could be pursued.

SLP vision

E11 The proposed SLP vision aims to harness opportunities for green growth across Cheltenham, Gloucester and Tewkesbury to provide thriving, sustainable and healthy places.

E12 The SLP vision performs well across all SA Objectives. It provides strong aspirations for climate change through mitigation technologies and adaptations, focusing on green growth and providing the necessary conditions for a circular economy. In addition, the SLP vision performs well in regard to flood risk, providing aspirations to adopt active flood risk management and establish a strong network of green infrastructure (GI). Furthermore, the provision of GI, and the aim to improve the uptake of active and sustainable travel, has resulted in the SLP vision performing well in terms of human health as well as transport and accessibility. The SLP vision additionally seeks to boost the economy, direct inward investment into key sectors and develop a highly skilled workforce, with likely benefits for both economic and educational growth.

E13 Although positive scores were identified across all SA Objectives, minor rather than major positive impacts were identified against SA Objectives 5 (cultural heritage) and 8 (waste). The SLP vision could be enhanced through incorporating stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, and by making reference to sustainable waste management including minimising the generation of waste and supporting the recycling or re-use of materials during both construction and occupation of new development.

SLP Objectives

E14 The CGT Councils have drafted a set of eight strategic objectives for the emerging SLP. The strategic objectives underpin the overarching vision for the SLP, setting out further detail and aspirations for the delivery of sustainable growth:

- Meeting the challenges of climate change (SLP Objective 1);
- Building strong, competitive and sustainable urban and rural economies (SLP Objective 2);
- Ensuring strong and vibrant city and town centres (SLP Objective 3)
- Delivering a wide choice of homes that meet the needs of our communities (SLP Objective 4);
- Delivering well designed, beautiful and safe places (SLP Objective 5);
- Prioritising sustainable transport and active travel (SLP Objective 6);
- Making as much use as possible of brownfield land and conserving and enhancing the natural and historic environments (SLP Objective 7); and
- Promoting healthy and resilient communities (SLP Objective 8).

E15 In general, the SLP objectives perform well across the SA Objectives. In terms of sustainability performance, the objectives deliver a range of major positive, minor positive and negligible effects.

E16 The SLP objectives seek to adopt a proactive approach to climate change mitigation and adaptation, improving flood risk management, encouraging de-carbonisation and supporting a strong GI network. Additionally, the SLP objectives recognise the importance of delivering well-designed communities which incorporate open space and local services to meet the needs of residents, supported by appropriate social and transport infrastructure. These measures are expected to improve health and wellbeing, address social inequalities and ensure development remains in keeping with the local identity, and support the delivery of sustainable growth.

Development Scenarios

E17 At this stage of the plan making process, the CGT Councils have identified six different scenarios for the location of development (commonly referred to as 'spatial options'), intended to explore the relative 'pros' and 'cons' of each, when applied to the SLP area:

- **S1** – Urban Concentration;
- **S2** – Urban Extensions;
- **S3** – Urban Extensions, avoiding the Green Belt;
- **S4** – New Strategic Settlements;
- **S5** – Rural Dispersal; and
- **S6** – Sustainable Transport.

- E18 It should be noted that none of these scenarios could deliver the likely scale of proposed development in the SLP alone and it is likely that a combination will be required to form a realistic spatial strategy. It has not been possible at this stage to frame these scenarios within a specific geographical understanding or provide an indicative quantum of growth. With this in mind, no single best performing option is identified since a combination will almost certainly be necessary to deliver the Plan; the strengths and weaknesses of each option have been evaluated and are presented in terms of performance against individual SA Objectives.
- E19 Overall, **S1** (Urban Concentration) and **S4** (New Strategic Settlements) have been identified to score positively most often, and negatively least often, of the six scenarios across the 14 SA Objectives.
- E20 **S1** (Urban Concentration) has potential to be the best performing in relation to SA Objectives 1, 3, 4 and 7 (climate change, biodiversity, landscape and natural resources) owing to the urban focus and likely use of brownfield land, and consequent protection of open countryside and undeveloped land.
- E21 **S4** (New Strategic Settlements) was identified as the best performing in relation to SA Objectives 6, 9, 10, 13 and 14 (pollution, housing, health, education and the economy) due to this scenario having the greatest potential to deliver cohesive communities with new infrastructure and services located in close proximity to new housing.
- E22 **S6** (Sustainable Transport) performs strongest against SA Objective 12 (transport and accessibility) due to its focus on growth alongside sustainable transport routes. This scenario also performs relatively well in terms of accessibility to social infrastructure, such as schools (SA Objective 13) and employment opportunities (SA Objective 14).
- E23 **S2**, **S3** and **S5** were not identified as the best performing against any SA Objectives, relative to the other three scenarios, although each do have some strengths. **S2** (Urban Extensions) and **S3** (Urban Extensions avoiding the Green Belt) would focus growth in relatively accessible areas close to urban areas, although potential major negative impacts have been identified for **S2** in terms of SA Objectives 4 and 7 (landscape and natural resources) and so **S3** would be preferable in this regard. **S5** (Rural Dispersal) could help to provide a range of housing types and tenures and conserve the viability of smaller scale settlements, however this scenario could lead to a major negative impact on SA Objective 4 (landscape) due to this dispersed development towards potentially sensitive villages and towns.
- E24 The assessments against several SA Objectives are dependent on location and contextual factors: particularly including flood risk, cultural heritage, waste and equality (SA Objectives 2, 5, 8 and 11). It is not possible to fully understand the impacts of development at this stage, or identify best performing options, without further contextual

and locational information. Conclusions about landscape and biodiversity impacts are also somewhat limited without further context and locational information.

- E25 Drawing on the above information and comments received through this consultation, it is recommended that the CGT Councils prepare further spatial options which will distribute the entire housing number across the Plan area once this is defined. These options can then be evaluated through the SA process, alongside any other reasonable alternatives identified at the next plan making stage.

Recommendations

- E26 **Chapter 5** of this SA Report sets out a range of recommendations for the CGT authorities to consider as the SLP is crafted and refined, including recommendations to improve the SLP vision and objectives, as well as consideration of the identification, description and evaluation of reasonable alternatives which will be an important aspect of the SA process going forward.

Next steps

- E27 This Regulation 18 SA Report will be subject to consultation with statutory consultees, stakeholders and the general public, alongside the 'Issues and Options (Spatial Options and Key Policy Areas)' consultation document.
- E28 This report represents the latest stage of the SA process. Any comments received on this report will be carefully considered and used to inform subsequent stages, where appropriate.
- E29 The next stage in the preparation of the SLP is intended to be a 'Preferred Options' consultation in March 2025. This consultation will also be under Regulation 18 and the SA will include an assessment of further reasonable alternatives identified by the Councils and document the process by which the Preferred Options will be identified.
- E30 Following on, at the Regulation 19 stage, preparation of an Environmental Report will begin, also known as a 'sustainability appraisal report' in planning practice guidance (PPG). The Environmental Report will include all the legal requirements set out in Regulation 12 and Schedule 2 of the SEA Regulations, enabling the Councils to meet the legal requirements set out in sections 19 and 39 of the Planning and Compulsory Purchase Act 2004.

1 Introduction

1.1 Background

- 1.1.1 Lepus Consulting has been commissioned by the three authorities of Cheltenham Borough Council (CBC), Gloucester City Council (GCC) and Tewkesbury Borough Council (TBC) to carry out a Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment (SEA) and Equality Impact Assessment (EIA), to support the Cheltenham, Gloucester and Tewkesbury (CGT) authorities in producing their Strategic and Local Plan (SLP).
- 1.1.2 Beginning in 2008, CGT councils have worked together in producing a strategic plan covering their three areas, resulting in the adoption of the Joint Core Strategy (JCS) in 2017. The emerging SLP will provide an updated strategy for the three authority areas, taking into consideration the latest changes including the climate change and ecological emergencies, as well as emerging changes to the planning system.
- 1.1.3 The purpose of SA/SEA is to help guide and influence the decision-making process of the SLP by identifying the likely sustainability effects of reasonable alternatives, options, and proposals.
- 1.1.4 At this stage of plan making, CGT Councils have identified a draft vision and strategic objectives to guide the emerging SLP, as well as six broad options for the location of new development to be delivered through the SLP. The purpose of this Regulation 18 'Issues and Options' SA Report is to evaluate the likely sustainability effects of the draft vision, objectives and spatial options, to help the plan makers in their decision making as the SLP progresses.
- 1.1.5 SA is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The SA outputs throughout the plan making process will help to promote sustainable development by assessing the extent to which the emerging SLP, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.1.6 This SA/SEA document follows on from the SA Scoping Report¹ prepared in October 2020 to inform the assessment process for the emerging Plan (known at the time of writing as the 'JCS Review') which was consulted on with the statutory bodies (Natural England, Historic England and the Environment Agency).

1 Lepus Consulting (2020) Sustainability Appraisal of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Review: SA Scoping Report, October 2020.

1.2 The SLP area

- 1.2.1 Gloucester City, Cheltenham Borough and Tewkesbury Borough together comprise roughly 50,000ha, with a combined population of approximately 346,200 people according to the Office for National Statistics (ONS) Census (2021)². The area to be covered by the SLP is shown in **Figure 1.1**.
- 1.2.2 Gloucester City, Cheltenham Borough and Tewkesbury Borough lie within the north of Gloucestershire County. As presented in **Figure 1.2**, the vast majority of the SLP area is located within the Tewkesbury administrative boundary, being largely a rural area. In contrast, Cheltenham Borough and Gloucester City cover smaller areas and are more densely populated urban areas.
- 1.2.3 Tewkesbury is a rural market town situated at the confluence of the River Severn and the River Avon. Tewkesbury Borough has seen significant population increase by 15.8% from 2011 to 2021, with a population of 94,900³, having a larger population increase than the South West average of 7.8%. The borough covers a large rural area including the settlements of Winchcombe and Bishops Cleeve, in addition to numerous hamlets and villages.
- 1.2.4 Gloucester is a cathedral city and the county city of Gloucestershire. Gloucester is the most populous of the three SLP authorities, with an approximate population of 132,500 people according to the ONS Census 2021⁴. The population in Gloucester's administrative area increased from 2011 by 8.9%, a larger increase than the South West average of 7.8%. The River Severn forms the western boundary of Gloucester City and the M5 lies adjacent to the eastern boundary. Gloucester is heavily urbanised and more densely populated than its surrounding authorities, although the city does contain notable landscape features including scattered parkland, Alney Island and Robinswood Hill.
- 1.2.5 The town of Cheltenham is characterised by its regency architecture, abutting the Cotswolds National Landscape (formally known as Area of Outstanding Natural Beauty, or AONB) to the east and south, and Green Belt land to the west and north. Several villages including Prestbury, Leckhampton and Charlton Kings lie within the borough, forming a continuous suburban area surrounding the tree-lined promenades and regency townscape in the centre.

2 Office for National Statistics (2022). Census 2021. Available at:
<https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000078/> [Date accessed: 24/10/23]

3 Ibid

4 Office for National Statistics (2022). Census 2021. Available at:
<https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000078/> [Date accessed: 24/10/23]

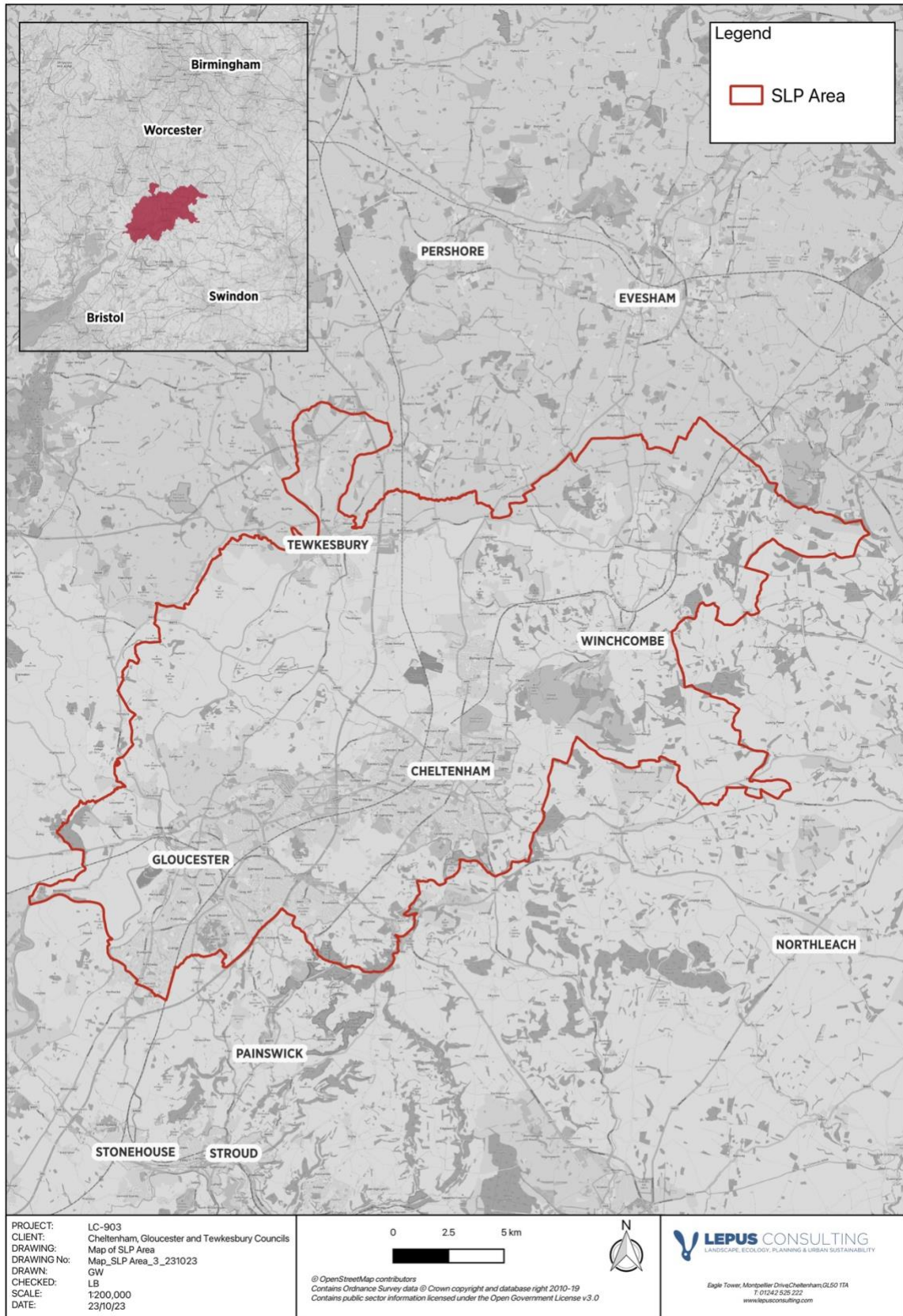


Figure 1.1: The SLP Area

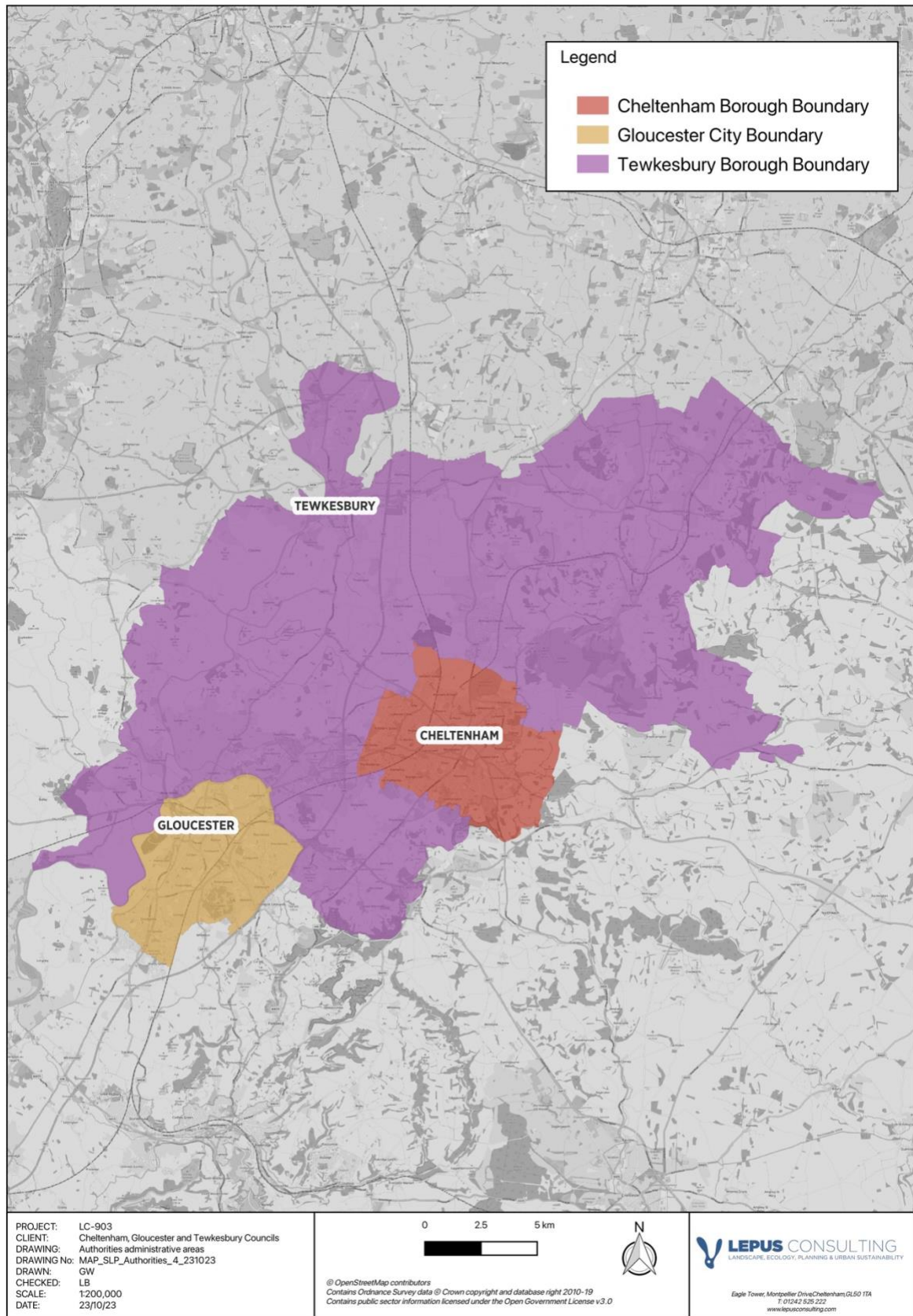


Figure 1.2: Cheltenham, Gloucester and Tewkesbury administrative boundaries

1.3 The Strategic and Local Plan

1.3.1 The SLP will include the overall strategy for development in the CGT area for the Plan period (expected to be at least to 2041), and will seek to:

- Set a clear vision, strategy and policies for how the area will grow;
- Set out requirements for the delivery of new homes, jobs and infrastructure to meet the needs of the community and the local economy in a way that is sustainable and addresses commitments to tackling climate change; and
- Provide a strategic framework for neighbourhood plans, which can be developed by communities.

1.3.2 The SLP is being prepared by the CGT authorities. The SLP will incorporate both strategic policies and 'locality' policies, to ensure that the SLP provides appropriate guidance and addresses issues at both the strategic and locally specific levels.

1.3.3 Once adopted, the SLP will form part of the statutory development plan for the three authorities covering a minimum of 15 years, replacing and updating the currently adopted Joint Core Strategy (JCS) (2011-2031)⁵ (which provided strategic policies for the three authorities) as well as the currently adopted Gloucester City Plan⁶ and any saved policies in the Gloucester City Local Plan (1983)⁷, Cheltenham Plan⁸ and Tewkesbury Borough Plan⁹ (which provided more locally specific policies for each authority area).

1.3.4 The Issues and Options document has been prepared by the CGT Councils, and sets out an overview of the work prepared to date, seeks views on key matters to help further develop the principles and priorities, presents a draft vision and set of strategic objectives for the SLP, and considers six development scenarios to explore how growth could be delivered in a sustainable way.

1.3.5 The consultation engages the community and stakeholders in five key themes, involving the discussion of matters such as:

- What timeframe should the SLP cover? What should the Vision and Strategic Objectives for the area be?
- What policies should be cross-boundary (i.e. cover all three council areas), and which are of local significance?
- How should the SLP respond to climate change and nature recovery?
- How much development should be planned for?

⁵ Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031. Adopted December 2017. Available at: <https://www.jointcorestrategy.org/adopted-joint-core-strategy> [Date accessed: 20/10/23]

⁶ Gloucester City Council (2023) The Gloucester City Plan 2011-2031. Available at: <https://www.gloucester.gov.uk/planning-development/planning-policy/gloucester-city-plan/> [Date accessed: 25/10/23]

⁷ Gloucester City Council (1983) City of Gloucester Local Plan. Available at: <https://www.gloucester.gov.uk/planning-development/planning-policy/adopted-development-plan/> [Date accessed: 06/12/23]

⁸ Cheltenham Borough Council (2020) Cheltenham Plan 2011-2031. Available at: https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan [Date accessed: 25/10/23]

⁹ Tewkesbury Borough Council (2022) Tewkesbury Borough Plan 2011-2031. Available at: <https://tewkesbury.gov.uk/services/planning/planning-policy/adopted-development-plans/> [Date accessed: 25/10/23]

- How could development be delivered in a sustainable way?

1.3.6 The SLP Issues and Options document is being consulted on alongside this SA Report, whereby the public will be asked to give their views on the topics and issues the new plan should cover as it progresses.

1.4 Duty to Cooperate

1.4.1 The Duty to Cooperate (DtC) was created in the Localism Act 2011¹⁰ and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

1.4.2 At later stages of the plan making process, a DtC Statement will be prepared, which will demonstrate how the three authorities have fulfilled this duty.

1.4.3 To date, the CGT Councils have approved the Gloucestershire Statement of Common Ground which includes 37 agreements between the seven Gloucestershire councils on different strategic planning matters.

1.5 Integrated approach to SA and SEA

1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.

1.5.2 The European Union Directive 2001/42/EC¹¹ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows:

1.5.3 *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.

1.5.4 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004¹² (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Local Plan to be subject to SEA throughout its preparation.

10 Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 24/10/23]

11 Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 24/10/23]

12 The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 24/10/23]

1.5.5 SA is a UK-specific procedure used to appraise the impacts and effects of development plans. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004¹³ and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012¹⁴. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

1.5.6 Public consultation is an important aspect of the integrated SA/SEA process.

1.6 Equality Impact Assessment

1.6.1 The aim of the Equality Act (2010)¹⁵ is to strengthen current laws that prevent discrimination. The act applies to the provision of services and public functions and thus includes the development of local authority policies and plans. Equality Impact Assessment (EqIA) aims to improve the work of councils and ensure plans do not discriminate in the way they provide services and employment and do all they can to promote equality.

1.6.2 EqIA is a systematic and evidence-based tool, which enables the SLP to consider the likely impact of work on different groups of people who share a protected characteristic¹⁶, identified in the Equality Act. Completion of EqIAs is a legal requirement under race, disability and gender equality legislation.

1.6.3 EqIA issues will be considered throughout the SA process, through SA Objective 11: Equality.

1.7 Best Practice Guidance

1.7.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Regulations. The approach for carrying out an integrated SA and SEA is based on best practice guidance, including the following:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment¹⁷.

13 Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 23/10/23]

14 The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date accessed: 23/10/23]

15 Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 25/10/23]

16 It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

17 European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 24/10/23]

- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹⁸.
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)¹⁹.
- Ministry of Housing, Communities and Local Government (MHCLG) (2021) Planning Practice Guidance (PPG)²⁰.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans²¹.

1.8 Sustainability Appraisal

1.8.1 This document is a component of the SA of the SLP. It provides an assessment of the emerging SLP vision, Objectives and spatial options, which forms part of Stage B of **Figure 1.2**, according to PPG on SA²².

¹⁸ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf [Date accessed: 24/10/23]

¹⁹ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 24/10/23]

²⁰ DLUHC & MHCLG (2021) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 24/10/23]

²¹ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 24/10/23]

²² DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 24/10/23]

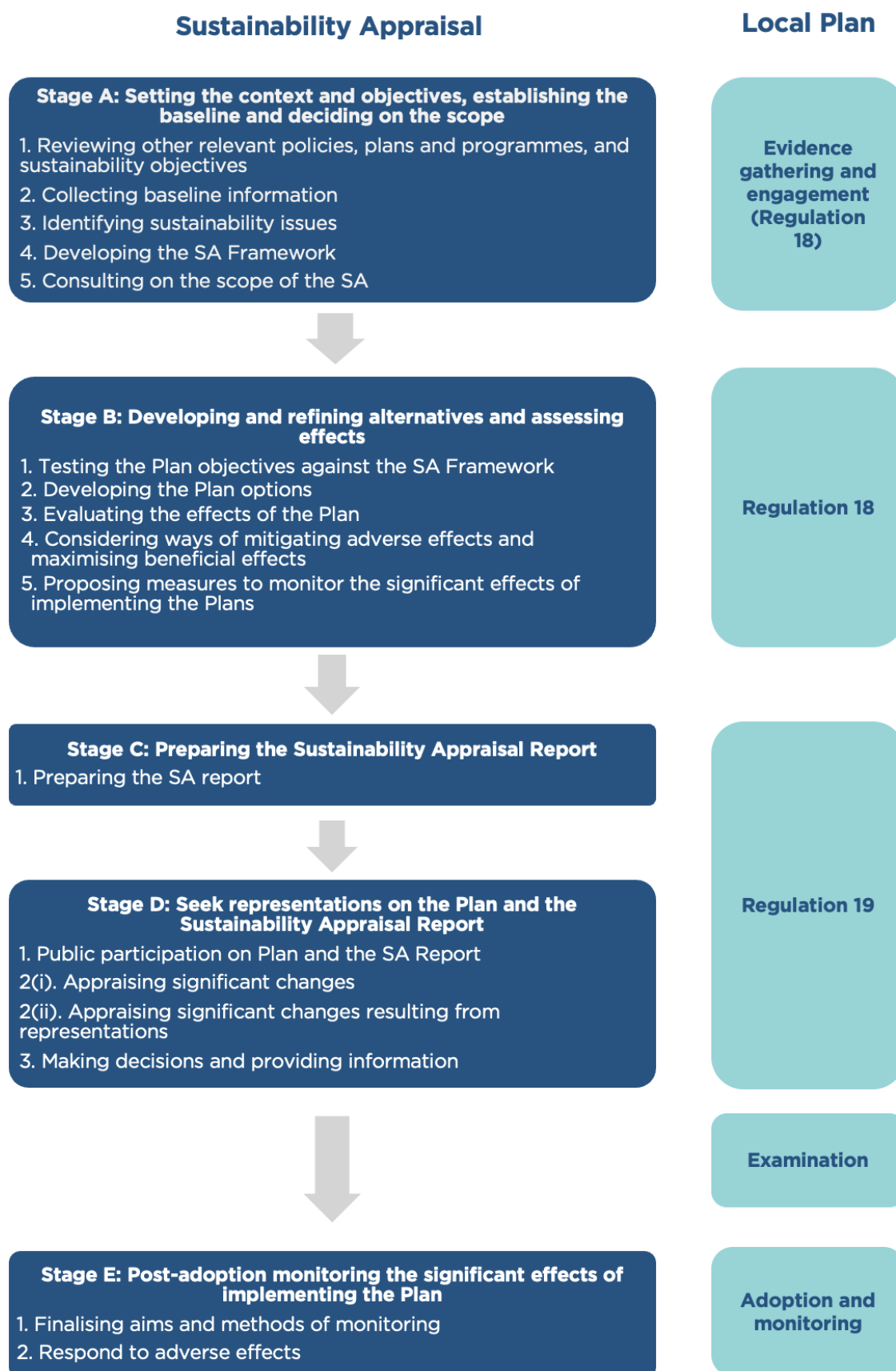


Figure 1.3: Sustainability appraisal process

1.9 The SA process so far

1.9.1 **Table 1.1** below presents a timeline of stages of the SLP and SA process so far. To date, this represents Stages A and B of **Figure 1.2**.

Table 1.1: The SLP and SA process so far

Date	SLP Stage	Sustainability Appraisal
October – December 2020	Evidence gathering; no SLP consultation documents produced at this stage.	SA Scoping Report The Scoping Report identifies the scope and level of detail to be included in the SA.
December 2023 – February 2024	Issues and Options (Spatial Options and Key Policy Areas) (Regulation 18 Consultation) The consultation document sets out an overview of the work prepared to date, seeks views on key matters to help further develop the principles and priorities, presents a draft vision and set of strategic objectives for the SLP and considers six development scenarios to explore how growth could be delivered in a sustainable way.	Regulation 18 SA Report (this report) This report presents an assessment of the SLP vision, objectives and development scenarios presented in the consultation document, and makes recommendations for the emerging SLP.

1.10 Scoping

1.10.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report²³ was prepared in October 2020.

1.10.2 The SA Scoping Report represents Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.10.3 This SA Report does not replicate baseline and contextual information set out in the SA Scoping Report.

1.10.4 The Scoping Report was consulted on between 26th October and 30th November 2020 with the statutory bodies Natural England, Historic England and the Environment Agency. Comments received during the consultation have informed the preparation of this Regulation 18 SA Report. **Table 1.2** summarises the responses received and how these comments have been incorporated into the SA process going forward.

²³ Lepus Consulting (2020) Sustainability Appraisal of the Joint Core Strategy Review: Scoping Report, October 2020.

Table 1.2: Consultation responses from statutory consultees on the SA Scoping Report (October, 2020)

Consultee	Summary of consultation response	Incorporation into the SA
Natural England	<ul style="list-style-type: none"> With regard to the air quality theme we would like to check our understanding regarding the proposed methodology's focus on Air Quality Management Areas (AQMA) and land within 200m of main roads. We would welcome discussion to consider the extent to which these measures are able to respond to considerations such as existing nitrogen deposition exceedances at designated sites in the plan area. With regard to the SAC and Ramsar Site's migratory fish recent local plan making dialogue with the Environment Agency has concluded that these fish should be regarded as present throughout the Severn hydrological catchment subject to obstacles to fish passage. We would welcome discussion over how this functional linkage theme might be reflected when considering European sites during the SA. 	<p>Implications of air quality on designated sites will be addressed within the HRA.</p> <p>SA Objective 3 of the SA Framework has added "<i>including functionally linked land and habitats</i>" under the decision-making criteria.</p>
Historic England	<ul style="list-style-type: none"> SA Objective 5 - Alternatively might this be streamlined to 'Protect and enhance the historic environment' <p>Decision Making Criteria SA Objective 5 SA Framework:</p> <ul style="list-style-type: none"> Protect features of historic interest including their setting and, where necessary, encourage their conservation and renewal? Preserve or enhance archaeological sites and remains? Increase public access to cultural facilities and encourage tourism? <ul style="list-style-type: none"> As the SA Framework sets out how the likely effects of the plan are assessed and measured it is vital the decision making criteria are relevant, robust and accord with legislation and national policy. Unfortunately the first two criteria (above) are inconsistent with the NPPF and the third might be better presented. Could I suggest the following as an alternative? <ul style="list-style-type: none"> Conserve and/or enhance the significance of heritage assets including its setting where this contributes to significance? Respect, maintain and strengthen local character, distinctiveness and sense of place? Sustain and enhance the significance of heritage assets by putting them to viable use, increase public access and/or encourage tourism which are consistent with their conservation. 	<p>SA Objective 5 now reads – "<i>Conserve, enhance and manage the historic environment</i>".</p> <p>Decision making criteria within SA Objective 5 have updated to:</p> <ul style="list-style-type: none"> Conserve and/or enhance the significance of heritage assets including its setting Respect, maintain and strengthen local character, distinctiveness and sense of place Sustain and enhance the significance of heritage assets by putting them to viable use, increasing public access and/or encourage tourism which are consistent with their conservation.
Environment Agency	<ul style="list-style-type: none"> Is a Water Cycle Study (WCS) to be undertaken? The significance of the fact that all the watercourse in the JCS boundary are in hydrological continuity with this protected site is not developed sufficiently throughout the document. The designated fish assemblage of the site is dependent on access to functionally linked habitat outside the boundary of the site and most of the watercourses in the area are relevant for consideration under the Habitats Regulations with respect to the European eel as a minimum. 	<p>The recommendation table for the SLP, Table 5.1, includes recommendations for evidence studies to be prepared including a WCS.</p> <p>SA Objective 3 of the SA Framework has added "<i>including functionally linked land and habitats</i>" under the decision making criteria.</p>

1.11 Signposting for this report

1.11.1 The contents of this SA Report, including the appendix which provides essential contextual information to the main body of the report, are listed below:

- **Chapter 1** (this chapter) sets out the purpose, context and introduction to the SLP and the accompanying SA process.
- **Chapter 2** sets out the assessment methodology and scope of the appraisal.
- **Chapter 3** presents the assessment of the draft vision and eight strategic objectives of the SLP.
- **Chapter 4** presents the assessment of the six spatial options.
- **Chapter 5** sets out a range of recommendations for the CGT Councils to consider as they develop the policies, options and proposals for the emerging SLP.
- **Chapter 6** sets out the conclusions and next steps for the SA.
- **Appendix A** presents the SA Framework.

2 Assessment methodology and scope of appraisal

2.1 Assessment of reasonable alternatives

2.1.1 Each of the elements of the SLP appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of 14 SA Objectives. **Table 2.1** summarises the SA Objectives and their relevance to the SEA themes as per Schedule 2 of the SEA Regulations²⁴.

Table 2.1: Summary of SA Objectives

	SA Objectives	Relevance to SEA Regulations – Schedule 2
1	Climate change: Reduce the CGT authorities' contribution towards the causes of climate change.	Climatic factors
2	Flood risk: Plan for anticipated levels of climate change.	Climatic factors, soil, water
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place	Landscape and cultural heritage
5	Cultural heritage: Conserve, enhance and manage the historic environment	Cultural heritage
6	Pollution: Reduce air, soil, water and noise pollution	Air, water, soil and human health
7	Natural resources: Protect and conserve natural resources.	Soil, water and material assets
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	Population and material assets
9	Housing: Provide affordable, environmentally sound and good quality housing for all.	Population
10	Health: Safeguard and improve community health, safety and wellbeing.	Population and human health
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Climatic factors and material assets

²⁴ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 24/10/23]

	SA Objectives	Relevance to SEA Regulations – Schedule 2
12	Health: Safeguard and improve community health, safety and wellbeing.	Population and human health
13	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population
14	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets

- 2.1.2 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations²⁵. Including the SEA topics in the SA Objectives helps to ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 2.1.3 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision-making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.
- 2.1.4 The purpose of this document is to provide an appraisal of the proposed SLP vision and eight SLP objectives. Additionally, at this stage the CGT Councils have six different scenarios for development, more commonly known as 'spatial options', that will also be appraised within this document.
- 2.1.5 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*
- 2.1.6 Where applicable, this document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 2.1**). Subsequent stages of the SLP process and accompanying SA process are likely to involve further identification, description and evaluation of reasonable alternatives, including information on the likely characteristics of effects.

²⁵ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."

Box 2.1: Schedule 1 of the SEA Regulations²⁶

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, community or international protection status.

2.2 Impact assessment and determination of significance

2.2.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing scenario, the greater will be the significance of effect.

2.3 Sensitivity

2.3.1 Sensitivity is measured through consideration of how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

2.3.2 A guide to the range of scales that will be used in determining impact sensitivity is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

²⁶ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 24/10/23]

Table 2.2: Impact sensitivity

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

2.4 Magnitude

2.4.1 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**).

Table 2.3: Impact magnitude

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> Likely total loss of or major alteration to the receptor in question; Provision of a new receptor/feature; or The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> Frequent and short-term; Frequent and reversible; Long-term (and frequent) and reversible; Long-term and occasional; or Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> Reversible and short-term; Reversible and occasional; or Short-term and occasional.

2.5 Significant effects

2.5.1 In this SA Report, a single value from **Table 2.4** has been allocated to each SA Objective for each aspect of the SLP that has been assessed in line with the scoring system set out in the Scoping Report (2020). Justification for the classification of the impact for each SA Objective is presented in an accompanying narrative assessment text for the SLP vision and objectives. This approach will be used in the assessment of all aspects of the SLP including all reasonable alternatives, options and policies that will be assessed through the SA process going forward.

2.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: “*short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 2.4: Guide to assessing significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<ul style="list-style-type: none"> • The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Mixed Positive and negative Impact +/-	The proposed option has both positive and negative effects on the achievement of the SA Objective
Uncertain ?	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- 2.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle²⁷ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the decision-making criteria of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option or proposal being considered.
- 2.5.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 2.5.5 The level of effect has been categorised as negligible, minor or major. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 2.5.6 In this SA Report, the proposed SLP vision and each draft SLP Objective have been assessed for their likely significant effect against each SA Objective in the SA Framework, as per **Table 3.4**. Likely impacts are not intended to be summed.

2.6 Limitations of predicting effects

- 2.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.6.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Councils and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 2.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. Throughout the SA process, all identified reasonable alternatives, options and proposals will be assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.
- 2.6.4 All data used is secondary data obtained from the Councils or freely available on the Internet.

²⁷ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.

2.7 Methodology for assessment of SLP vision, objectives and development scenarios

2.7.1 The appraisal of the draft SLP vision, objectives and development scenarios, as presented in the Issues and Options consultation document, aims to assess their likely significant effects, based on the criteria set out in the SEA Regulations (see **Box 2.1**).

2.7.2 **Table 2.5** sets out a guide to how likely impacts have been determined in the assessment of options within this report.

Table 2.5: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Mixed Positive and Negative Impact	The proposed option has both positive and negative effects on the achievement of the SA Objective	+/-
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	?
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

2.7.3 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distil the wide-ranging effects into one overall impact.

2.7.4 The appraisal has been prepared with reference to the local context and baseline information as set out in the SA Scoping Report.

2.7.5 As the SA progresses it will use the latest and most available sources of information.

3 Assessment of the SLP vision and objectives

3.1 Preface

- 3.1.1 Local plans should set out a clear vision for the local authority area, which is positive and aspirational but also deliverable. Stemming from the vision, a series of objectives should be established which set out how key issues for the area will be dealt with.
- 3.1.2 Together, the vision and objectives of a local plan should be clear, realistic, locally distinctive and spatial in planning terms, and be based on a sound understanding of the form and function of the Plan area²⁸.
- 3.1.3 The following assessments evaluate the extent to which the proposed draft objectives and options for the vision for the emerging SLP accord with the SA Framework and will help to guide sustainable development.
- 3.1.4 Recommendations to improve the SLP vision and objectives are set out in **Chapter 5**.

3.2 SLP vision

- 3.2.1 The CGT Councils have prepared a draft vision for the SLP area in 2045, as set out in the presented in **Table 3.1**. The vision covers key issues and priorities for the three areas and aligns with national planning policy. The proposed SLP vision aims to harness opportunities for green growth across Cheltenham, Gloucester and Tewkesbury to provide thriving, sustainable and healthy places.

Table 3.1: Draft SLP Vision

Draft SLP Vision

By 2041, and beyond for larger scale developments, the Cheltenham, Gloucester and Tewkesbury area will have harnessed the opportunities of green growth to create thriving, beautiful, energy efficient, resilient and healthy places. Growth will have afforded the highest possible quality of life for all in a manner which achieves carbon reductions and addresses the causes and effects of climate change.

Investment in training, skills and development will have attracted and retained a younger workforce and provided new premises and flexible workspaces to support a flourishing circular economy in both urban and rural areas. Inward investment, innovation and growth in key sectors including, amongst others, cyber and digital-tech, food/agri-tech, advanced engineering and tourism will have been fostered.

People's housing needs will have been met through the provision of sustainable, high- quality market, affordable and other specialist homes set in beautiful, safe places and conforming to sustainable standards of design and construction. The focus will have been on making best possible use of brownfield sites in built up areas and large-scale, comprehensively planned new development to ensure our valuable green spaces and highest quality farmland are preserved. The vital role of the area's city centre, town centres and high streets will have been improved through careful management of development and land uses.

²⁸ PAS (2014) Good Plan Making Guide, Principle 1: Define a locally relevant spatial vision and objectives for the area. Available at: <https://www.local.gov.uk/sites/default/files/documents/entire-guide-4c0.pdf> [Date accessed: 24/10/23]

Draft SLP Vision

Growth in sustainable locations will have enabled the provision of healthy, accessible and walkable neighbourhoods, the promotion of active travel and sustainable travel, and provision of new transport systems that work for local people.

Growth will have been supported by the provision of a range of essential digital, transport, community and other infrastructure. Equally, alongside conserving the area’s special landscapes and its attractiveness as a place to visit, a network of interconnected green spaces and waterways will have secured a high-quality environment for people and nature. Together with necessary retention and management of existing sports and leisure facilities, this will have unlocked opportunities for healthy lifestyles, inclusive access to sport and recreation, active flood risk management and improvements to biodiversity.

The area’s thriving cultural offer will have flourished, and its rich diversity of heritage assets preserved through carefully considered developments and enhancements.

3.2.2 The draft SLP vision has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 3.2**. Explanations and reasonings behind each overall ‘score’ are set out in the following assessment narrative.

Table 3.2: Impact matrix table for the SLP Vision

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Vision	Climate Change	Flood Risk	Biodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Equality	Transport and Accessibility	Education	Economy
SLP vision	++	++	++	++	+	++	++	+	++	++	++	++	++	++

3.2.3 The SLP vision 2045 sets out the aspiration to support green growth and regeneration for the SLP area, covering the CGT administrative areas, meeting the needs of their population and addressing key issues, whilst conserving the natural and historic environment.

3.2.4 The SLP vision seeks to drive climate change adaptation and mitigation technologies, ensuring that the CGT authorities are playing a key role in tackling climate change. The vision seeks to provide the necessary tools and conditions for a circular economy, encouraging green growth. Through encouraging green growth, implementing climate change adaptation and mitigation technologies, and striving for a circular economy, the SLP vision is expected to have a major positive impact on climate change and pollution (SA Objectives 1 and 7) and potentially a minor positive impact on waste production (SA Objective 8).

3.2.5 Through the provision of a network of green spaces, waterway protection, ensuring active flood risk management and seeking improvements in biodiversity, the SLP vision can be expected to have a major positive impact on flood risk and local biodiversity (SA Objectives 1 and 3). Increased coverage and connectivity of ecological networks and GI, supporting the ecosystem services they provide, will also help deliver sustainable development.

- 3.2.6 The protection and management of green spaces and landscapes will help to ensure that the SLP vision provides access to a variety of parks and open spaces, leading to likely benefits on human health. Access to a range of open and green spaces is known to be beneficial for both mental and physical wellbeing. More attractive spaces and increased open space would be likely to encourage more active lifestyles. Overall, the SLP vision could lead to a major positive impact on the local landscape as well as the health and wellbeing of residents (SA Objectives 4 and 10).
- 3.2.7 The SLP vision recognises the importance of the historic environment and seeks to preserve heritage assets through careful development and enhancements. Therefore, a minor positive impact is expected on cultural heritage (SA Objective 5). It is recommended that the SLP vision provides stronger wording on how heritage-related tourism and other development will ensure the settings and significance of any associated cultural heritage assets will be conserved and enhanced. The SLP vision would additionally benefit from using the word 'conserve' rather than 'preserve' to reflect NPPF guidance²⁹.
- 3.2.8 The SLP vision will seek to utilise brownfield land within the area as much as possible, preserving greenfield land and best and most versatile (BMV) soils associated with food production. A major positive impact is expected on natural resources (SA Objective 7).
- 3.2.9 Increased coverage of GI and better management of sport and recreation facilities will provide valuable spaces for community involvement and help encourage social cohesion. More cohesive and vibrant neighbourhoods are likely to contribute towards an improved quality of life, sense of community and local identity. Furthermore, the provision of affordable housing would also ensure improved access to affordable homes. A major positive impact is expected on equality (SA Objective 11).
- 3.2.10 Through the provision of sustainable, affordable, and high-quality homes, the SLP vision seeks to ensure that the housing demands of the population are met. As such, a major positive impact on housing provision would be likely (SA Objective 9).
- 3.2.11 Through the promotion of active travel, underpinned by the provision of a strong transport infrastructure, it is likely that residents will have greater accessibility to sustainable transport methods. Therefore, a major positive impact on transport and accessibility is expected (SA Objective 12).
- 3.2.12 The vision seeks to invest in training, skills and development to retain a younger workforce. The provision of suitable workplaces alongside the investment into skills and training would support the provision of an appropriately skilled workforce. A major positive impact can be expected on education (SA Objective 14).
- 3.2.13 Inward investment into key sectors and the promotion of innovative industries is designed to help to boost the economy. Additionally, the SLP vision focuses on investing into skills and development, which will help to develop a highly skilled workforce. Overall, a major positive impact is expected on the economy (SA Objective 14).

²⁹ DLUHC (2023) National Planning Policy Framework. Available at:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 25/10/23]

3.3 SLP strategic objectives

3.3.1 The CGT councils have drafted a set of eight strategic objectives for the emerging SLP:

- Meeting the challenges of climate change (SLP Objective 1);
- Building strong, competitive and sustainable urban and rural economies (SLP Objective 2);
- Ensuring strong and vibrant city and town centres (SLP Objective 3)
- Delivering a wide choice of homes that meet the needs of our communities (SLP Objective 4);
- Delivering well designed, beautiful and safe places (SLP Objective 5);
- Prioritising sustainable transport and active travel (SLP Objective 6);
- Making as much use as possible of brownfield land and conserving and enhancing the natural and historic environments (SLP Objective 7); and
- Promoting healthy and resilient communities (SLP Objective 8).

3.3.2 The strategic objectives underpin the overarching vision for the SLP, setting out further detail and aspirations for the delivery of sustainable growth. Each SLP Objective is supported by a set of sub-points which state how each will be achieved. The draft SLP objectives are presented in **Table 3.3**.

Table 3.3: Draft Strategic Objectives for the SLP

Draft Strategic Objectives for the SLP

Meeting the challenges of climate change

1. Ensure that growth contributes to decarbonisation through reduced reliance on fossil fuels and achievement of biodiversity net gain; and the delivery of zero and low carbon development that is resilient and adaptable to climate change incorporating measures to aid urban cooling and biodiversity such as green walls and tree planting.
2. Ensuring growth takes place in sustainable locations that minimise the need to travel and provide genuine sustainable transport and active travel options.
3. Making the most effective use of previously developed land, including higher density development in city and town centres and other locations well served by public transport.
4. Ensure development effectively integrates with existing development, and/or is a self-contained development that provides shops, services, facilities through walking, cycling or public transport.
5. Delivers low and zero carbon energy development, making the most effective use of renewable energy opportunities, both in new developments and off-site energy generation.
6. Ensure development is located in areas that are not liable to flooding, considering the implications of climate change, making effective use of sustainable drainage systems and natural flood management techniques. Ensure that existing infrastructure is adequately protected from the threat of flooding, and that existing flood defences and protected and enhanced.
7. Ensure development incorporates measures to reduce waste.
8. Ensure people can make carbon friendly choices at home by providing easy to use cycle storage, covered space to dry washing outside, space to grow food and compost.

Building strong, competitive and sustainable urban and rural economies

1. Providing the right conditions and sufficient land in the right locations to support existing and new businesses and deliver the 'green growth'.
2. Improve the area's economic resilience, supporting a highly skilled workforce, skills and educational development attainment. Providing the right environment for business start-ups, entrepreneurship, and

Draft Strategic Objectives for the SLP

the improvement and expansion of education and training facilities to develop the skills employers need.

3. Supporting the needs of agricultural businesses, encouraging farm diversification, the development of small rural business units, the conversion of existing buildings for rural business use, appropriate expansion of existing businesses.
4. Supporting effective home working through provision of housing with adequate space and services.
5. Developing the area's role as a tourist destination, building on the unique and varied cultural offer that already exists.
6. Ensuring access to high speed, reliable full-fibre broadband connectivity in both urban and rural areas.

Ensuring strong and vibrant city and town centres

1. Ensuring a network of city and town centres that meet the needs of communities, including supporting cultural uses and events, and that are able to respond and evolve as the role and function of centres changes.
2. Support the provision of a wide range of different uses appropriate to city and town centres, including new homes, to create activity at different times of the day and build an active city and town centre community.
3. To draw on the uniqueness of the different centres in planning for their future.

Delivering a wide choice of homes that meet the needs of our communities

1. Delivering sufficient new homes in the right places to meet the needs of our communities, including market and affordable, specialist homes (e.g. older persons), Gypsy, Travellers and Travelling Showpeople and those wishing to build their own homes (self and custom build homes).
2. Delivering housing of the right size, type and tenure to create mixed and balanced communities, in sustainable locations and with good access to shops, services and facilities.

Delivering well designed, beautiful and safe places

1. Supporting the creation of high quality, beautiful and sustainable buildings and places through good design.
2. Ensuring that new development is integrated well with existing communities and providing well-located infrastructure which meets the needs of communities;
3. Creating a strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness.

Prioritising sustainable transport and active travel

1. Reducing the need to travel by creating real options for healthy, accessible and walkable neighbourhoods where key services are available without the need to use motorised transport;
2. Promoting the use of sustainable travel modes by improving existing and providing new frequent public transport links and safe walking and cycling routes in all new developments;
3. Reducing reliance on the private vehicle by improving access to services in rural and urban areas through new development, improved integrated transport links and supporting local and community led transport initiatives in the Local Transport Plan;
4. Creating a genuine choice between different modes of transport by integrating new development with existing networks and enhancing these wherever possible.

Making as much use as possible of brownfield land and conserving and enhancing the natural and historic environments

1. Protecting and enhancing the area's unique historic and cultural environment, archaeological heritage and geological assets whilst enabling appropriate development that facilitates the cross-cutting objectives of sustainable development;

Draft Strategic Objectives for the SLP

2. Conserving, managing and enhancing the area’s unique natural environment and biodiversity, including its waterways, Sites of Special Scientific Interest (SSSI), the Cotswolds National Landscape, and areas of landscape and biodiversity importance, and maximising the opportunities to use land to manage flood water;
3. Ensuring developments support green infrastructure and improve existing green infrastructure within urban and rural areas to provide movement corridors for people and wildlife.

Promoting healthy and resilient communities

1. Delivering new developments that are supported by the necessary social and community infrastructure, including schools, open space, playing fields, community facilities and green and blue infrastructure and promote community cohesion.
2. Supporting and safeguarding village shops that serve the everyday needs of local communities.
3. Delivering new developments that are fully integrated into the green infrastructure network to allow people access to nature and green spaces to maximise wellbeing and active travel opportunities.
4. Ensure new developments create high quality living environments and prioritise health and mental wellbeing.
5. Ensure that all homes have useable functioning amenity space that allows residents the opportunity to live, work and relax outside.

3.3.3 Each draft SLP Objective has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 3.4**. Explanations and reasonings behind each overall ‘score’ are set out in the following assessment narrative.

Table 3.4: *Impact matrix table for the SLP strategic objectives*

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
SLP Objective	Climate Change	Flood Risk	Biodiversity	Landscape	Cultural Heritage	Pollution	Natural Resources	Waste	Housing	Health	Equality	Transport and Accessibility	Education	Economy
1	++	++	+	0	0	++	+	+	0	0	0	++	0	+
2	0	0	0	0	0	0	0	0	0	0	+	0	+	++
3	0	0	0	0	0	0	0	0	+	+	+	0	0	0
4	0	0	0	0	0	0	0	0	++	0	+	+	0	0
5	0	0	0	++	0	0	0	0	0	+	0	+	0	0
6	+	0	0	0	0	+	0	0	0	+	+	++	0	0
7	0	+	++	++	++	0	+	0	0	+	0	0	0	0
8	0	+	+	0	0	0	0	0	0	++	+	+	+	0

SLP Objective 1 – Meeting the challenges of climate change

- 3.3.4 SLP Objective 1 seeks to provide growth that aligns with aims to decarbonise the area. The objective shows the CGT Councils' commitment to reducing contributions towards the causes of climate change and strives for less reliance on fossil fuels, introduction of measures to aid urban cooling and biodiversity, zero-carbon development, encourage carbon friendly lifestyle choices, sustainable transport and growth in areas with access to sustainable transport. These measures can be expected to have a major positive impact on climate change, transport and accessibility, and pollution (SA Objectives 1, 6 and 12) and a minor positive impact on biodiversity and waste (SA Objectives 3 and 8). Furthermore, alongside climate change measures, the adoption of flood management techniques, alongside locating development in areas of low flood risk, are expected to have a major positive impact on flood risk (SA Objective 2).
- 3.3.5 The reuse of previously developed land and concentrating higher density development in town centres would help to preserve greenfield land and additionally boost the local economy by encouraging spending within town centres. Therefore, a minor positive impact on natural resources and the economy is likely (SA Objectives 7 and 14).
- 3.3.6 The objective will help to ensure that development "*integrates with existing development*" which could help to ensure new development is in keeping with local character, leading to a negligible impact on landscape (SA Objective 4). The objective would benefit from stronger wording here, commenting on how development could conserve and enhance the local landscape character, and both retain and strengthen local identity.

SLP Objective 2 - Building strong, competitive and sustainable urban and rural economies

- 3.3.7 SLP Objective 2 supports sustainable growth within urban and rural areas, focusing on ensuring that the area can provide a highly skilled workforce and educational development attainment, support business start-ups, the attractiveness of the area in regard to tourism, and supporting agricultural businesses. Therefore, a major positive impact can be expected on the economy (SA Objective 14), and additionally a minor positive impact on education (SA Objective 13).
- 3.3.8 By ensuring that residents in both rural and urban areas have access to high-speed fibre broadband and that homes provide space and the required services to work from home, the objective is likely to ensure equal opportunities to access services and provide suitable well-designed homes. Therefore, a minor positive impact on equality is expected (SA Objective 11).

SLP Objective 3 – Ensure strong and vibrant city and town centres

- 3.3.9 SLP Objective 3 seeks to ensure that the town centres provide appropriate uses to establish vibrant and active town centres, meeting housing demands whilst creating a space that provides an active centre and town centre community. This is expected to enhance social cohesion within the town centres which would benefit the mental wellbeing of residents. Therefore, a minor positive impact on health and equality can be expected (SA Objective 10 and 11). Additionally, the provision of new homes and suitable uses within the town centre would be likely to provide sustainable access to services owing to their centralised location and make appropriate use of the existing housing stock. Therefore, a minor positive impact on housing is expected (SA Objective 9).

SLP Objective 4- Delivering a wide choice of homes that meet the needs of our communities

- 3.3.10 SLP Objective 4 would help to ensure that housing demands of residents are met. The objective seeks to provide a range of homes that meet the needs of the community, including the provision of affordable homes, specialist homes for the elderly, accommodation for the Gypsy, Traveller and Travelling Showpeople communities, and ensuring that houses are located in sustainable areas that provide sustainable access to local services. By ensuring housing development meets these needs and are of a suitable mix and affordable, a major positive impact is expected on housing provision (SA Objective 9), and a minor positive impact on equality and accessibility to services (SA Objectives 11 and 12).

SLP Objective 5 – Delivering well designed, beautiful and safe places

- 3.3.11 SLP Objective 5 aims to ensure that development is well designed, beautiful, and fitting with the surrounding area, supporting the needs of the communities and enhancing local distinctiveness. This could help to safeguard and strengthen sense of place and protect and enhance the visual amenity of the area. Therefore, a major positive impact on the character and appearance of the landscape is expected (SA Objective 4).
- 3.3.12 Through ensuring high quality design and the protection of the surrounding landscape, outdoor activity and active travel would be encouraged by greater accessibility. Therefore, the objective is expected to have a minor positive impact on the health and wellbeing of residents and on active travel (SA Objectives 10 and 12).

SLP Objective 6 – Prioritising sustainable transport and active travel

- 3.3.13 SLP Objective 6 promotes the use of sustainable transport and active travel choices, ensuring that neighbourhoods are designed to reduce the need to travel by improving accessibility and integrating new development with existing transport networks.
- 3.3.14 The uptake in active modes of transport would encourage a healthier lifestyle and benefit residents' health. Additionally, the reduction in private car use would help to improve air quality by avoiding the generation of further transport-associated air pollution, which could also lead to benefits in terms of reduced greenhouse gas emissions. Providing sustainable transport and increasing accessibility would also reduce inequalities in relation to transport access. Overall, a major positive impact is expected on transport and accessibility (SA Objective 12) and a minor positive impact on climate change, air quality, health, and equality (SA Objectives 1, 6, 10 and 11).

SLP Objective 7 - Making as much use as possible of brownfield land and conserving and enhancing the natural and historic environments

- 3.3.15 SLP Objective 7 seeks to ensure that the natural and historic assets within the area are protected and enhanced, including the surrounding landscape and waterways. The SLP Objective additionally ensures that development provides GI cover to provide movement corridors for people and wildlife and utilise land for flood water management. Therefore, it is expected to have a major positive impact on biodiversity, landscape and cultural heritage (SA Objectives 3, 4, and 5). Additionally, a minor positive impact is expected in terms of flood risk, water resources, and health benefits associated with improved wellbeing from increased GI cover (SA Objectives 2, 7 and 10).

3.3.16 The objective would benefit from stronger wording on brownfield land and how it would be utilised to protect greenfield land within the area and encourage an efficient use of natural resources including soils, and the re-use of contaminated land, given the title of the objective.

SA Objective 8 – Promoting healthy and resilient communities

3.3.17 SLP Objective 8 would help to ensure that the residents in the SLP area are both physically and mentally healthy and that social cohesion is enhanced by providing necessary social and community infrastructure. Under this objective, GI would be provided to ensure that active travel is encouraged. New developments will need to provide functioning amenity space that allows residents the opportunity to live, work and relax outside. The provisions under SLP Objective 8 are expected to have a major positive impact on the health and wellbeing of residents (SA Objective 10).

3.3.18 The provision of social and community infrastructure would help to reduce social inequalities in terms of access to local services, and enhance social cohesion, leading to a minor positive impact on equality (SA Objective 11). Within social and community infrastructure, it is expected that this would include the provision of schools and educational facilities, improving access to schools. Therefore, a minor positive impact on education could be achieved (SA Objective 13).

3.3.19 The provision of GI would provide opportunities for multi-functional benefits including helping to reduce flood risk, increase accessibility and promote active travel, and additionally serve as a corridor for local wildlife. Therefore, a minor positive impact is identified for flood risk, local biodiversity and transport (SA Objective 2, 3 and 12).

4 Assessment of development scenarios

4.1 Preface

- 4.1.1 The spatial strategy will dictate the quantum and location of new homes and area of employment land (and other types of land use where applicable) to be allocated through the SLP over the Plan period.
- 4.1.2 At this stage of the plan making process, the CGT Councils have identified six different scenarios for the location of development to be delivered through the SLP (see **Table 4.1**). The intention of the scenarios is to explore how growth could be delivered in a sustainable way in the SLP area.
- 4.1.3 As noted in the SLP consultation document, *“none of these scenarios would, on their own, deliver sustainable development; the final strategy will be a combination of different elements”*. As such, the six development scenarios at this stage are not reasonable alternatives to the spatial strategy but will help to inform its development over the iterative SA and plan-making process. The relative sustainability credentials of each scenario have been evaluated, with a view to the CGT Councils using this information to identify a preferred strategy in the next Regulation 18 stage.
- 4.1.4 All six scenarios include an assumption that the existing urban capacity of Gloucester and Cheltenham would be included.

Table 4.1: The development scenarios identified by the CGT Councils

Scenario	Description of development scenario (extracted from the consultation document)
1 – Urban Concentration	<p>This option would involve much more intense development than would traditionally be expected on urban sites in Gloucester and Cheltenham, particularly on previously developed land. This would include substantial increases in densities; higher buildings even in more sensitive areas such as Conservation Areas; conversions or rebuilding of retail or other town centre properties into housing or mixed-use schemes.</p> <p>This differs from the baseline position. This means that the number of homes that could fit on the land would be pushed as high as possible.</p>
2 – Urban Extensions	<p>This option would mean seeking to deliver development as urban extensions to the key urban areas of Cheltenham and Gloucester and could include sites which fall within the designated Green Belt. The development strategy of the JCS focused on such extensions as a means of meeting some of the housing needs of Gloucester and Cheltenham. In addition, several areas of land were removed from the Green Belt and “safeguarded” for longer term development needs.</p> <p>Urban extensions may be one of the most effective ways of supporting high quality public transport infrastructure such as the Mass Rapid Transit scheme proposed in Gloucestershire County Council’s Local Transport Plan.</p> <p>Nevertheless, it will need to be demonstrated through the SLP if new urban extensions, including the previously ‘safeguarded’ sites, should form part of the preferred development strategy for our area.</p> <p>As with all options, this includes the urban capacity of Gloucester and Cheltenham as a starting point.</p>
3 – Urban Extensions,	<p>This option means seeking to deliver development as urban extensions to the main settlements in the area but avoiding the Green Belt. This scenario has been identified</p>

Scenario	Description of development scenario (extracted from the consultation document)
avoiding the Green Belt	<p>because the government attaches great importance to Green Belt and the NPPF makes clear that its boundaries should only be altered where exceptional circumstances to do so are fully evidenced and justified through a Local Plan. For this reason, the role of the Green Belt in planning for long-term growth is subject of much national debate.</p> <p>Given the existing Green Belt is concentrated around Gloucester and Cheltenham, and between Cheltenham and Bishops Cleeve, it is appropriate to explore, as part of this consultation, the merits and consequences of a strategy which would support urban extensions to the main urban areas but excluding designated Green Belt land.</p> <p>The inclusion of this scenario is not to say that Green Belt considerations are of any greater significance than protected areas such as the Area of Outstanding Natural Beauty, or Sites of Special Scientific Interest. However, such designations have statutory protection whereas Green Belt land is, as a matter of national policy, designated as a means of managing urban growth, rather than providing environmental protection. This scenario would include land which was previously removed from the Green Belt in the SLP and 'safeguarded' to meet longer term needs. As with all options, this includes the urban capacity of Gloucester and Cheltenham as a starting point</p>
4 – New Strategic Settlements	<p>This option means seeking to deliver development through one or more comprehensive, master-planned new settlements, of a minimum of around 4,000 new homes with supporting infrastructure. Currently, three such potential locations have been identified based on information submitted on behalf of landowners/promoters. The locations are around Boddington on land to the south of the A4109 between the A38 and M5 corridors. A further potential option is presented straddling the boundary of Tewkesbury Borough and the Forest of Dean between Churcham and Highnam in the diagram below. One of the options south west of the SLP area. The third option lies to the east of the M5 at Ashchurch on the edge of the built-up area of Tewkesbury.</p> <p>The latter option – the Tewkesbury Garden Town – was awarded Garden Town status by the Government in 2019. In this context, Tewkesbury Borough Council is currently establishing a programme to work with local people and to plan for a large sustainable new settlement consisting of a wide mix of homes together with the supporting infrastructure required such as schools, health, transport, green infrastructure and other community facilities. Gloucestershire County Council and National Highways are also, as the relevant local highway authorities, drawing up detailed proposals for major improvements to Junction 9 (M5). This would both address existing recognised pressures on the strategic road network as well as potentially provide the additional road capacity necessary to support the development of the proposed Garden Town. The overall planning merits of the proposed Tewkesbury Garden Town will be assessed formally through this SLP process alongside other development options being promoted by others as part of the overall development strategy for the Cheltenham – Tewkesbury – Gloucester area.</p> <p>As with all options, this includes the urban capacity of Gloucester and Cheltenham, as a starting point.</p>
5 – Rural Dispersal	<p>This option means distributing growth widely across the rural area by encouraging development at many existing settlements and potentially other rural locations (such as redundant industrial sites or farm complexes). This would mean the smallest of hamlets and villages could contribute to meeting overall development needs, even where they are not currently recognised in the SLP settlement hierarchy as Rural Service Centres or Service Villages. As with all options, this includes the urban capacity of Gloucester and Cheltenham as a starting point.</p>
6 – Sustainable Transport	<p>This option means delivering development in locations along existing and potential high frequency public transport, walking and cycling routes. It draws on the broad objectives of Gloucestershire County Council as the body responsible for managing road and public transport networks. The Local Transport Plan, in particular, promotes sustainable travel. Development under this scenario would need to be integrated in, or linked to, the Gloucestershire cycle spine and the proposed Gloucestershire Mass Rapid Transport system, which is a longer-term aspiration. Furthermore, all the local authorities in Gloucestershire have agreed a Statement of Shared Intent to in principle to reduce carbon emissions from transport in line with science- based targets to achieve net zero ambitions by 2050.</p> <p>Adopting a sustainable transport strategy as part of the SLP would therefore mean prioritising new sites for housing and economic development in locations which would maximise people's</p>

Scenario	Description of development scenario (extracted from the consultation document)
	choice to travel by means other than the car to success services, facilities and jobs. This would also tend to reduce the need to travel at all and would help reduce carbon emissions. As with all options, this includes the urban capacity within Gloucester and Cheltenham as a starting point.

4.1.5 Each scenario has been assessed for its likely sustainability impacts on each SA Objective in **sections 4.2 to 4.15** below. Best performing options have been identified within each SA Objective in terms of the relative sustainability credentials of each scenario. A summary of the sustainability impacts using the scoring system (as set out in **Chapter 2**) is presented in **Table 4.2** and explained in **section 4.16**.

4.1.6 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the CGT Councils, as well as expert judgement. Limitations of the strategic SA/SEA assessments are noted in **section 2.6**.

4.2 SA Objective 1: Climate Change

4.2.1 **S1** would focus growth in proximity to existing transport infrastructure, and **S6** would likely involve use of existing infrastructure owing to its focus on urban concentration, both of which could potentially minimise construction related traffic and use of materials. **S1** is expected to utilise brownfield sites to the greatest extent with potential for re-use of existing buildings. These locations would also be more likely to be situated near to existing bus and train routes, and potentially walking and cycling routes which could reduce congestion and in turn, traffic-associated greenhouse gas emissions. **S6** would also perform strongly in this regard owing to its focus on growth along sustainable transport corridors. However, increased density in these areas, particularly under **S1**, would increase pressure on GI assets and opportunities for adaptation to climate change may be more limited. Overall, a negligible impact on climate change is identified for both scenarios.

4.2.2 **S2, S3** and **S4** are likely to have mixed effects on climate change. This is due to the balance between the adverse impacts associated with construction of new buildings, alongside the potential to integrate climate change mitigation measures into new development locations in relation to transport infrastructure, potential co-location of homes and services, and design of buildings and open spaces / landscaping. Furthermore, **S2** would utilise some Green Belt land and therefore potentially result in loss of undeveloped land and vegetation which acts as existing areas of carbon storage.

4.2.3 Urban extensions (**S2** and **S3**) and new settlements (**S4**) may have variable levels of connection to transport networks which would need to be assessed on a case-by-case basis.

4.2.4 For a new settlement under **S4**, it is assumed that 'positive' planning for new infrastructure and potential co-location of employment opportunities would be provided, reducing the need to travel and hence this scenario is considered to perform slightly better than **S2** and **S3**. Opportunities for renewable or more efficient district heating schemes could also potentially be enhanced in larger strategic scale developments.

- 4.2.5 Development in rural locations for **S5** is more likely to be situated away from existing sustainable transport options and would result in reliance on private car use and longer travel times. Opportunities for electric vehicle charging may also be more limited. Therefore, whilst it is envisaged rural dispersal will include principles to provide for walking and cycling and accessible local services, seeking to minimise the need for car-based travel, spatial distribution patterns mean that S5 is more likely to result in an overall minor negative impact in relation to climate change.
- 4.2.6 As S1 would likely reduce the need to travel and reduce the need to construct new buildings through utilising previously developed land and brownfield sites, this scenario is expected to perform best, although there are some potential negative impacts associated with retrofitting existing buildings and congestion. **S6** would also be likely to perform well in terms of climate change owing to the focus of growth around sustainable transport infrastructure although there still may be more need to travel under this scenario than for **S1**. However, it is also recognised that **S4** could have a higher potential for positive impacts on climate change mitigation, through providing greener growth and the necessary infrastructure to support sustainable development; despite the scenario expecting to provide new strategic settlements of at least 4,000 homes with likely negative impacts associated with construction.

4.3 SA Objective 2: Flood Risk

- 4.3.1 SA Objective 2 primarily considers the impact that each scenario could have in relation to flood risk, as well as GI coverage across the Plan area. Potential flood risk effects are best assessed at a more refined spatial scale to enable locational and contextual flood risk data to be taken into account. Impacts for each scenario are therefore uncertain at this stage.
- 4.3.2 A number of areas within the urban settlement boundaries (particularly to the west of Tewkesbury and Gloucester, as well as a band throughout central Cheltenham) are located within Flood Zones 2, 3a and 3b, where tidal and fluvial flooding are a key consideration and constraint. In line with NPPF requirements, this limits the potential for regeneration activities in Flood Zone 3b areas and the overall capacity for development within the settlement boundaries. Development potential in Flood Zones 2 and 3a will be informed by the Exception Test. All development scenarios have the potential to increase the impermeable surface area, and all major developments should incorporate Sustainable Drainage Systems (SuDS) to manage surface water run off unless there is clear evidence that this would be inappropriate (in accordance with paragraph 165 of the NPPF 2023).

4.4 SA Objective 3: Biodiversity

- 4.4.1 As a minimum, there should be no net loss to the biodiversity network, the species diversity or habitat diversity. Emerging government policy and legislation on biodiversity net gain (BNG) is likely to see a commitment to at least a 10% gain in biodiversity from January 2024, measured using the biodiversity metric³⁰. Each of the scenarios has the potential to lead to adverse or beneficial effects on biodiversity and a carefully planned strategic approach to mitigation will be essential to effectively deliver BNG.

³⁰ DEFRA and DLUHC (2023) Biodiversity Net Gain moves step closer with timetable set out. Available at: <https://www.gov.uk/government/news/biodiversity-net-gain-moves-step-closer-with-timetable-set->

- 4.4.7 The proposed development of a new settlement under **S4** would involve a substantial area of land (likely greenfield) and could result in significant impacts on biodiversity regardless of location, due to the scale of development and the required supporting infrastructure. In terms of adverse effects on biodiversity, impacts would be focused in one location which could therefore impact on fewer habitats within the SLP area and could lead to lesser adverse effects than **S5** when considering the cumulative loss of land through rural dispersal. **S4** does however have the potential to deliver strategic GI alongside development, and to carefully plan the new settlement around existing ecological corridors and habitats, although the extent to which this may be achieved is uncertain at this stage. The construction of a new settlement is expected to result in the loss of some biodiversity features. However, adhering to BNG principles and a commitment to supporting the Nature Recovery Network could also deliver positive effects in the long term.
- 4.4.8 Overall, **S1** could be identified as the best performing of the scenarios in relation to biodiversity, as it proposes development in areas that would be less likely to serve as priority habitats or corridors for local biodiversity.

4.5 SA Objective 4: Landscape

- 4.5.1 **S1** and **S3** would provide an urban focus for new development which is less likely to result in harm to the Plan area's countryside and rural landscape. These scenarios would avoid additional release of Green Belt land and minimise impacts on the Cotswolds National Landscape and Special Landscape Areas. Development on brownfield land is generally expected to result in lesser adverse impacts than those on greenfield land. Modifying built form where houses or offices already occupy the immediate landscape tends to accommodate change better than new houses in a field with diverse natural features, for example hedges, mature trees, wildflowers, ponds and watercourses. There is also potential under **S1** for small-scale local transformations for landscapes / townscapes that currently lack identity or distinctiveness.
- 4.5.2 However, negative effects could arise including impacts on existing townscapes through an increase in density, loss of existing open space and changes to local landscape character and distinctiveness. Particularly under **S1** which seeks to increase density, the re-use or re-purposing of existing land uses and buildings would need to be carefully considered to reflect the architecture, shape and overall feel for the location that embraces the existing fabric and distinctiveness. **S1** would potentially involve development of tall buildings within urban areas, which would require careful planning to ensure that sensitive landscape features and long-distance views are not adversely affected. Similar challenges may be faced under **S3** in terms of ensuring that urban extensions minimise potential for wider effects on the landscape. Overall, mixed effects are identified for both scenarios.

- 4.5.3 Cheltenham and Gloucester are adjacent to the Cotswolds National Landscape (AONB) to the east; the National Landscape also encompasses smaller settlements and rural areas within Tewkesbury Borough. Each local authority has a statutory duty under the Countryside and Rights of Way Act 2000 (Section 85) to “*have regard to the purpose of conserving and enhancing the natural beauty of the AONB*”³³. Under **S2**, the development of urban extensions to the north of Cheltenham and Gloucester and east of Tewkesbury, whilst located outside of the National Landscape, also have the potential to have an impact upon its setting and special qualities. Cheltenham in particular is constrained by Green Belt land around its boundaries as well as the National Landscape land to the east, which limits the scenarios that can feasibly be considered, along with a distinctive townscape and the contribution that open spaces and historic assets make within its settlement boundaries.
- 4.5.4 Development directed towards the Green Belt under **S2** may also alter existing views of the surrounding countryside and open spaces. Urban extensions, if not appropriately located, could lead to coalescence and loss of distinctive breaks between urban and rural areas. This is a particularly important consideration for land between Gloucester and Cheltenham, and between Cheltenham and Bishop’s Cleeve. Development under **S2** could therefore potentially have a major negative impact on landscape.
- 4.5.5 The construction of a new settlement under **S4** has potential to significantly change existing landscape features and lead to adverse effects in areas of the landscape with lower carrying capacities and higher sensitivity to change. Whilst the Issues and Options SLP document does not identify any specific locations for development, it is possible that adverse effects on visual amenity could be associated with any strategic development within the Plan area including potentially altering distinctive and long-distance countryside views. Although there may be some scope within larger-scale developments to reduce the impact on the wider landscape and important views, **S4** could potentially have a minor negative impact on the landscape overall, although opportunities for some avoiding more sensitive areas are also acknowledged.
- 4.5.6 Under **S5**, development would be dispersed throughout existing settlements, some of which may be within or close to the Cotswolds National Landscape. Development elsewhere in the rural area, especially of a larger scale, could also significantly impact the character, sense of place and local distinctives of the market towns and service villages. Growth within the countryside and rural settlements may degrade landscape quality and result in increased air, noise and light pollution, as well as affecting the perception of tranquillity in these areas. Therefore, a major negative impact has been identified for **S5**, relative to the level of potential housing and employment growth envisaged and recognising the potential for cumulative adverse effects on the landscape.

³³ Countryside and Rights of Way Act 2000. Available at: <https://www.legislation.gov.uk/ukpga/2000/37/contents> [Date accessed: 25/10/23]

4.5.7 **S6** would be likely to have similar impacts to **S1** as locations with close proximity to public transport links are likely to be more urbanised. However, location of development under **S6** does not limit growth to within urban areas and therefore **S6** has greater potential for dispersal of development and consequent adverse impacts on the landscape than **S1**. **S6** has potential for a minor negative impact on SA Objective 4 as it has potential to alter local landscape character, depending on the specific location.

4.6 SA Objective 5: Cultural Heritage

4.6.1 **S1** aims to prioritise an urban focus, and would significantly increase housing density in Gloucester or Cheltenham, although the density per hectare is not known at this stage and would need to be verified as the SLP progresses. A number of important heritage assets can be found within the urban area and **S1** recognises that the proposed development could potentially be within conservation areas or other sensitive areas. Without careful consideration of layout and design principles in such areas, development associated with **S1** could cause adverse impacts on urban heritage assets depending on the specific location and type of development. However, there would be opportunities to ensure development is considerate of the surrounding built form, and potential for sympathetic re-use of existing buildings and heritage-led regeneration, helping to avoid historic buildings falling into disrepair and emphasising the historic character, or replacement of a building that has a potentially detrimental impact on a conservation area. Benefits for heritage could also therefore be associated with this scenario, and all other scenarios to some extent, since all would include the urban capacity of Cheltenham and Gloucester as a starting point. Despite the potential benefits, overall, due to the intense nature of the proposed development in the urban area, **S1** is more likely to lead to a minor negative impact on cultural heritage than the other scenarios.

4.6.2 Urban extensions and associated infrastructure within **S2** and **S3**, rural dispersal of development under **S5** and growth alongside transport infrastructure under **S6** also have the potential to harm heritage assets through direct loss or impacts on their setting, in circumstances where the surrounding countryside and land use relationships contributes to the setting and significance of that asset. One of the purposes of the Green Belt, as defined by the NPPF, is to preserve the setting and special character of historic towns. As such, the proposed development under **S2**, **S5** and **S6** could potentially lead to adverse effects on cultural heritage, although impacts may vary depending on location and the sensitivity of nearby heritage assets and remain uncertain at this stage.

4.6.3 Under **S4** it is uncertain if future development of a new settlement would result in adverse impacts on heritage assets. This assessment can be more appropriately informed when considering locational specifics. A new settlement under **S4** is likely to require a large area of land and would include residential development as well as supporting infrastructure and services. To ensure effective design and layout of this development, detailed masterplanning would be required. There is potential when considering locations that development could be directed away from areas containing a high abundance of heritage assets, although the scale and extent of development in any location means that there is still potential for harm to the significance of designated or non-designated assets, and the archaeological potential would also need to be verified.

- 4.6.4 In order to identify a best performing scenario with regard to cultural heritage, more detail about the location of proposed developments is needed.

4.7 SA Objective 6: Pollution

- 4.7.1 **S1** is expected to result in higher density development in populated areas. The redevelopment of existing buildings would help to reduce the quantity of land being built on and subsequently the volume of materials needed for development, and as such, could help to reduce pollution created during construction. However, there is a general trend of air pollution in higher density urban areas having more adverse impacts on human health than in air pollution in lower density areas³⁴. Development within the urbanised areas of Gloucester City, Tewkesbury and Cheltenham would be more likely to situate residents in areas of higher road transport related air pollution. Some of the core urban areas are covered by AQMAs, and whilst there may be potential opportunities to utilise existing public transport linkages, coupled with planned improvements, overall, a minor negative impact is expected.
- 4.7.2 Under **S2** the location of development is uncertain, but it would potentially direct some development towards the Green Belt. Some parcels within the Green Belt may be situated away from roads and other existing sources of pollution, however, development is likely to increase pollution in these areas including air, noise and light. Under **S3**, the retention of Green Belt can have benefits such as mitigating air pollution, due to the quantity of trees and vegetation typically found in the Green Belt in comparison to the urban centres³⁵. Although development on previously undeveloped land could potentially result in the loss of vegetation, BNG and GI enhancements could help to mitigate this loss to some degree. **S2** and **S3** have potential to direct development towards areas with existing public transport services, or to provide integrated solutions and sustainable transport linkages with the urban areas, secured through the planning process. In contrast, urban extensions could also potentially increase congestion through travel into urban areas and AQMAs, thereby exacerbating local air pollution. Minor adverse effects can therefore not be ruled out under these scenarios.

³⁴ Yuan, C, Ng, Edwards, Norford, Leslie, K. (2014) Improving air quality in high-density cities by understanding the relationship between air pollution dispersion and urban morphologies, *Building and Environment*, V71, pp245-258, January 2014

³⁵ Natural England (2010) Green Belts: a greener future. Available at: <http://publications.naturalengland.org.uk/file/93018>
[Date accessed: 09/02/21]

- 4.7.3 A new settlement under **S4** would likely be located in an area where air quality is generally better than within the urban centres. A new settlement is expected to be accompanied by sustainable transport infrastructure and embed the principle of promoting sustainable travel in the design, providing a range of linked services. Depending on the location, design and transport measures, **S4** could help reduce the need to travel, reliance on private car use and reduce transport-associated air pollution, although adverse impacts on the capacity of existing transport networks in one location and a localised increase in pollution could arise. The scale of the settlement could result in adverse impacts in relation to particulate matter during construction. Overall and on balance, **S4** is considered to perform slightly better than **S1**, **S2** and **S3** but mixed positive and negative effects are likely, dependent on location, transport infrastructure and masterplanning of the sites.
- 4.7.4 **S5** is likely to increase distance travelled compared to other scenarios, and the availability of public transport is likely to be more limited, but development is likely to be located away from existing pockets of poor air quality including AQMAs. Noise and light pollution could also be increased in rural areas under this scenario. A minor adverse effect is anticipated.
- 4.7.5 **S6** is likely to result in higher density development in populated areas as this is generally where the best transport links are located. Although development in close proximity to urban areas and sustainable transport links may limit the generation of air pollution associated with private car use, residents would be exposed to higher levels of transport related emissions by being in close proximity to key transport routes. On balance, despite the potential opportunities associated with utilising existing public transport linkages, a minor adverse impact would be likely.

4.8 SA Objective 7: Natural Resources

- 4.8.1 **S1** promotes an efficient use of land in urban areas, utilising previously developed land to the greatest extent of all the scenarios. This would help to reduce the volume of previously undeveloped land lost to development, and therefore, would protect BMV land and limit the permanent and irreversible losses of agriculturally and ecologically valuable soils. As such, it can be assumed that **S1** would have an overall minor positive effect on this SA Objective. Some pressures on open spaces and important natural resources within urban areas could however be experienced through this scenario, including on water resources.
- 4.8.2 It is assumed that the new development under **S2**, **S4**, **S5** and **S6** would result in the loss of some previously undeveloped land and a negative impact on natural resources to some extent. These scenarios are likely to promote development at lower densities than **S1** which would mean that more land is required to deliver the same amount of growth.
- 4.8.3 **S2** is likely to result in high levels of land-take adjacent to existing urban areas. The extent of effects of this scenario are uncertain as the location of development is unknown, but will likely involve the loss of some Green Belt land. Pockets of ALC Grade 1 and 2 land are present near to the settlement boundaries to the northwest and south of Cheltenham and to north and east of Gloucester which represent some of the Plan area's BMV land.

- 4.8.4 Similarly, for **S4**, this would need to be assessed based on locational characteristics. **S4** aims to develop a new settlement which would be likely to result in a significant loss of greenfield land, although this could potentially include some brownfield land, depending on location. Overall, **S2** and **S4** would be likely to have a major negative impact on natural resources.
- 4.8.5 **S3** promotes extended urban areas whilst protecting the Green Belt, which could provide opportunities for brownfield development in the outskirts of existing settlements. By protecting the Green Belt, **S3** will help to reduce the quantity of undeveloped (and potentially BMV) land being lost to development, although there may still be some smaller-scale loss of undeveloped land associated with development on safeguarded land which was previously removed from the Green Belt. On balance, a negligible impact is expected on SA Objective 7 under **S3**.
- 4.8.6 Under **S5**, development would be dispersed across the Plan area and would likely involve a series of predominantly smaller sites and therefore spread effects across the area. This may also provide some flexibility to locate development on non-BMV land, but may also impact on the loss of farm holdings that contribute to the rural economy and other land use services. A minor adverse effect is anticipated under this scenario, owing to the potential cumulative loss of soil resources.

4.9 SA Objective 8: Waste

- 4.9.1 At the time of writing, there is not sufficient information available to accurately predict the effect that each scenario would have in terms of minimising waste generation, promoting the sustainable management of waste, or encouraging recycling and re-use of waste. It is likely that all scenarios would increase waste generation and place pressure on existing waste management systems, to some extent.

4.10 SA Objective 9: Housing

- 4.10.1 **S1** would seek to locate high density development in the town and city centres and would promote an efficient use of land whilst delivering a high quantum of growth. However, **S1** alone would not be expected to deliver enough housing to meet demand. Paragraph 3.2.8 of the adopted JCS (December 2017) indicated that the urban areas could supply approximately 58% of the identified housing requirement for the adopted JCS and that there was insufficient land inside the existing urban boundaries of Gloucester and Cheltenham, together with commitments within Tewkesbury town, to accommodate their housing and employment needs. It should however be noted that this data relates to information from 2017 for the adopted JCS, and updated urban capacity figures / studies at district level will be needed to draw more reliable conclusions. Nevertheless, these figures suggest that if **S1** was delivered in isolation there would be a likely negative impact in relation to housing as there is insufficient land to provide for housing need within the urban areas. Delivery of affordable housing within the urban areas would however help to provide residents and particularly younger people with access to the housing market in these areas and facilitate the co-location of housing and jobs. Mixed positive and negative effects could therefore be anticipated under **S1**.

- 4.10.2 **S2** would direct development towards urban extensions, some of which would be located within the Green Belt. This could assist in delivering a variety of homes in locations near to the urban edge. Since **S3** seeks to deliver urban extensions but avoids the Green Belt, this scenario will be limited by the availability of land for residential development. Alone, **S2** and **S3** may not be able to meet the identified housing needs across the Plan area, however they will still accommodate a degree of new housing and is expected to have positive effects in relation to potential affordable housing supply and the co-location of jobs and homes. A mix of positive and negative effects is therefore likely for **S2** and **S3**.
- 4.10.3 **S4** would seek to direct development towards a new settlement. Overall, this scenario is likely to have a minor positive impact in relation to housing. **S4** could be identified as the best performing in relation to SA Objective 9, as the development of a new settlement would provide the opportunity to deliver a larger number of new dwellings of a range of types and tenures. However, it should be noted that there is some uncertainty in the impact that this scenario could have in relation to the distribution and affordability of housing across the Plan area as a whole.
- 4.10.4 **S5** focuses on delivering housing in rural areas, which would provide flexibility in relation to the range of sites that could feasibly be delivered but may not respond to where housing need and demand is greatest. The scale of allocations that could be delivered in rural areas may be limited by other sustainability considerations e.g., landscape considerations, relative to settlement size. The impact of the development would depend greatly on the scale and distribution of that development. This scenario could however help to address affordability issues in rural areas and in some instances, could increase the long-term sustainability of a settlement by providing opportunities to introduce a greater number of services and facilities within that community. Mixed positive and negative effects could therefore be anticipated under **S5**; it is unlikely that this scenario would deliver the required levels of housing demand in isolation.
- 4.10.5 **S6** focuses on delivering housing in locations along existing and frequent public transport links. Similarly to **S5**, this scenario could therefore provide flexibility in relation to the range of sites that could feasibly be delivered but may not respond to where housing need and demand is greatest in the urban areas. Furthermore, by locating development close to main existing settlements, **S6** would be likely to provide good access to shops, jobs, services and active travel opportunities. However, due to the location of existing transport infrastructure, it is unlikely that housing needs will be met. Mixed positive and negative effects could therefore be anticipated under **S6**.

4.11 SA Objective 10: Health

- 4.11.1 The provision of new housing could present positive effects for the existing and future population in relation to health and wellbeing on the assumption that new development would be likely to make some contribution towards new or improved open spaces as well as potentially health, sport and community facilities and GI. However, adverse impacts could also arise through pressure on existing services, accessibility to services or air quality implications. Lower density development can have benefits to human health, by providing footpaths and cycleways for active travel, space for residential gardens, open spaces for outdoor exercise and adequate indoor residential space. The relative performance of different scenarios will depend on locational characteristics and design, with some broad conclusions able to be inferred at this stage.
- 4.11.2 **S1** will introduce development at high densities, which would likely mean smaller residential units and gardens. This could potentially result in adverse impacts on wellbeing, and could also create more traffic in urban areas which are partly designated as AQMAs. This scenario is more likely to locate residents in areas with good accessibility to existing services and may encourage active travel through walking and cycling routes, reducing reliance on private car use. However, an urban focus for development could also place more pressure on existing health services and could potentially result in over-capacity issues at some facilities, such as GP surgeries. Access to, and use of, green spaces such as playgrounds and sports fields could also be more limited in some parts of urban areas. It should be noted that through careful, innovative and high-quality design and layout techniques there is good scope for avoiding or mitigating adverse impacts caused by higher density development, such as by providing well-resourced and high-capacity amenities³⁶. Overall, a minor negative impact on human health is identified for **S1**.
- 4.11.3 **S2** would be more likely to present beneficial or mixed effects, either by virtue of the location or scale of development, or a combination of both. Under **S2**, development of urban extensions could provide opportunities to embed healthy living principles. These could include GI to support walking and cycling, provision of accessible local services and securing links between new and existing communities to support interaction. However, this scenario could also increase congestion and car travel with nearby urban areas, and loss of countryside in the Green Belt at existing settlement boundaries which could lead to the loss of availability of natural space for outdoor exercise. On balance, **S2** could potentially have a minor negative impact in relation to human health.
- 4.11.4 **S3** is predicted to have a minor negative effect in relation to SA Objective 10 and would perform similarly to **S2**. Whilst urban extensions could provide opportunities to embed healthy living principles such as active travel and community interaction, **S3** is also likely to have significant reliance on private car use as developments will be located in less sustainable locations compared to **S1** and **S6**. Due to the reliance on urban extensions and avoidance of Green Belt under **S3**, there will be more limited opportunities for masterplanning, healthy neighbourhood strategies and community infrastructure which would help both mental and physical health.

³⁶ Wong, K. W. (2010). Designing for high-density living: High rise, high amenity and high design. In E. Ng (Ed.), Designing high density cities for social and environmental sustainability. London: Earthscan

- 4.11.5 The impact of **S4** is highly dependent on locational characteristics and design of a new settlement but has the potential to be the best performing option in relation to human health. This scenario could support co-location of new services, including health facilities, integrated open spaces and local biodiversity improvements with benefits to physical and mental wellbeing. A minor positive effect could be anticipated.
- 4.11.6 Under **S5** economies of scale could present more limited opportunities for deliverable on-site open space or community facilities alongside housing growth. Some positive effects may be anticipated in terms of access to existing open spaces and mental wellbeing and supporting the viability of local services. Development in rural areas may lead to a greater reliance on the private car, and there may be some accessibility issues in relation to access to health services. Given the ageing population, particularly in rural areas, limited access to health services and greater reliance on private car use are important factors to consider. A minor negative effect could be anticipated.
- 4.11.7 **S6** will introduce development along existing sustainable transport routes, and will require development under this scenario to be integrated with or linked to Gloucester's cycle network and the future Mass Rapid Transport System. This scenario is more likely to locate residents in areas with good access to existing services and may encourage active travel through walking and cycling routes, reducing reliance on private car use. However, this scenario is likely to lead to a generally urban focus which could also place more pressure on existing health services and could potentially result in over-capacity issues at some facilities, such as GP surgeries. The focus of growth alongside key transport routes could potentially mean some residents would be located within areas of existing poor air quality with adverse implications for health. Overall, mixed positive and negative effects on human health would be likely under **S6**.

4.12 SA Objective 11: Equality

- 4.12.1 The delivery of new housing has the potential to result in improvements relating to accessibility to key services and facilities, either through transport improvements or the provision of new facilities. However, a lack of investment in access improvement and facilities could lead to greater disparity and social inequalities. It is difficult at this stage to predict likely differences in performance between scenarios. A lack of affordable housing and employment opportunities could increase in inequality and social exclusion in both urban and rural areas.

- 4.12.2 **S1** proposes urban concentration, which offers opportunities for new housing and employment provision and regeneration in the most deprived areas and may also provide access to affordable housing for a variety of groups, including young people. This scenario provides potential for good access to existing healthcare services and community facilities but could place a strain on existing services, and the capacity for new services in urban areas may be limited. An increased density could potentially lead to loss of existing formal / informal open space or community facilities, which could introduce or exacerbate health inequalities. Whilst intensifying development within urban areas will provide residents with optimum access to employment facilities and could provide greater opportunities for affordable housing in urban areas, it could also provide a greater imbalance in the communities across the Plan area by increasing problems of access to affordable housing in the rural settlements. Higher densities could also potentially increase the fear of crime and anti-social behaviour within communities. **S1** would need to be coupled with consideration of employment provision as a net loss in employment floorspace could also impact increase deprivation. Mixed effects could therefore be experienced under this scenario.
- 4.12.3 Under **S2** and **S3** new employment and housing growth would be directed to the urban edge. In general, there could be potential to locate development in proximity to essential services and employment opportunities, and to integrate a level of new infrastructure and open spaces as well as affordable housing. On balance, these scenarios are considered to give rise to a negligible effect overall, but would be dependent on design and the provision of infrastructure.
- 4.12.4 **S4** would introduce a large-scale development in a new settlement and would be envisaged to have positive effects by requiring significant levels of new infrastructure including potentially education and health facilities, which would reduce pressures on existing services / facilities if the new settlement was planned to be 'self-sufficient'. A new settlement could also provide an opportunity to create social cohesion as it would be likely to have its own character and identity and would provide open and recreational space for community activities. However, by focusing development on a single location, it may have a negative effect on the delivery of local facilities, homes and employment opportunities in other areas of the Plan area which could lead to social inequalities and lack of affordable housing in other areas. Concentrating public transport improvement around a central area could also lead to isolation of more outlying communities. Both positive and negative effects could be experienced under this scenario.
- 4.12.5 **S5** could support the delivery of affordable housing within the rural parts of the Plan area and help to combat out-migration of young people to urban areas. Appropriate mitigation would need to be put in place to contribute towards safeguarding and improving existing services and facilities within rural areas. However, dispersing development too thinly across the area could also have implications in terms of the coordination and delivery of such infrastructure. A lack of development may also not help address the current trend of an increasing elderly population which is placing greater demand on health services and facilities in the Plan area. This scenario is also likely to provide greater reliance on private car use in the rural areas, which could lead to social inequalities where use of cars may prove more difficult for low-income families. Both positive and negative effects could be experienced under this scenario.

- 4.12.6 **S6** would direct development to existing transport networks. This would likely lead to opportunities for urban regeneration and potential for new housing and employment provision in the most deprived areas, which could include affordable housing with benefits for a variety of groups, including young people. This scenario provides potential for good accessibility to existing healthcare services and facilities but could place a strain on existing services and the capacity for new services in urban areas may be limited. Whilst intensifying development within urban areas will provide residents with optimum access to employment facilities and could provide greater opportunities for affordable housing in urban areas, it could also provide a greater imbalance in the communities across the Plan area by increasing problems of access to affordable housing in the rural settlements. Higher densities could also potentially increase the fear of crime and anti-social behaviour within local communities. **S6** would need to be coupled with consideration of employment provision as a net loss in employment floorspace could also increase deprivation. Mixed effects could therefore be experienced under this scenario.
- 4.12.7 At present, there is no evidence to suggest that any of the development scenarios would disproportionately affect any of the protected characteristics³⁷ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

4.13 SA Objective 12: Transport and Accessibility

- 4.13.1 Development under **S1** and **S6** offer increased opportunities for travel by means other than private car, owing to **S1**'s urban focus and **S6**'s focus alongside transport infrastructure. Locating development within urban areas would encourage the use of existing sustainable transport modes and would support the co-location of homes and jobs, reducing the need to travel, but both scenarios could also introduce capacity and congestion issues on the existing transport network without careful planning. Opportunities to further enhance walking and cycling infrastructure would also need to be considered in line with the Local Transport Plan; these opportunities would likely be maximised under **S6**. On balance, a minor positive impact for **S1** and a major positive impact for **S6** have been identified.
- 4.13.2 Urban extensions under **S2** and **S3** could provide accessible locations that reduce the need for car-based travel. However, concentrating development on transport corridors with known capacity problems could have implications in terms of increased congestion and pressure on the strategic road network. This would need to be considered alongside carefully planned mitigation and measures to encourage the use of other modes of transport. The overall effect of these scenarios is uncertain.

³⁷ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

- 4.13.3 Under **S4**, careful design of a new settlement could encourage and facilitate active travel, sustainable modes of transport and reduce the need to travel. The provision of employment space and supporting facilities such as schools and health services within a new settlement could reduce the need to travel. A new settlement is likely to require significant transport infrastructure, and depending on the location, could develop effective linkages with the existing network. The location and design would be key, without which there is a risk of significant impacts on the highway network and increasing congestion. A minor positive effect is identified this scenario but there is potential for a major positive effect depending on location and design.
- 4.13.4 **S5** seeks to direct development towards rural areas, where the provision of bus services and the delivery of other modes of travel including cycling, walking and public transport may be more limited, including poor railway access. Dispersing development could also make it difficult to deliver required transport infrastructure to support sustainable development. Electric vehicle networks are also likely to be more challenging in rural locations. Overall, a minor negative effect is anticipated under this scenario.

4.14 SA Objective 13: Education

- 4.14.1 **S1** would direct development towards urban areas of the SLP area, and **S6** would direct development along transport routes including the urban areas, both of which are likely to provide good sustainable access to a range of schools and education opportunities. A minor positive effect is assessed overall, although it should be noted that **S1** could have implications for the capacity of schools within the urban areas and **S6** may perform better by allowing sustainable access to schools over a wider geographic area.
- 4.14.2 **S2** and **S3** could also provide a number of sustainable transport options depending on where urban extensions are located. Information on the capacity of local schools will need to be assessed, and in some locations, expansion of schools or new provision may be needed to support large scale development proposals. These scenarios are expected to have a minor positive impact in relation to education, subject to new capacity being provided where required for new developments, although there is potential for increased need to travel compared to **S1** and potentially poorer access to sustainable travel options than **S6**.
- 4.14.3 **S4** seeks to direct some development to a new settlement. Under this strategy, it is possible that new school provision could be integrated into the new settlement ensuring residents have access to nearby schools within a sustainable distance, which would also help reduce the risk of over-capacity issues at current schools. As a result, this scenario could potentially have a minor positive impact in relation to education and may perform the best out of the options.
- 4.14.4 **S5** aims to direct development to rural areas. Rural communities across the Plan area may be more reliant upon private car use to access educational facilities given the existing distribution of educational facilities across the SLP area being primarily located within urban areas. A minor negative effect is therefore recorded for sustainable access to education under SA Objective 13.

4.15 SA Objective 14: Economy

- 4.15.1 **S1** and **S6** would help Cheltenham, Gloucester and Tewkesbury to grow in order to ensure their long-term viability, recognising the important role which the towns, cities and transport links play in providing jobs in accessible locations. **S1** would direct new housing and employment growth to key centres, allowing for accessibility via sustainable transport options. **S6** may lead to similar effects through focusing growth along key transport routes which would be likely to include a general urban focus. **S1** could help increase employment opportunities by intensifying low density employment areas and maximising under-utilised space. Positive planning in urban areas may also help to support the tourism-based sector. However, there is a risk that there may not be enough land capacity within urban areas to support the required growth, and combined with pressures to convert existing employment land to housing, there could be a net loss of employment opportunities. Mixed effects are therefore recorded under these two scenarios, although **S6** could potentially be stronger in terms of providing sustainable access to employment opportunities.
- 4.15.2 Under **S2** and **S3**, growth would likely be directed in close proximity to existing urban centres which could help to support the vitality of existing centres. **S2** and **S3** offer opportunities for good access between homes and employment where demand is high but the impact on transport infrastructure would need to be considered. On balance, **S2** and **S3** would be likely to have a negligible impact on SA Objective 14. This is due to uncertainty whether there is enough land available at the urban edges (particularly under **S3**) to meet the economic needs of the whole Plan area.
- 4.15.3 A new settlement (**S4**) including employment provision could potentially locate development in the areas of market demand and deliver employment floorspace. One option for a new settlement could include Tewkesbury Garden Town, which could provide a significant amount of employment land, subject to design and other considerations. There is high demand for employment land around Junction 9 of the M5 which also supports existing employment uses such as Tewkesbury Business Park and Ashchurch Business Centre. Therefore, **S4** could potentially provide benefits for the economy and the provision of jobs, subject to deliverability and infrastructure requirements and balance of homes and jobs. If treated in isolation however, focusing growth in one area could lead to adverse impacts for economic growth in other areas. Overall, mixed effects are identified.

- 4.15.4 Dispersing development under **S5** could support opportunities for businesses to form and grow in rural areas, providing benefits for the rural economy and reducing the need for people to travel longer distances for jobs in the urban areas. However, this could mean that jobs are located in places which are not accessible by sustainable transport. Housing development delivered within **S5** would need to be accompanied by employment provision, but rural locations may not attract market investment, and there is a risk that development would be dominated by residential uses. High levels of growth could also lead to loss of rural character and landscape quality which businesses in the Plan area identify as important to growth and employee satisfaction. Concentration on rural development also risks detracting investment from brownfield sites and undermining the regeneration potential in urban areas. However, there is also potential to support agricultural diversification and land-based sectors, along with specialist skills and tourism sectors. Overall, mixed effects are identified for this scenario.
- 4.15.5 It should be noted that it is important to ensure that opportunities for rural growth, diversification, micro-clustering and co-location, live-work potential³⁸ and homeworking are explored within the rural communities as part of sustainable economic growth.

³⁸ In addition, the potential role, to a degree, for 'live-work units' is encapsulated within the NPPF. Although small scale could be suited to creative / rural industries which have linked skills or knowledge networks. NPPF paragraph 81(d) states when producing planning policies, these should "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."

4.16 Conclusions

4.16.1 The assessment findings for each development scenario are summarised in **Table 4.2**.

Table 4.2: Impact matrix table for the six SLP development scenarios

Development Scenario	1 Climate Change	2 Flood Risk	3 Biodiversity	4 Landscape	5 Cultural Heritage	6 Pollution	7 Natural Resources	8 Waste	9 Housing	10 Health	11 Equality	12 Transport and Accessibility	13 Education	14 Economy
1 – Urban Concentration	0	?	+/-	+/-	-	-	+	?	+/-	-	+/-	+	+	+/-
2 – Urban Extensions	+/-	?	+/-	--	?	-	--	?	+/-	-	0	?	+	0
3 – Urban Extensions, avoiding the Green Belt	+/-	?	+/-	+/-	?	-	0	?	+/-	-	0	?	+	0
4 – New Strategic Settlements	+/-	?	+/-	-	?	+/-	--	?	+	+	+/-	+	+	+/-
5 – Rural Dispersal	-	?	+/-	--	?	-	-	?	+/-	-	+/-	-	-	+/-
6 – Sustainable Transport	0	?	+/-	-	?	-	-	?	+/-	+/-	+/-	++	+	+/-

4.16.2 Overall, **S1** (Urban Concentration) and **S4** (New Strategic Settlements) have been identified to score positively most often, and negatively least often, of the six development scenarios across the 14 SA Objectives.

4.16.3 **S1** (Urban Concentration) has potential to be the best performing in relation to SA Objectives 1, 3, 4 and 7 (climate change, biodiversity, landscape and natural resources) owing to the urban focus and likely use of brownfield land, and consequent protection of open countryside and undeveloped land.

4.16.4 **S4** (New Strategic Settlements) was identified as the best performing in relation to SA Objectives 6, 9, 10, 13 and 14 (pollution, housing, health, education and the economy) due to this scenario having the greatest potential to deliver cohesive communities with new infrastructure and services located in close proximity to new housing.

4.16.5 **S6** (Sustainable Transport) performs strongest against SA Objective 12 (transport and accessibility) due to its focus on growth alongside sustainable transport routes. This scenario also performs relatively well in terms of accessibility to social infrastructure, such as schools (SA Objective 13) and employment opportunities (SA Objective 14).

- 4.16.6 **S2, S3** and **S5** were not identified as the best performing against any SA Objectives, relative to the other three scenarios, although each do have some strengths. **S2** (Urban Extensions) and **S3** (Urban Extensions avoiding the Green Belt) would focus growth in relatively accessible areas close to urban areas, although potential major negative impacts have been identified for **S2** in terms of SA Objectives 4 and 7 (landscape and natural resources) and so **S3** would be preferable in this regard. **S5** (Rural Dispersal) could help to provide a range of housing types and tenures and conserve the viability of smaller scale settlements, however this scenario could lead to a major negative impact on SA Objective 4 (landscape) due to this dispersed development towards potentially sensitive villages and towns.
- 4.16.7 The assessments against several SA Objectives are dependent on location and contextual factors: particularly including flood risk, cultural heritage, waste and equality (SA Objectives 2, 5, 8 and 11). It is not possible to fully understand the impacts of development at this stage, or identify best performing options, without further contextual and locational information. Conclusions about landscape and biodiversity impacts are also somewhat limited without further context and locational information.
- 4.16.8 As noted in **section 4.1**, none of these development scenarios could deliver the likely scale of proposed development in the SLP alone and it is likely that a combination will be required. It has not been possible at this stage to frame these scenarios within a specific geographical understanding or provide an indicative quantum of growth. With this in mind, no single best performing option is identified since a combination will almost certainly be necessary to deliver the Plan; the strengths and weaknesses of each scenario have been evaluated and are presented in terms of performance against individual SA Objectives.
- 4.16.9 Drawing on the above information and comments received through this consultation, it is recommended that the CGT Councils prepare further spatial options which will distribute the entire housing number across the Plan area once this is defined. These options can then be evaluated through the SA process, alongside any other reasonable alternatives identified at the next plan making stage.

5 Recommendations

5.1 Overview

- 5.1.1 The SLP Regulation 18 'Issues and Options' document is intended to identify matters to be considered for the emerging SLP, and to garner the views of local communities and stakeholders on issues that matter to them. It does not set out any policies or sites for consideration at this stage.
- 5.1.2 With this in mind, this chapter of the SA sets out a range of recommendations for the CGT authorities to consider as the SLP continues to be crafted and refined, including consideration of the identification, description and evaluation of reasonable alternatives which will be an important aspect of the SA process going forward.
- 5.1.3 **Section 5.2** sets out some recommendations for enhancement of the SLP vision and objectives, following on from the assessments presented in **Chapter 3**.
- 5.1.4 **Table 5.1** presents a range of recommendations and commentary against each SA Objective, including recommendations for CGT Councils to consider in the development of policies for the SLP and the collection of evidence to inform assessments at future stages.

5.2 Recommendations for the SLP vision and objectives

- 5.2.1 As set out in **Chapter 3**, the draft SLP vision and strategic objectives perform well when considered against the SA Framework; a range of major positive, minor positive or negligible impacts have been identified across all SA Objectives.
- 5.2.2 The following recommendations have been identified to further improve the sustainability of the vision and objectives for the SLP:
- The SLP vision could be enhanced through incorporating stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, such as seeking opportunities for heritage-led regeneration and using the word 'conserve' rather than 'preserve' to reflect NPPF guidance³⁹ rather than preserve.
 - The SLP vision does not directly reference waste or recycling, although reference to striving towards a circular economy is made within the SLP vision and some reference to carbon friendly lifestyle choices within SLP Objective 1. Wording could be incorporated to recognise the role that the SLP can play in helping to minimise waste generation and promoting the recycling or re-use of materials during construction and occupation of development.
 - Despite the SLP vision including wording relating to the use of brownfield land, there is weak wording relating to this within the SLP objectives. Therefore, it is recommended that the SLP objectives (particularly SLP Objective 7) make direct reference to the use of brownfield land and how its

39 DLUHC (2023) National Planning Policy Framework. Available at:
<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 25/10/23]

use can be maximised to protect greenfield land within the area and result in an efficient use of natural resources.

- Reference to brownfield land usage within the SLP vision and SLP objectives would also benefit from wording on how it can be used to protect BMV soil in the SLP area, especially as the area has large areas of Grade 3 soils and pockets of Grade 1 and 2⁴⁰.

5.3 General recommendations for the SLP

5.3.1 **Table 4.1** sets out commentary and a range of recommendations for CGT to consider in the preparation of the SLP, in accordance with the topics and questions as set out in the SLP Issues and Options consultation document.

5.3.2 This includes suggestions for policy provisions, supporting evidence, as well as general points for consideration. The recommendations set out are not exhaustive; further recommendations will be made throughout the SA process to help inform the SLP in its preparation.

Table 5.1: SA commentary and recommendations for the SLP

SA Objective	SA Commentary and Recommendations
Climate change	<ul style="list-style-type: none"> • Wherever possible, the SLP should seek to promote and encourage the generation and use of renewable and low-carbon energy and associated infrastructure. CGT authorities should provide a positive strategy to achieve this, whilst also ensuring that any adverse impacts, including cumulative impacts, of potential energy schemes are addressed. • Different approaches to heat decarbonisation and the removal of gas boilers (as advocated under the Future Homes Standard⁴¹), should be promoted through the SLP including consideration of district heating network connections and / or heat pumps. Opportunities to promote Passivhaus buildings⁴² should be considered. • Consideration should be given to retrofitting of existing building stock, including energy efficiency upgrades to historic buildings. • Consideration should be given to adaptive techniques, such as opportunities to incorporate the latest Sustainable Drainage System (SuDS) technologies and passive heating/cooling systems. • The effects of regional climate change projections (e.g. Met Office UKCP projections⁴³) on cross cutting themes such as flood risk, biodiversity, air quality, landscape, heritage and mobilisation of contaminants should be taken into consideration in terms of the inter-relationship of effects and the requirement to assess climate change adaptability of developments. • As part of additional supporting evidence for the SLP, the CGT authorities could consider commissioning a climate change study and calculating / reporting on greenhouse gas emissions in greater detail. This could include use of the

40 MAFF (1988) Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 24/10/23]

41 Available at: <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings> [Date accessed: 24/10/23]

42 Passivhaus Trust. Available at: <https://www.passivhaustrust.org.uk/> [Date accessed: 25/10/23]

43 Met Office UK Climate Projections (UKCP). Available at: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp> [Date accessed: 24/10/23]

SA Objective	SA Commentary and Recommendations
	<p>Greenhouse Gas Accounting Tool⁴⁴. More detailed carbon footprint data for the Plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the Plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the plan.</p>
Flood risk:	<ul style="list-style-type: none"> • Consideration should be given to adaptive techniques, such as opportunities to incorporate the latest Sustainable Drainage System (SuDS) technologies. • Planning policies should recognise the multi-functional benefits of GI including for wildlife, recreation, flood risk mitigation, urban cooling / shading and carbon storage and seek to incorporate GI features alongside 'grey infrastructure' wherever possible. The role of GI in relation to flood risk is particularly important in the SLP area, where significant proportions of land within Tewkesbury Borough in particular resides within Flood Zone 3 and large flooding issues are prevalent along the River Severn.
Biodiversity and geodiversity:	<ul style="list-style-type: none"> • Developers, residents, landowners, and managers of open spaces should be encouraged to adopt a cooperative approach that connects buildings, gardens and public spaces to create a vibrant and diverse network of interconnected species and habitats. • Mandatory 10% BNG is expected to come into force for Town and Country Planning Act developments in January 2024⁴⁵, although the SLP could strive to achieve higher BNG targets, for example in strategic developments. The CGT authorities could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider range of environmental benefits than BNG alone, such as for air quality and flood risk management^{46 47}. • The findings and recommendations of the emerging Habitats Regulations Assessment (HRA) of the SLP should be taken into account and incorporated into the SLP policies. The SLP should acknowledge links to biodiversity assets beyond the Plan area, including hydrological connections and the potential for likely significant effects on the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar and the species it supports. • The SLP should consider measures to help the delivery of the emerging nature recovery network, following on from the nature recovery network map produced by the Gloucestershire Wildlife Trust and accompanying work by the neighboring West of England and Somerset Wildlife Trust⁴⁸.

44 Local Partnerships (2023) Greenhouse Gas Accounting Tool and Waste Emissions Calculator. Available at: <https://localpartnerships.org.uk/greenhouse-gas-accounting-tool/> [Date accessed: 25/10/23]

45 DEFRA, DLUHC & Harrison, T. (2023) Press release: Biodiversity Net Gain moves step closer with timetable set out. Available at: <https://www.gov.uk/government/news/biodiversity-net-gain-moves-step-closer-with-timetable-set-out#:~:text=Under%20the%20updated%20timetable%20set,for%20example%20by%20creating%20new> [Date accessed: 25/10/23]

46 DEFRA (2019) Natural Capital Committee advice to government on net environmental gain. Available at: <https://www.gov.uk/government/publications/natural-capital-committee-advice-to-government-on-net-environmental-gain> [Date accessed: 24/10/23]

47 National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at: <https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/#:~:text=Environmental%20net%20gain%20is%20the,to%20the%20pre%2Ddevelopment%20baseline.&text=Biodiversity%20net%20gain%20is%20a,for%20achieving%20environmental%20net%20gain>. [Date accessed: 25/10/23]

48 Gloucestershire Local Nature Partnership (2021) Nature Recovery Network. Available at: <https://www.gloucestershirenature.org.uk/nature-recovery-network> [Date accessed: 26/10/23]

SA Objective	SA Commentary and Recommendations
Landscape:	<ul style="list-style-type: none"> The SLP should ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools'⁴⁹ government guidance. Implementing locally specific guidance is recommended to support local distinctiveness and tailor the approach to reflect local priorities. In considering design aspirations, the principles of the 2020 'Building Better, Building Beautiful' report⁵⁰ should be embraced. There are three pillars to the approach advocated in this report: <i>"ask for beauty, refuse ugliness and promote stewardship"</i>. The SLP policies should encourage active frontages within town centres and high streets. Improvements to GI coverage within urban areas should also be encouraged, such as through seeking opportunities to design GI into frontages or implement public realm landscaping schemes. This would provide opportunities to improve the quality, character, and appearance of built form, promoting a strong sense of place and encouraging visitors. Changing land uses can help to rejuvenate and modernise landscapes and townscapes and should be supported so long as the design, layout and architecture embraces the existing public realm. The SLP should strive to protect and enhance the special qualities of locally important landscapes, such as Robinswood Hill Country Park and Crickley Hill Country Park, and nationally important landscapes including the Cotswolds National Landscape (AONB) and its setting (Special Landscape Areas). SLP policies should support development in accordance with the AONB Management Plan⁵¹.
Cultural heritage:	<ul style="list-style-type: none"> The SLP should promote innovative re-use of existing building stocks, including developments which would improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering their retention and re-use, versus their replacement. CGT authorities should refer to Historic England's guidance on keeping historic buildings in good repair⁵².
Pollution:	<ul style="list-style-type: none"> The SLP should work towards ensuring that all new residential and commercial developments support the move to zero carbon and avoid the generation of further air pollution. A Water Cycle Study (WCS) is recommended to provide evidence to inform strategic planning with regard to water resources, to help improve water quality and avoid the generation of pollution to watercourses and/or groundwater, especially given the increased number of houses and contemporary climate change issues.
Natural resources:	<ul style="list-style-type: none"> The SLP should support the efficient use of land, seeking appropriate opportunities to remediate degraded or contaminated land, and allocate new development on under-utilised or vacant land. Residential uses in town centres such as above retail areas should be promoted where appropriate, to help reduce the quantity of new land required to meet housing demands and make more efficient use of space, protecting greenfield land in the area.

49 DLUHC & MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 24/10/23]

50 MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf [Date accessed: 24/10/23]

51 Cotswolds Area of Outstanding Natural Beauty Management Plan 2023-2025. Available at: https://www.cotswoldsaonb.org.uk/wp-content/uploads/2023/09/CNL_Management-Plan-2023-25_final.pdf [Date accessed: 24/10/23]

52 Historic England (2023) Stopping the Rot: A guide to enforcement action to save historic buildings. Available at: <https://historicengland.org.uk/images-books/publications/stoppingtherot/> [Date accessed: 24/10/23]

SA Objective	SA Commentary and Recommendations
	<ul style="list-style-type: none"> It is recommended where possible the SLP should clarify if brownfield land will be used for development, especially within the SLP objectives and development scenarios where reference to urban development is made.
Waste:	<ul style="list-style-type: none"> Waste strategies and policies will need to take into account predicted increases in waste as well as the need to manage potentially more diverse waste outputs associated with a range of industrial, commercial and technological growth promoted through the SLP and nationally. The SLP policies should require development proposals to demonstrate measures taken to minimise waste generation during construction. To improve efficiency of waste management during occupation of development, proposals should be encouraged to integrate well-designated waste storage space to facilitate effective waste storage, recycling, and composting. The SLP should take into account the findings of relevant evidence base documents to ensure that waste management and recovery facilities are appropriately located and will facilitate moving waste up the hierarchy to enable communities to take more responsibility for waste arising in their areas.
Housing:	<ul style="list-style-type: none"> Self- and custom-build housing should be encouraged through the SLP to meet local demands, providing opportunities for design innovation and originality; however, the SLP should also ensure that housing projects are permitted only where they respect the setting and character of the local area. The SLP should ensure housing provision of different types, including accommodation for Gypsies, Travellers and Travelling Showpeople, reflects the latest evidenced needs and demands of the local population. Wherever possible, and at the earliest opportunity, Gypsy and Traveller communities should be consulted with to identify key issues that can be addressed and understand the needs of the community. The SLP policies should ensure proposed sites for Gypsies, Travellers and Travelling Showpeople seek to provide suitable access to local services, healthcare, and schools to facilitate sustainable development and integration with the community. This could include measures such as developing travel plans to improve public transport connections. The layout and design of new sites should be carefully considered with reference to good practice guidance⁵³. The SLP should ensure development proposals provide adequate indoor space in line with, or wherever possible exceeding, the requirements set out in the technical housing standards⁵⁴. Residential development proposals should incorporate functional private or communal open space, including green space. Reasonable alternatives should be identified which can be evaluated in the SA process, which is recommended to include: <ul style="list-style-type: none"> Options for the quantity of development to be delivered through the SLP. This can include consideration of overall dwelling numbers, employment floorspace and / or retail provision. Further spatial options, building on the 'development scenarios' considered at this stage, to consider how the entire housing number could be distributed across the Plan area once this is defined. Development sites, potentially including larger-scale broad locations for new development as well as smaller-scale sites, informed by the Call for Sites and strategic reviews of housing and employment land availability.

⁵³ Communities and Local Government (2008) Designing Gypsy and Traveller Sites: Good Practice Guide. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf [Date accessed: 25/10/23]

⁵⁴ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard___Final_Web_version.pdf [Date accessed: 24/10/23]

SA Objective	SA Commentary and Recommendations
Health:	<ul style="list-style-type: none"> Wherever possible and deliverable, the SLP should seek to increase the quality and quantity of green and blue infrastructure to provide multi-functional benefits including improved carbon storage, urban cooling, natural flood resilience/flood water storage, opportunities for food production, and provide a more attractive public realm to encourage active travel. This could include cross consideration of the 'Building with Nature' standards⁵⁵ or similar schemes. Developers, residents, landowners, and managers of open spaces should be encouraged to adopt a cooperative approach that connects buildings, gardens, and public spaces to create vibrant spaces that are interconnected. Such a network would enhance the quality of life for local residents. Improvements to the connectivity of active travel routes would encourage further uptake in active travel and provide health benefits to local residents. Ensure the provision of local services and community facilities where there is an identified need in the local area. Where appropriate, consider the option for community ownership of some facilities and services. The SLP should strive to minimise the exposure of residents, and particularly vulnerable groups, to existing sources of air pollution through careful consideration of the location, design, and configuration of new developments and particularly those close to AQMAS or main roads⁵⁶.
Equality:	<ul style="list-style-type: none"> The SLP should ensure development proposals, particularly in town centres, promote a safe and accessible neighbourhood, helping to reduce crime and the fear of crime. Consider supporting the use of the 'Secured by Design'⁵⁷ scheme in relation to crime prevention. Opportunities to increase the provision and coverage of high-speed broadband should be encouraged, including fibre to new housing. This would help to ensure new homes support opportunities for home working and learning whilst also contributing towards a reduced need to travel, particularly in more rural areas of the SLP area that would require larger commutes and are often restricted to lower speeds of broadband.
Transport and Accessibility:	<ul style="list-style-type: none"> Improving connectivity of active travel routes should be a priority, owing to the severance of many routes due to the landscape / townscape being dominated by the highway networks discouraging use. Electric vehicle charging networks should be supported including improved distribution and quantity of charging points and public transport options across the SLP area, in particular the rural areas of the SLP area, recognising the crucial role that local authorities play in enabling the transition to electric vehicles⁵⁸. A significant modal shift is required to support more sustainable modes of travel, particularly considering the heavy reliance on private car use in rural areas such as Tewkesbury. The SLP should seek opportunities to promote cycling, walking and public transport through consideration of transport infrastructure including the potential for reallocation of road space. Tewkesbury particularly is restricted in access to the railway network with few stations across its administrative area and should seek opportunities to improve the railway infrastructure.

⁵⁵ Building With Nature. Available at: <https://www.buildingwithnature.org.uk/> [Date accessed: 25/10/23]

⁵⁶ National Institute for Health and Care Excellence (2017) Air pollution: outdoor air quality and health. Available at: <https://www.nice.org.uk/guidance/ng70/chapter/recommendations> [Date accessed: 25/10/23]

⁵⁷ Secured by Design. Available at: <https://www.securedbydesign.com/> [Date accessed: 24/10/23]

⁵⁸ Office for Zero Emission Vehicles (2022) On-Street Residential Chargepoint Scheme. Available at: <https://www.gov.uk/government/publications/grants-for-local-authorities-to-provide-residential-on-street-chargepoints/grants-to-provide-residential-on-street-chargepoints-for-plug-in-electric-vehicles-guidance-for-local-authorities> [Date accessed: 25/10/23]

SA Objective	SA Commentary and Recommendations
	<ul style="list-style-type: none"> Development patterns and layouts should be designed to prioritise access via foot, bicycle and public transport, rather than by car, as advocated in Sport England’s Active Design guidance⁵⁹. The CGT authorities should consider the recommendations for walkable neighbourhoods as advocated in Sustrans guidance⁶⁰.
Education:	<ul style="list-style-type: none"> SLP policies should recognise the need to retain a young workforce, especially given the ageing population of the SLP area. Rural development should be linked to the existing transport infrastructure to provide sustainable access to educational facilities, especially given the small number of schools in rural areas.
Economy:	<ul style="list-style-type: none"> Development proposals for town centres should carefully consider up to date information and trends regarding the local and regional demand for different types of floorspace, especially following the COVID-19 pandemic, the increase in online shopping and changed perception of town centres^{61,62}. Ensure development proposals for employment-led use cumulatively meet the identified employment needs of the Plan area. This should be in accordance with the latest evidence need. The SLP policies should recognise the implications of an ageing population and introduce training and development to retain a young, skilled workforce. Opportunities should be explored in the SLP policies to achieve smart economic growth. This could be encouraged through the use of technology and innovative ways of working to increase productivity without damaging people’s quality of life or the environment. Ensure development proposals for employment-led use cumulatively meet the identified employment needs of the Plan area. This should be in accordance with the latest evidence need. Reasonable alternatives should be identified which can be evaluated in the SA process, including: <ul style="list-style-type: none"> Options for the quantity of development to be delivered through the SLP. This can include consideration of overall dwelling numbers, employment floorspace and / or retail provision. Development sites, potentially including larger-scale broad locations for new development as well as smaller-scale sites, informed by the Call for Sites and strategic reviews of housing and employment land availability.

⁵⁹ Sport England (2015) Active Design Guidance: Planning for health and wellbeing through sport and physical activity. Available at: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#activedesign-19603> [Date accessed: 23/01/23]

⁶⁰ Sustrans (2022) Walkable neighbourhoods: Building in the right places to reduce car dependency. Available at: <https://www.sustrans.org.uk/our-blog/research/all-themes/all/walkable-neighbourhoods-building-in-the-right-places-to-reduce-car-dependency> [Date accessed: 25/10/23]

⁶¹ Local Government Association (2021) The Future of High Streets and Town Centres: Trends Analysis/. Available at: <https://www.local.gov.uk/sites/default/files/documents/The%20future%20of%20high%20streets%20and%20town%20centres%20-%20trends%20analysis.pdf> [Date accessed: 24/10/23]

⁶² DLUHC & MHCLG (2021) Build Back Better High Streets. Available at: <https://www.gov.uk/government/publications/build-back-better-high-streets> [Date accessed: 24/10/23]

6 Conclusions and next steps

6.1 Consultation on the Regulation 18 SA Report

- 6.1.1 This Regulation 18 SA Report will be published by the CGT authorities for consultation with statutory consultees, stakeholders and the general public, alongside the Issues and Options consultation document between December 2023 and February 2024.
- 6.1.2 All responses to this consultation exercise should be made via the CGT website www.strategiclocalplan.org.
- 6.1.3 This report represents the latest stage of the SA process. Any comments received on this report during the consultation will be considered and used to inform subsequent stages of the SA process, where appropriate.
- 6.1.4 Further consultations and opportunities to comment on the emerging SLP and accompanying SA outputs will occur at each plan making stage.

6.2 Next steps

- 6.2.1 Once the CGT Councils have reviewed Regulation 18 consultation comments, the next stage of plan making will begin.
- 6.2.2 Reasonable alternatives will be identified by CGT and assessed through the SA process to enable options for the emerging SLP to be explored. This is likely to include options for the development strategy, policies, and development sites. In this way, the SA can provide a coherent 'story' of the SLP's evolution and choice of options by assessing reasonable alternatives prepared throughout the plan making process.
- 6.2.3 The assessment of options or reasonable alternatives is an important requirement of the SEA Regulations, which requires the Environmental Report to include "*an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information*".
- 6.2.4 The next iteration of the SLP is expected to comprise the 'Preferred Options' version, alongside which a second Regulation 18 SA Report will be prepared. This will include an assessment of further reasonable alternatives identified by the Councils and document the process by which the SLP Preferred Options will be identified.
- 6.2.5 At the Regulation 19 stage, preparation of an Environmental Report will begin, also known as a 'sustainability appraisal report' in planning practice guidance (PPG). The Environmental Report will include all the legal requirements set out in Regulation 12 and Schedule 2 of the SEA Regulations, enabling the Councils to meet the legal requirements set out in sections 19 and 39 of the Planning and Compulsory Purchase Act 2004.

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Appendix A – SA Framework

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
1	Climate change: Reduce the CGT authorities' contribution towards the causes of climate change.	a. Help to reduce the per capita carbon footprint in the CGT area? b. Help to reduce reliance on personal car use? c. Encourage renewable energy generation or use of energy from renewable sources? d. Ensure that sustainable construction principles are integrated into developments? e. Encourage climate resilience	<ul style="list-style-type: none"> Carbon emissions from domestic and industrial/commercial sources Energy generation/use from renewable or low-carbon sources Proximity of development to public transport links Distance to local services and amenities
2	Flood risk: Plan for anticipated levels of climate change.	a. Avoid development in areas at high risk of flooding and seek to reduce flood risk? b. Increase green infrastructure (GI) coverage and connectivity? c. Promote the use of technologies to adapt to the impacts of climate change? d. Ensure that development is resilient to the effects of extreme weather events?	<ul style="list-style-type: none"> Risk of fluvial and surface water flooding Provision and connectivity of GI Provision of sustainable drainage systems (SuDS) Implementation of adaptive techniques e.g. passive heating/cooling
3	Biodiversity and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	a. Protect, maintain and enhance features of biological and geological importance, including functionally linked land and habitats? b. Support the positive management of local biodiversity and geodiversity sites? c. Contribute towards the wider GI and ecological network? d. Deliver biodiversity net gain?	<ul style="list-style-type: none"> Potential impacts on sites designated for their biological or geological interest Presence of priority habitats Provision and connectivity of GI Biological quality of watercourses Functionally linked habitats
4	Landscape: Protect, enhance and manage the quality and character of landscapes and townscapes.	a. Safeguard and enhance local character and distinctiveness and strengthen sense of place? b. Protect and enhance visual amenity? c. Re-use degraded landscapes or townscapes? d. Protect and enhance the special character of the Cotswolds AONB? e. Align with the purposes of the Green Belt i.e. prevent coalescence of settlements and urban sprawl?	<ul style="list-style-type: none"> Proximity to the Cotswolds AONB Identified local landscape characteristics and sensitivities within the published Landscape Character Assessment Landscape sensitivity Impact on views and tranquility Re-use of brownfield land and/or derelict buildings Development in the Green Belt

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
5	Cultural heritage: Conserve, enhance and manage the historic environment.	a. Conserve and/or enhance the significance of heritage assets including its setting b. Respect, maintain and strengthen local character, distinctiveness and sense of place c. Sustain and enhance the significance of heritage assets by putting them to viable use, increasing public access and/or encourage tourism which are consistent with their conservation	<ul style="list-style-type: none"> • Potential impacts on Listed Buildings, Scheduled Monuments, Conservation Areas and Registered Parks and Gardens • Potential impact on locally important sites in the Historic Environment Record including those of archaeological importance • Historic assets on Historic England’s Heritage at Risk register • Historic characterisation and sensitivity
6	Pollution: Mitigate adverse impacts from existing air, water, soil and noise pollution and avoid generating further pollution.	a. Help to improve air quality and avoid generating further air pollution? b. Help to improve water quality and avoid generating further pollution to watercourses or groundwater? c. Remediate land affected by ground contamination? d. Help to reduce noise pollution and avoid generating further noise disturbance?	<ul style="list-style-type: none"> • Air Quality Management Areas (AQMA) • Areas of nitrogen dioxide (NO₂) exceedance • Proximity to main roads • Watercourse and groundwater quality • Remediation of contaminated land
7	Natural resources: Protect and conserve natural resources including soil, water and minerals.	a. Make use of previously developed, degraded or under-used land? b. Minimise the loss of best and most versatile (BMV) agricultural land? c. Avoid loss or sterilisation of mineral resources? d. Ensure efficient use of water resources and seek opportunities for water recycling?	<ul style="list-style-type: none"> • Re-use of previously developed or brownfield land • Area of potential BMV land • Proposed Mineral Safeguarding Areas • Remediation of contaminated land
8	Waste: Reduce waste generation and disposal and support sustainable management of waste.	a. Maximise the re-use, recycling and composting of waste? b. Minimise and where possible avoid the generation of excess waste during construction and occupation of development?	<ul style="list-style-type: none"> • Household waste generation • Industrial/commercial waste generation • Rates of recycling and composting • Capacity of waste management facilities
9	Housing: Provide affordable, high quality and environmentally sound housing for all.	a. Provide a suitable mix and tenure of housing including affordable homes and homes suitable for first-time buyers? b. Provide housing suitable to accommodate the ageing population? c. Ensure that the best use is made of existing housing stock?	<ul style="list-style-type: none"> • Housing stock • Provision of varied housing mix • Provision of affordable housing • Provision of care homes or sheltered accommodation • Gypsies and Travellers accommodation

	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
10	Health: Safeguard and improve community health, safety and wellbeing.	a. Improve access to local health and leisure facilities? b. Provide good access to open spaces and the GI network? c. Facilitate active travel and encourage healthy lifestyles? d. Ensure the needs of the ageing population are met?	<ul style="list-style-type: none"> Proximity to sources of air pollution (e.g. AQMAS and main roads) Proximity to NHS hospital Proximity to GP surgery Provision and accessibility of public green spaces and recreation facilities Connectivity to pedestrian and cycle networks
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	a. Reduce inequalities? b. Reduce crime and the fear of crime? c. Create safe neighbourhoods and support community cohesion? d. Prevent discrimination, victimisation and harassment?	<ul style="list-style-type: none"> Indices of Multiple Deprivation/Lower Super Output Areas Health indicators Rates of crime
12	Transport and accessibility: Improve accessibility, increase the proportion of travel by sustainable modes and reduce the need to travel.	a. Reduce the need to travel and/or reduce travel time? b. Support a modal shift away from personal car use? c. Maximise opportunities for access via a range of sustainable transport modes including walking, cycling and public transport?	<ul style="list-style-type: none"> Proximity to bus stop and frequency of bus services Proximity and accessibility to railway stations Proximity to local shops, facilities and employment opportunities Connectivity to pedestrian and cycle networks
13	Education: Increase access to education and improve attainment to develop and maintain a skilled workforce.	a. Provide or improve sustainable access to education and training opportunities? b. Support the provision of an appropriately skilled workforce? c. Support opportunities for community enterprises and the voluntary sector?	<ul style="list-style-type: none"> Proximity to primary and secondary schools Capacity of primary and secondary schools Access to higher education opportunities Qualification levels e.g. National Vocational Qualifications
14	Economy: Ensure sufficient employment land and premises are available to develop and support diverse, innovative and sustainable growth.	a. Provide or improve sustainable access to a range of employment opportunities? b. Protect and create jobs? c. Encourage business start-ups in the CGT area? d. Protect and enhance the vitality and viability of existing employment areas?	<ul style="list-style-type: none"> Access to employment opportunities Provision of employment floorspace Number of vacant units Rates of unemployment

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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