

CHELTENHAM BOROUGH COUNCIL

CHELTENHAM

# Local development framework



Development on garden  
land and infill sites in  
Cheltenham

Sustainability Appraisal

June 2009





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For more information on scoping please go to the Cheltenham LDF website [www.cheltenham.gov.uk](http://www.cheltenham.gov.uk)

## 1 Introduction

- 1.1 This document reports on the sustainability appraisal (SA) of the final 'Development on garden land and infill sites in Cheltenham' Supplementary Planning Document (June 2009) – the SPD. The SA is being prepared on behalf of Cheltenham Borough Council, by consultants Baker Associates. It is intended to provide an examination of whether implementing the SPD would help deliver control and deliver development on garden land in Cheltenham that is compatible with sustainable development. This report follows an earlier SA report of the draft SPD, which was available for consultation alongside that version of the SPD.
- 1.2 The Garden Land Supplementary Planning Document (SPD) is intended to support the Council policy to development in private green spaces. With the intention of respecting and enhancing the existing character and amenity of these areas, as well as developing in a way to reduce environmental impacts.
- 1.3 The SPD will be a 'material consideration' as part of decision-making on planning applications. Therefore, it is necessary to consider the contribution that implementing the plan will have to delivering sustainable development.
- 1.4 The sustainability appraisal (SA) of the SPD is a process carried out in order to help create a more sustainable plan. The draft report documented the findings of the SA of the draft SPD, identifying what the sustainability implications might be of implementing the draft document.. The SA of the draft SPD followed on from a Scoping Report prepared for the SA that set out the background to the process, the influences on, and matters to be included, in the SA process. This was consulted on with statutory consultees. This final SA Report has been prepared to accompany the adopted version of the SPD, as is required through regulations.
- 1.5 The SA report of the draft SPD was open to consultation alongside the SPD. Very few responses were received to the SA, with only the Environment Agency, Natural England and English Heritage making a comment. These comments and the SA response are logged in appendix 4, indicating how the SA will take these matters forward in the appraisal.
- 1.6 The SA notes that it is clear that the intention of the SPD is to help achieve more sustainable development in this area, as is the role of good planning. However, the scope of the SPD does limit the extent to which this can achieve benefits for all aspects of sustainable development. This is because the SPD has an intentionally limited remit to the consideration of new homes in these locations looking at maintaining character and amenity.
- 1.7 This SA not only looks at the coverage of issues in the SPD related to sustainable development; identifying matters that could be addressed in greater detail to improve performance. However, it also considers whether the approach taken in the SPD is likely to be successfully implemented, and

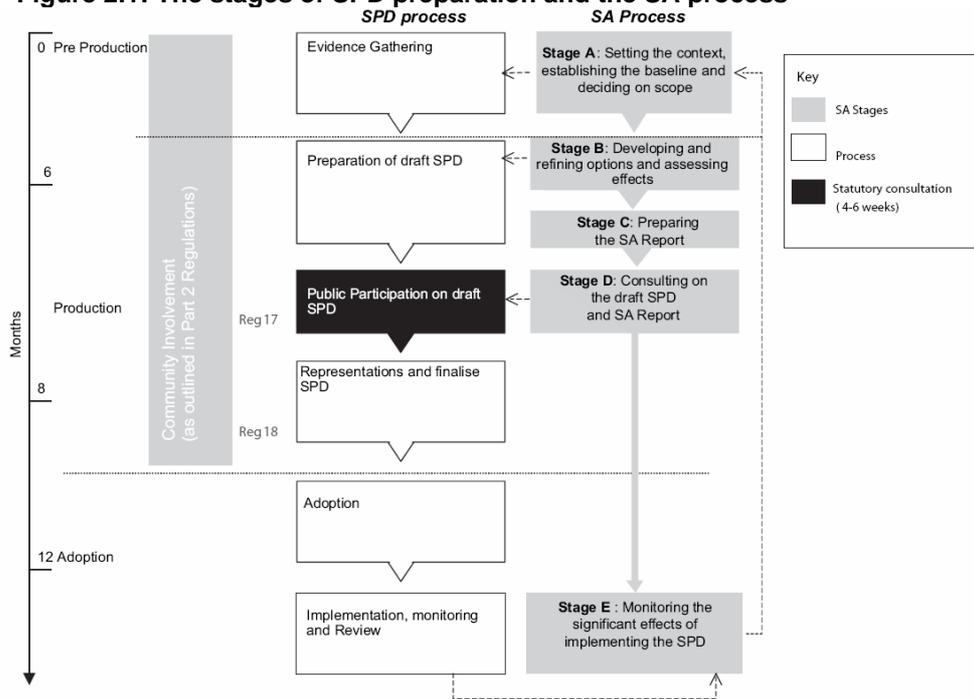
therefore actually achieve the anticipated benefits. For this reason the structure of the SPD is also commented on, and how easy it will be for stakeholders to make use of in delivering better developments.

## 2 The method of sustainability appraisal

- 2.1 Sustainability appraisal (SA) is required of the emerging Garden Land SPD prior to adoption as full SPD, under the regulations of the Planning and Compulsory Purchase Act 2004. Strategic Environmental Assessment (SEA) of certain plans and programmes and also required by the European Directive EC/2001/42. The approach taken to the SA in this case is to ensure that there is a thorough investigation of the sustainability implications of implementing the SPD, whilst ensuring the scale and nature of the appraisal is in keeping with the role and function of the SPD. The aim of which is to meet the SEA and SA requirements through a common process with common reporting – jointly known as an SA.
- 2.2 This pragmatic and combined approach does not mean that the SA and findings will be compromised. The appraisal approach remains thorough and robust, based on the particular needs and characteristics of the area and the SPD.
- 2.3 Despite both the SA and the SPD being prepared by Baker Associates the two process have been undertaken independently by different teams. This is essential in providing a proper test of the planning document. It is only through being removed from the process of preparation that it is possible to give a full critical analysis of the approach followed, and the identification of possible weakness or gaps.
- 2.4 However, there have been discussions between those undertaking the SA and those preparing the SPD to allow sustainability matters to be incorporated into the SPD through more informal feedback of ideas. The SA of the draft was also taken into account, alongside consultation responses, by those preparing the plan when preparing the final SPD.
- 2.5 Sustainability Appraisal is an integral part of good plan making and should not be seen as a separate activity. Its purpose is to promote sustainable development by integrating sustainability considerations into plans. By testing the emerging content of the SPD it is possible to identify any likely significant effects of the plan, and give opportunities for improving the social, environmental and economic conditions by implementing the plan.
- 2.6 Sustainability Appraisal should consider several criteria:
  - the long-term view of how the area covered by the plan is expected to develop
  - a mechanism for ensuring that sustainability objectives are translated into sustainable policies
  - reflect global, national, regional and local concerns;
  - form and integral part of all stages of plan preparation
  - incorporate the requirements of the SEA Directive.

- 2.7 The method of sustainability appraisal uses the framework of sustainability objectives (section 4) as the basis for assessment of the effectiveness of the SPD. Using these objectives, as a general description of sustainability considerations relevant to garden land development, it is possible to assess whether the SPD is helping to make a contribution to more sustainable development. A commentary based appraisal approach has been carried out, discussing each development principle, development standards and proposals in turn to consider its possible implications of implementation on sustainable development.
- 2.8 Figure 2.1 show shows the stages of the SA process and how they link to the development of the Cheltenham Garden Land SPD.

**Figure 2.1: The stages of SPD preparation and the SA process**



- 2.9 The Sustainability Appraisal process has five stages, and their relationship to the requirements of the Strategic Environmental Assessment Directive are summarised in figure 2.2 below.

| <b>Figure 2.2: The Sustainability Appraisal/Strategic Environmental Assessment process</b>                  |   |
|---|---|
| <b>Sustainability Appraisal Stage</b>   | <b>Strategic Environmental Assessment Directive Requirement</b>   |
| A1: Identification of other relevant policies, plans and programmes, and sustainable development objectives | An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or |

|   |  |
|---|--|
|   | programme and the way those objectives and any environmental considerations have been taken into account during its preparation.   |
| A2: Collection of baseline information  | The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. The environmental characteristics of areas likely to be affected.   |
| A3: Identification of sustainability issues and problems                                    | Any existing environmental problems that are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.   |
| A4: Development of an Sustainability Appraisal Framework                                    |  |
| A5: Consultation on the scope of the Sustainability Appraisal with the statutory consultees | The authorities designated by Member States shall be consulted when deciding on the scope and level of detail of the information that must be included in the Environmental Report.  |
| B1: Testing any SPD objectives against the Sustainability Appraisal Framework               |  |
| B2: Developing the SPD options  | Identification, description and evaluation of likely significant effects on the environment of reasonable alternatives. An outline of the reasons for selecting the alternatives dealt with.   |
| B3: Predicting the effects of the draft SDP   | The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors |
| B4: Evaluating the effects of the draft SPD   |  |
| B5: Considering ways of mitigating adverse effects and maximising beneficial effects        | The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.  |
| B6: Proposing measures to monitor the significant effects of implementing the SPD           | A description of the measures envisaged concerning monitoring.   |
| C1: Preparing the Sustainability Appraisal Report   | Preparation of an Environmental Report.  |
| D1: Public participation on the Sustainability Appraisal Report and the draft SPD           | The draft plan or programme and the Environmental Report shall be made available to the designated authorities and the public.   |
| D2: Assessing significant changes   |  |
| D3: Making decisions and providing information  | A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report and the opinions expressed have been taken into account and the reasons for choosing the plan or programme as adopted, in the light of reasonable alternatives.                      |
| E1: Finalising aims and methods   | Member States shall monitor the significant environmental effects of the implementation of plans   |

|                                   |  |
|-----------------------------------|--|
| for monitoring                    | and programmes in order to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action. |
| E2: Responding to adverse effects |  |

- 2.10 The appraisal process for the Garden Land SPD will be undertaken taking into account government guidance and is compliance with the Strategic Environmental Assessment Directive.
- 2.11 A brief statement of how the SPD has been informed by the SA process through the preparation process is included as Appendix 5.

### 3 Scoping

- 3.1 The SA process began with the initial stage of preparing a scoping report. This report included the collection on information and sustainability matters that characterise Cheltenham and are relevant to the issues that will be covered through the SPD. The preparation of a scoping report is a statutory requirement of The Environmental Assessment of Plans and Programmes Regulations, 2004 (commonly known as the SEA Regulations).
- 3.2 This scoping report was prepared by Baker Associates. However, the report drew on the work already completed by the Council on scoping for the Scoping Report for the Cheltenham Borough Council's Core Strategy – (revised to reflect the consultation responses) July 2008. However, this was distilled down to the issues that are relevant for the SPD. For instance, the number of sustainability objectives were reduced from 28 to 15 for the SA to remove those that the SPD cannot, and should not, be aiming to address.
- 3.3 The purpose of the scoping report is to allow certain consultees, defined in the SEA Regulation, to comment on the proposed coverage and approach to the SA. The Scoping Report was put out to consultation for the statutory five week consultation period finishing 6 February 2009. Comments were received from the Environment Agency, and these and response are in appendix 1. A copy of the scoping report, draft SA Report for consultation and this report can be found in supplementary planning documents section on the Cheltenham Borough Council planning policy website at : [www.cheltenham.gov.uk](http://www.cheltenham.gov.uk)
- 3.4 The scoping report provided background material essential to this SA. It included:
- an introduction to the SA/SEA process
  - details of the specific plan, policies and programmes relevant to Cheltenham, seeking to focus down on the detail of the most relevant documents (appendix 3)
  - a focused review of the baseline sustainability character of Cheltenham, looking at social, economic and environmental characteristics

- identification of key issues in the area that need to be considered (appendix 2)
- the sustainability framework setting the objectives for sustainable development to be used in the SA.

3.5 The SA of the draft SPD is largely the same as this final version of the SA. However, in this report identified sustainability implications of the SPD that have been resolved between the draft and final versions, have been removed and updated where necessary.

#### **Baseline data relevant to garden land**

- 3.6 The baseline data shown in the scoping report is based on the schedule prepared for the Core Strategy Scoping Report. However, it was the intention of this scoping report to focus on those sustainability issues with a direct relationship to the purpose of a Garden Land Supplementary Planning Document (SPD).
- 3.7 The role of the SPD is to set out the considerations by which the suitability of a proposed development on garden land will be tested. The SPD concentrates only on matters of the existing natural and built character of the area, the impact on amenity for nearby residents, water run-off and play.
- 3.8 This means all other matters on the form and construction of buildings will be covered by other guidance and policy. Matters not covered by the SPD include, sustainable construction, infrastructure provision, energy efficiency and renewable energy. Therefore, including these as objectives for the SA would be unsuitable as they were never intended to be delivered using this SPD.
- 3.9 The issues that have been included in the baseline are:
- Biodiversity –gardens can provide a high quality biodiversity asset, with trees and plants providing the habitat for a range of wildlife
  - Built environment character and the historic environment –gardens and open space make an important contribution to the character of the Cheltenham, development on garden land can adversely impact on this character
  - Access to open space for health and wellbeing – gardens have a value to health and wellbeing, through providing accessible spaces for relaxation
  - Landscape and the efficient use of land – use of garden land may reduce the amount of development that has to be located outside the existing urban area, therefore protecting existing land assets
  - Traffic and transport – more development within urban areas can help create patterns and densities of development that will help reduce the need to travel and support local shops and services.

- Housing delivery – the role of garden land in helping provide homes in the Borough, towards meeting regional delivery targets and homes to meet needs
- Pollution impacts – how development in garden land may help reduce car use and therefore help avoid pollution, in addition to other considerations such as potential light impact
- Employment land – employment land in urban areas is being lost to other uses, this may be from pressure from housing, and may affect the vibrancy of the town and access to local jobs
- Social equity – development in the urban areas needs to ensure that no one group, community or neighbourhood is put at risk inequitable harm from the pressures of new development
- Water – urban development, and changing green spaces to hard landscaped spaces has the potential to increase risk of flood through water run-off
- Climate change – urban development of all types should consider its role in mitigating and adapting to climate change.

3.10 As part of the sustainability appraisal process it is required that the key sustainability issues be identified. The purpose of which is to establish what the SPD will need to address in order to demonstrate greater sustainable development, and therefore essential in the sustainability appraisal process.

3.11 Appendix 2 contains a table of the main issues relevant to the SA of the SPD. This includes the details of the evidence and trends from data analysis that pinpoint a matter as related to sustainable development and the SPD. The topics of most relevance are:

#### **Environment**

- **Conservation Areas and Listed Buildings** – significant conservation area coverage and high numbers of listed buildings
- **Habitats** – small number of designated sites and very low area of SSSI's in favourable condition, decreasing numbers of trees on council owned land
- **Land designated as AONB or Green Belt** – plays an important role in protecting the unique setting and landscape character of Cheltenham
- **Flooding** – significant risks from flooding, especially with changing climate
- **Allotments** – growing demand for allotments, but number of sites is decreasing
- **CO<sub>2</sub> emissions and carbon footprint** – electricity use and CO<sub>2</sub> emissions are rising, rather than falling in line with national targets. CO<sub>2</sub> emissions and electricity consumption within the business sector are increasing steadily

- **Brownfield land** – high take-up means fewer sites available bringing pressures on garden areas, which impacts on quality of life, opportunities for food growing, wildlife and flooding

#### **Economic**

- **Maintaining a strong economy** – need to ensure that new and existing businesses have opportunities to expand and develop sustainably
- **Loss of employment land** – despite a thriving economy the amount of land used for employment purposes is declining
- **Reinforcing the Town Centre** – ensuring that Cheltenham's key role as a retail, service, leisure and learning destination is strengthened

#### **Society**

- **Population** – growing slowly with most of increase in working age population. Fewer children could mean a smaller workforce in future.
- **Affordability** – house prices risen dramatically and fewer affordable homes available
- **Housing** – Cheltenham must meet its housing requirements set by the region, in order to deliver the homes it has been predicted are necessary to accommodate the existing population, population growth and people moving to the area

## 4 The sustainability appraisal framework

- 4.1 The Sustainability Appraisal Framework of objectives, criteria and indicators provides a vital tool to enable the sustainability effects of the Core Strategy to be described, analysed and compared.
- 4.2 Figure 4.1 pulls together all the themes and issues identified at scoping, with the an indication of the aims of Cheltenham's Sustainable Community Strategy. These have all have helped to shape the Sustainability Objectives for the SA.
- 4.3 This set of objectives used in the SA of Garden Land is drawn from the set prepared for the scoping report of the Cheltenham Core Strategy – including post consultation revisions July 2008.
- 4.4 The Strategic Environmental Assessment Directive stipulates that a number of environmental topics need to be addressed in the Strategic Environmental Assessment process. Figure 4.1 also identifies how each of the statutory Strategic Environmental Assessment topics has been addressed in the Sustainability Appraisal Framework.
- 4.5 The next stage in the development of the Sustainability Appraisal Framework was determining a series of **Decision Aiding Questions**, which

should assist the assessment process when the whole Framework was used to appraise the policies and options contained in the SPD for their social, environmental and economic effects. Following on from these a number of detailed **Potential Detailed Indicators** to monitor and review performance were identified. However, these may need to be integrated into the monitoring provision for the wider development policies, as it is unlikely that there will be resources to set up a monitoring scheme specifically relating to the SA of this SPD.

Figure 4.1: Stage A4 – Sustainability Objectives

| Key Sustainability Theme   | Key Sustainability Issue  | SEA Topic   | Sustainable Community Strategy  | Sustainability Objective (stage A4)   |
|--|---|---|---|---|
| <b>1. Living within environmental limits (natural resource protection and enhancement)</b>   |   |   |   |   |
| <b>Biodiversity</b> – work with the grain of nature to protect, create, restore and enhance habitats, species and sites of geological interest   | <b>Habitats</b> – small number of designated sites and very low area of Sites of Special Scientific Interest in favourable condition, decreasing numbers of trees on council owned land. The importance of garden land for biodiversity protection. | Biodiversity, fauna and flora<br>Cultural heritage and landscape            | <b>Investing in environmental quality</b> – ensure that new development enhances biodiversity; work to conserve and enhance biodiversity  | <b>BIODIVERSITY</b><br>1. Protect, restore, create and enhance habitats, species and sites of wildlife or geological interest |
| <b>Climate change</b> – reduce carbon emissions through improving energy efficiency and promoting renewable sources of energy, and reduce vulnerability to the impacts of climate change | <b>CO2 emissions</b> – electricity use and CO2 emissions are rising, rather than falling in line with national targets  | Climatic factors<br>Air<br>Biodiversity, fauna and flora<br>Material assets | <b>Tackling climate change</b> – commitment to reducing carbon emissions, striving for a carbon-neutral borough. Support for sustainable energy processes, saving energy and encouraging use of renewable sources. Everyone able to adapt to the inevitable consequences of climate change. | <b>CLIMATE CHANGE</b><br>2. Reduce carbon emissions, striving for a carbon neutral borough                                    |
|  | <b>Renewable energy generation</b> – a general lack of renewable facilities and installations in Cheltenham   |   |   | 3. Improve the resilience of people, businesses and the environment to the inevitable consequences of climate change          |
| <b>Water</b> – conserve water resources and reduce pollution, flood risk and surface water run-off   | <b>Flooding</b> – significant risks from flooding, especially with changing climate   | Water and soil<br>Climatic factors  | <b>Investing in environmental quality</b> – need to ensure infrastructure and built and natural environmental assets are resilient to weather extremes such as water shortages and flooding   | <b>FLOOD</b><br>4. Manage and reduce flood risk and surface water run-off   |
| <b>Transport</b> – promote a safe, efficient and integrated transport system that reduces the need to travel and   | <b>Transport</b> – increasing traffic volumes, cycling, walking, but public transport use is below  | Population and human health   | <b>Investing in travel and transport</b> – action to encourage cycling, walking and good public   | <b>TRANSPORT</b><br>5. Reduce the need to travel  |

| Key Sustainability Theme   | Key Sustainability Issue   | SEA Topic   | Sustainable Community Strategy  | Sustainability Objective (stage A4)   |
|--|--|---|---|---|
| dependency on high carbon modes of transport, and improves reliability and accessibility   | average  | Air<br>Climatic factors<br>Material assets  | transport and to reduce car use to reduce congestion and carbon emissions   |   |
|  | <b>Car ownership</b> – while the number of households with 2 or more cars is high, the number without access to a car is also significant  |   |   |   |
| <b>Land resources</b> – protect good quality land and soil, enhance sensitive and valued landscapes and encourage recycling of previously developed land and buildings | <b>Brownfield land</b> – high take-up means fewer sites available, bringing pressures on garden areas, which impacts on quality of life, opportunities for food growing, wildlife and flooding | Biodiversity, fauna and flora<br>Cultural heritage and landscape<br>Water and soil<br>Material assets | <b>Promote sustainable living</b> – make the most efficient and appropriate use of land   | <b>LAND RESOURCES</b><br>6. Maximise appropriate reuse of previously developed land                                     |
|  | <b>Land designated as AONB or Green Belt</b> – plays an important role in protecting the unique setting and landscape character of Cheltenham  |   |   | 7. Minimise development of open land and green spaces within Cheltenham   |
|  |  |   | <b>Investing in environmental quality</b> – ensure new development enhances Cheltenham's assets and improves biodiversity and that parks and open areas are managed to reduce resource use and encourage wildlife | 8. Protect and enhance the unique setting and landscape character of Cheltenham   |
| <b>Built environment</b> – encourage a safe, clean and attractive environment and protect, enhance and improve understanding of the historic heritage                  | <b>Conservation Areas and Listed Buildings</b> – significant conservation area coverage and high numbers of listed buildings   | Cultural heritage and landscape<br>Material assets  | <b>Investing in environmental quality</b> – promote quality of design in the public realm   | <b>BUILT ENVIRONMENT</b><br>9. Protect and enhance Cheltenham's distinctive townscape quality and its historic heritage |

| Key Sustainability Theme  | Key Sustainability Issue   | SEA Topic  | Sustainable Community Strategy   | Sustainability Objective (stage A4)   |
|---|--|--|--|---|
| <b>Pollution</b> – reduce risks to health and the environment by reducing air and noise pollution and contaminated land   | <b>Pollution</b> – although air quality is not a significant issue, light pollution levels are saturated                                   | Population and human health<br>Water and soil<br>Air<br>Material assets              | <b>Investing in environmental quality</b> – support improved cleanliness and maintenance of the public realm   | <b>POLLUTION</b><br>10. Improve air and soil quality and reduce noise and light pollution and the amount of contaminated land         |
| <b>2. A sustainable economy (sustainable consumption and production)</b>  |  |  |  |   |
| <b>2A. Economic development</b> – encourage sustainable economic and tourism growth which ensures high quality employment opportunities, a skilled workforce and prosperity without harming environmental quality | <b>Maintaining a strong economy</b> – need to ensure that new and existing businesses have opportunities to expand and develop sustainably | Population and human health<br>Climatic factors<br>Water and soil<br>Material assets | <b>A strong and sustainable economy</b> – ensure a vibrant and sustainable low carbon economy with a diverse employment base and a commitment to excellence and innovation<br>– ensure that growth respects environmental limits and dependency on carbon while also taking into account the needs of the business community now and in future | <b>EMPLOYMENT LAND AND PREMISES</b><br>11. Ensure the availability of land and premises to secure the future prosperity of Cheltenham |
|   | <b>Loss of employment land</b> – despite a thriving economy the amount of land used for employment purposes is declining                   |  |  |   |
| <b>3. A strong, healthy and just society (sustainable communities)</b>  |  |  |  |   |
| <b>3A. Social cohesion</b> – reduce inequalities in health, education and learning, employment opportunities, crime and environmental quality and promote a more inclusive society, locally and globally          | <b>Deprivation</b> – nearly a tenth of the population living in highly deprived areas, 16% children in households on benefits              | Population and human health<br>Climatic factors<br>Air                               | <b>Building stronger communities</b> – support community regeneration in areas of multiple deprivation. Work in partnership to tackle health inequalities. Promote lifelong learning opportunities for all.  | 12. Promote more inclusive and self-contained communities to reduce the need to travel for everyday requirements                      |

| Key Sustainability Theme   | Key Sustainability Issue   | SEA Topic                                      | Sustainable Community Strategy  | Sustainability Objective (stage A4)  |
|--|--|--|---|--|
| <b>3B. Health</b> – improve mental and physical health and wellbeing and reduce inequalities   | <b>Health</b> – generally good, although suicide rates are high  | Population and human health                    | <b>Building healthy communities</b> – equitable access to locally-provided community based health and care services   | <b>HEALTH</b><br>13. Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities                                    |
| <b>3C. Housing</b> – improve access to a wide choice of affordable and safe housing, especially for disadvantaged members of society, ensuring that best use is made of existing housing stock | <b>Population</b> – growing slowly with most of increase in working age population, number of households increasing  | Population and human health<br>Material assets | <b>Supporting housing choice</b> – a choice of sustainable, quality, accessible and well-managed affordable homes<br><b>Supporting older people</b> – promote independent living for older people | <b>HOUSING</b><br>14. Ensure everyone has access to a decent home that they can afford and which meets their needs, ensuring that best use is made of the existing housing stock |
|  | <b>Affordability</b> – house prices risen dramatically and fewer affordable homes available  |  |   |  |
|  | <b>Housing stock</b> – despite high levels of house building, little new housing is affordable and number of empty and second homes remains high   |  |   |  |
|  | <b>Housing delivery</b> – The draft and revised Panel Report for the RSS show that at least 6,500 homes need to be provided in urban Cheltenham. Figures show that for 07/08 10% of housing permissions were for garden land, and 08/09 (so far) it is 2% of the total. This means theoretically garden land could provide 130-650 of the total amount of homes in urban Cheltenham. |  |   |  |

| Key Sustainability Theme   | Key Sustainability Issue  | SEA Topic   | Sustainable Community Strategy   | Sustainability Objective (stage A4)   |
|--|---|---|--|---|
| <p><b>3D. Green space</b> – retain, create and enhance open spaces for recreation and sport to improve wellbeing</p> | <p><b>Allotments</b> – growing demand for allotments, for food production but number of sites is decreasing</p> | <p>Biodiversity, fauna and flora<br/>Climatic factors<br/>Population and human health</p> | <p><b>Investing in environmental quality</b> – parks and open spaces managed to reduce resource use and encourage wildlife; promote importance of gardens to local amenity</p> | <p><b>GREEN SPACE</b><br/>15. Protect and enhance open spaces, gardens and allotments for leisure and recreation, including creating opportunities for wildlife and local food production</p> |

- 4.6 The Sustainability Objectives, Decision Aiding Questions and Potential Detailed Indicators are drawn together in Figure 4.2.
- 4.7 The SA Framework is used as the definition of what sustainability development means in relation to an SA of this SPD. Therefore, it focuses on those issues related to sustainable development that should be, or could be, delivered by the SPD. The proposals and guidance of the SPD were then compared with each of the sustainability objectives to test whether it would be helping to make to make a contribution to sustainable development.

**Figure 4.2: The Sustainability Appraisal Framework**

| <b>Sustainability Objective (Stage A4)</b>  | <b>Decision Aiding Questions<br/>Will the SPD...</b>   | <b>Potential Detailed Indicators</b>   |
|---|--|--|
| <b>BIODIVERSITY</b><br>1. Protect, restore, create and enhance habitats, species and sites of wildlife or geological interest | <ul style="list-style-type: none"> <li>• Ensure that habitats and sites of wildlife or geological interest are protected, restored and enhanced?</li> <li>• Promote the creation of new habitats and sites of wildlife interest?</li> <li>• Respect biodiversity wherever it is found, including in mature garden land?</li> </ul> | <ul style="list-style-type: none"> <li>• Quantity of designated LNR (and area of land)</li> <li>• Proposed LNRs (and area of land)</li> <li>• Area of designated local nature reserves/per1000 population</li> <li>• Important habitats</li> <li>• Number of key wildlife sites and area</li> <li>• Net increase/decrease in trees</li> <li>• New/replacement trees on CBC land</li> <li>• Loss of mature garden land</li> </ul> |
| <b>CLIMATE CHANGE</b><br>2. Reduce carbon emissions, striving for a carbon neutral borough                                    | <ul style="list-style-type: none"> <li>• Reduce dependency on fossil fuels?</li> <li>• Reduce carbon emissions from new and existing buildings and increase energy efficiency?</li> <li>• Reduce the need to travel by promoting higher density development?</li> </ul>  | <ul style="list-style-type: none"> <li>• Total CO<sub>2</sub> emissions for Cheltenham</li> <li>• Total CO<sub>2</sub> emissions per capita</li> </ul>   |
| 3. Improve the resilience of people, businesses and the environment to the inevitable consequences of climate change          | <ul style="list-style-type: none"> <li>• Ensure new and existing buildings, infrastructure and the environment are resilient to the effects of extreme weather events?</li> <li>• Help people, businesses and the environment to adapt to the physical and social impacts of climate change?</li> </ul>                            | <ul style="list-style-type: none"> <li>• Developments meeting Code for Sustainable Homes (and previously EcoHomes) or BREEAM standards</li> </ul>  |
| <b>FLOOD</b><br>4. Manage and reduce flood risk and surface water run-off   | <ul style="list-style-type: none"> <li>• Ensure flood risk is reduced?</li> <li>• Ensure that development does not increase surface water run-off?</li> <li>• Ensure that surface water run-off</li> </ul>   | <ul style="list-style-type: none"> <li>• Area of land in floodplain</li> <li>• Percentage of borough in floodplain</li> <li>• Area liable to flood</li> </ul>  |

| Sustainability Objective (Stage A4)   | Decision Aiding Questions Will the SPD...   | Potential Detailed Indicators  |
|---|---|--|
|   | <ul style="list-style-type: none"> <li>• is slowed and absorbed?</li> <li>• Support Sustainable Urban Drainage?</li> <li>• Help adaptation to the reality and aftermath of flooding?</li> </ul>   | <ul style="list-style-type: none"> <li>• Surface water run-off</li> <li>• Groundwater flooding</li> <li>• Developments incorporating sustainable drainage systems</li> <li>• Number of properties at risk from flooding</li> </ul>   |
| <p><b>TRANSPORT</b><br/>5. Reduce the need to travel</p>  | <ul style="list-style-type: none"> <li>• Reduce the frequency and duration of journeys?</li> <li>• Reduce the need to travel by improving access to services, jobs, leisure and amenities?</li> <li>• Promote an urban form that reduces the need and distance travelled to access essential services?</li> </ul>                 | <ul style="list-style-type: none"> <li>• Average daily traffic flow on principal roads</li> <li>• Estimated traffic flows for all vehicle types</li> <li>• Containment rate</li> </ul>   |
| <p><b>LAND RESOURCES</b><br/>6. Maximise appropriate reuse of previously developed land</p>   | <ul style="list-style-type: none"> <li>• Encourage the development of previously developed land?</li> <li>• Reduce the number of vacant and derelict buildings?</li> </ul>  | <ul style="list-style-type: none"> <li>• % new homes built on previously developed land</li> <li>• Number of dwellings empty for over 6 months</li> </ul>  |
| <p>7. Minimise development of open land and green spaces within Cheltenham</p>  | <ul style="list-style-type: none"> <li>• Minimise development of open land and green spaces within Cheltenham, including gardens to protect biodiversity and opportunities for local food production?</li> </ul>  | <ul style="list-style-type: none"> <li>• % of gardens built on</li> <li>• Green space data (data not yet available)</li> </ul>   |
| <p>8. Protect and enhance the unique setting and landscape character of Cheltenham</p>  | <ul style="list-style-type: none"> <li>• Protect the urban landscape and the contribution of public and private open space to the character and quality of the built environment?</li> <li>• Protect and enhance the landscape character surrounding Cheltenham?</li> </ul>   | <ul style="list-style-type: none"> <li>• Loss of green space / garden land</li> </ul>  |
| <p><b>BUILT ENVIRONMENT</b><br/>9. Protect and enhance Cheltenham's distinctive townscape quality and its historic heritage</p>       | <ul style="list-style-type: none"> <li>• Protect and enhance Cheltenham's historic heritage?</li> <li>• Promote good design that enhances Cheltenham's distinctive public realm?</li> <li>• Recognise and protect contribution of public and private open space to the character and quality of the built environment?</li> </ul> | <ul style="list-style-type: none"> <li>• % of land designated as conservation area</li> <li>• No of conservation areas</li> <li>• Percentage of conservation areas with up-to-date character appraisals/management proposals</li> <li>• No of listed buildings</li> <li>• Loss of green space / garden land</li> </ul> |
| <p><b>POLLUTION</b><br/>10. Improve air and soil quality and reduce noise and light pollution and the amount of contaminated land</p> | <ul style="list-style-type: none"> <li>• Reduce air pollution?</li> <li>• Reduce light and noise pollution?</li> <li>• Improve the quality of contaminated land?</li> <li>• Minimise loss of soils to development and improve soil</li> </ul>   | <ul style="list-style-type: none"> <li>• Light pollution</li> <li>• Air quality management areas</li> <li>• No sites of potential concern with respect to contamination</li> <li>• Air quality monitoring information</li> </ul>   |

| Sustainability Objective (Stage A4)  | Decision Aiding Questions Will the SPD...  | Potential Detailed Indicators  |
|--|--|--|
|  | quality?   |  |
| <b>EMPLOYMENT LAND AND PREMISES</b><br>11. Ensure the availability of land and premises to secure the future prosperity of Cheltenham  | <ul style="list-style-type: none"> <li>Protect and enhance the vitality and viability of existing employment areas?</li> <li>Ensure the provision of adequate land and premises to meet the needs of existing and new businesses?</li> </ul>   | <ul style="list-style-type: none"> <li>Availability of employment land</li> </ul>  |
| <b>SOCIAL EQUITY</b><br>12. Promote more inclusive and self-contained communities to reduce the need to travel for everyday requirements   | <ul style="list-style-type: none"> <li>Support and enhance the role of local neighbourhood centres to meet everyday needs?</li> <li>Encourage the provision of local services and facilities to help communities become more self-contained?</li> <li>Help create a pattern of development that reduce the distance and need for travel to access essential services?</li> </ul> | <ul style="list-style-type: none"> <li>Average daily traffic flow on principal roads</li> <li>More indicators needed</li> <li>Regional indicators required</li> </ul>  |
| <b>HEALTH</b><br>13. Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities                                    | <ul style="list-style-type: none"> <li>Help people to live healthy lifestyles and reduce obesity?</li> <li>Ensure access to local health facilities?</li> <li>Protect access to areas of public and private open space for outdoor recreation?</li> </ul>  | <ul style="list-style-type: none"> <li>Death rate by cause for every 100,000 people in the population – cancer in under 75s; circulatory diseases in under 75s; suicide; all accidents</li> </ul>  |
| <b>HOUSING</b><br>14. Ensure everyone has access to a decent home that they can afford and which meets their needs, ensuring that best use is made of the existing housing stock | <ul style="list-style-type: none"> <li>Provide enough homes that people can afford?</li> <li>Provide quality and flexible homes that meet people's needs?</li> <li>Ensure that best use is made of the existing housing stock?</li> <li>Will it contribute to meeting regional housing requirements?</li> </ul>  | <ul style="list-style-type: none"> <li>Household size</li> <li>No of affordable housing and social rented properties – CBC</li> <li>No of affordable homes enabled within borough boundary</li> <li>Number of people who are homeless</li> <li>Average house price to average income ratio</li> <li>Average house prices in Cheltenham</li> <li>Gross weekly pay</li> <li>Total number of new housing completions and % affordable</li> <li>No of dwellings that have been empty over 6 months</li> <li>No of second homes on council tax register</li> <li>NEW INDICATOR – average density of new housing?</li> </ul> |
| <b>GREEN SPACE</b><br>15. Protect and  | <ul style="list-style-type: none"> <li>Ensure existing open spaces, gardens and allotments are</li> </ul>  | <ul style="list-style-type: none"> <li>No allotment plots</li> </ul>   |

| Sustainability Objective (Stage A4)   | Decision Aiding Questions Will the SPD...  | Potential Detailed Indicators   |
|---|--|---|
| enhance open spaces, gardens and allotments for leisure and recreation, including creating opportunities for wildlife and local food production | <p>protected and enhanced?</p> <ul style="list-style-type: none"> <li>• Support the provision of new green space which includes opportunities for wildlife and local food production and improved access for recreation and leisure?</li> <li>• Integrate SUDS into green space?</li> <li>• Protect private green spaces if possible?</li> </ul> | <ul style="list-style-type: none"> <li>• % tenanted allotments</li> <li>• % of housing anticipated on garden land</li> <li>• Green space available</li> <li>• NEW INDICATORS? – Proximity to green space, net loss/increase in open space?</li> </ul> |

## 5 Alternatives

- 5.1 It is an important component of the SA to consider what the relative sustainability implications would be of pursuing an alternative approach to controlling the development on garden land and infill sites in Cheltenham.
- 5.2 The decision was made to proceed with producing Garden Land SPD. The main alternatives would be not to produce the SPD, and rely entirely on the saved policies of the Local Plan and other planning guidance documents to deliver development that does not harm the character of these areas.
- 5.3 However, this alternate approach would not provide the potential benefits to delivering sustainable development that are provided by preparing this dedicated SPD. This document also has some weight in terms of making decision on applications and setting standards developers should aim to meet.
- 5.4 A significant, although not great, proportion of housing development comes forward every year on garden land sites. With statistics show that:
- in 2007/2008, 117 of the permitted housing applications 22 were on garden land, a total of 30 dwellings of a total 289 permitted
  - so far in 2008/2009, 8 of the 60 housing applications given permission were on garden land, this is 12 dwellings of a total 507.
- 5.5 This equates to around 2-10% of total numbers of permissions for new dwellings per year. Therefore, controls and guidance need to be developed to avoid adverse impacts on the character of Cheltenham. To date many of the applications on this type of site have not been of a sufficient quality to reassure the planning committee that development would not lead to unacceptable harm of garden sites. This has led to some appeals where permission has often been permitted.
- 5.6 Therefore, preparing a specially tailored guidance will help provide the information necessary for applicants, decision makers and others on the evidence a development proposed on garden land would have to provide.

This is in order to prove character matters have been fully taken into consideration as part the design of development in its setting and built form.

- 5.7 The SPD can provide an invaluable tool for local authority planners by helping provide a tool by which they can show what is expected from development in the area, lending weight to arguments for refusal where development is of poor quality.
- 5.8 The approach can also save the time taken for applications to receive permissions or final refusal. This is by providing one set of guidance that planning officers and council members are signed up to, and hopefully getting better quality applications. It may therefore the application process run more smoothly, as all parties are clear in the expectations for development and how this is presented as part of an application. This may help in the delivery of homes to meet needs in Cheltenham.

## 6 Sustainability appraisal general comments

- 6.1 In order to thoroughly assess the impacts of the SPD on delivering sustainable development the sustainability appraisal (SA) assesses:
- the coverage of issues in the SPD relating to sustainable development
  - how clearly the guidance in the SA is presented.
- 6.2 This section addresses the clarity and usability of the guidance of the SPD.
- 6.3 In order for any sustainability benefits to be realised from this SPD it will need to be ensured that the guidance is set out in a way that is sufficient to allow those using the SPD to get a clear understanding of how development should proceed and to what standards. If the SPD is not successful in this, even where there are good intentions to achieve more sustainable development, the benefits will not be realised.
- 6.4 The SPD does set out a useful set of tools by which the character of garden land sites can be assessed and then how new development should be designed to complement this. The SPD contains many elements that will help new developments coming forward have less adverse impact on the character of existing residential areas and their gardens.
- 6.5 The SA does raise some matters that the SPD could have considered in preparing the SPD. The majority of these matters, although raised at the SA of the draft SPD stage, remain unresolved in the final version. This does not mean that the SPD will not deliver sustainable development, simply that the SPD may not be as clear and usable as it could be.
- 6.6 **Focus of the document:** One of the difficulties of this document is understanding the role it will play in delivering development. For the most

part the SPD focuses only on issues related to the design and layout of new development on garden and infill land so that it fits in with the character of the existing residential areas and does not harm amenity. However, it also covers two other specific issues – provision of play space, and water run-off.

- 6.7 The addition of these two specific issues, run-off and play, could cause some confusion over the role of the SPD. It is not clear why other issues have not been included that also relate to delivering higher quality and sustainable development. This could include:
- use of building orientation for passive solar gain
  - use of sustainable construction materials
  - water and energy efficiency
  - use of renewable energy
  - specific biodiversity enhancement
  - infrastructure delivery
  - planning contributions/obligations.
- 6.8 The SPD does reference the need for aspects of these to be part of the considerations in determining applications (paragraph 4.1 of the SPD). However, these are not specifically identified as issues in Box 7 'Factors affecting the determination of applications'.
- 6.9 It may be preferable to focus the SPD on context and character appraisal and the design response issues only. Leaving all other issues for separate policy or SPD. For instance, water run-off that is already addressed in separate Supplementary Planning Guidance (SPG) 'Sustainable Drainage Systems' (2003) and the Strategic Flood Risk Assessment, and play in an SPG titled 'Play Space in Residential Development' (2004).
- 6.10 The SA suggests this more focused approach is more likely to lead to positive outcomes for sustainable development, as it will more clearly demonstrate to applicants that this SPD is not the only document they should go to for advice on delivering high quality new development, and it is not comprehensive. It should also help avoid potentially conflicting repetitious advice.
- 6.11 However, in this appraisal the assumption has been made that the SPD is intended only really to focus on character, design and amenity, and it is not intended to address other matters. These are covered by separate policy and guidance, therefore, their omission does have a sustainable impact as it will be addressed under other considerations.
- 6.12 **Repetition of content:** It may be important for the SPD to reduce the repetition within the document as much as possible. For instance, the importance of character and the testing criteria are repeated, in slightly differing forms, in various section of the SPD. Keeping the content as

succinct as possible avoiding repetition should help provide a clear picture of what is anticipated from development.

- 6.13 A reason that clarity of wording, and clear purpose of sections, is important for sustainable development is that it reduces ambiguity. Presenting ambiguous statements can provide too much room for interpretation and negotiation. Thereby, potentially adversely affecting delivery of development that really meets the objectives for the area.
- 6.14 **The criteria:** A very large part of the SPD is the criteria to be used in assessing character and how this relates to the design of new development. The SA recognises these criteria as a very functional tool for demonstrating as a type of checklist the matters that need to be taken into account in development.
- 6.15 To improve the clarity of these criteria and the specific 'assessment criteria' questions, the SA suggests adding some greater differentiation between those that relate to existing character, and those on the design of new development. The purpose would be to clarify the flow between assessing character and then designing development as a response.
- 6.16 There are also a lot of criteria, making the task of following all quite onerous and leading to inevitable overlap. The SA supports the very thorough approach to setting these criteria. However, it may be possible to refine this list, checking for issues that could better be covered through a combined approach, or subsumed into a single criteria. This may improve the clarity of the tasks that should be completed to demonstrate compliance with the guidance and present the guidance in a way that may appear less onerous to applicants.
- 6.17 For instance, the matters that are important in designing a driveway, are also the matters that are important in retaining landscape character, and architectural style, with impacts of people covered by amenity matters, meaning there is no need for this specific question.
- 6.18 Reducing the complexity of some assessment criteria may also help improve how implementable these are. For instance through avoiding using multi-query criteria, where aspects could be better addressed elsewhere.

## 7 Sustainability appraisal of SPD content

- 7.1 This section looks at how the content of the SPD responds to each of the sustainability objectives selected for use in the appraisal.
- 7.2 The matrices take each of the objectives in turn and consider how the SPD could help move towards, or detract from, meeting the objectives. The matrices contain:
- the sustainability objective

- a summary of how the issues is addressed in the SPD, includes reference to 'assessment criteria', where relevant
- a commentary on the how the SPD relates to achieving the sustainability objective, including possible mechanisms for impacts
- a brief summary of impacts.

7.3 It should be noted that the appraisal of the SPD assumes that it will be successful in delivering development in garden sites and infill plots at a similar rate to past trends (notwithstanding market downturn). However, this development will be of a higher quality than before, led by the SPD, better respecting local context, protecting amenity and contributing to the urban environment of Cheltenham.

|   |  |   |
|---|--|---|
| <p><b>Biodiversity</b></p> <p>Protect, restore, creation and enhance habitats, species and sites of wildlife or geological interest</p> |  | <p><b>Potential for adverse impact – site specific mitigation necessary</b></p> |
| <p><i>Background</i></p>  | <p>Back garden land can play a significant role in supporting urban wildlife. This includes the role of individual mature trees, shrubs, ponds and areas of vegetation that provide the habitat for a range of species. Back gardens also provide green routes for wildlife to move through towns, linking to the surrounding countryside and other urban habitat patches.</p> <p>The Biodiversity Audit (2008) indicates the importance of urban land for biodiversity, including parks and gardens and other areas of green land within built-up areas.</p>  |   |
| <p><i>SPD coverage:</i></p>   | <p>The assessment criteria ‘townscape and natural environment significance’, addresses biodiversity, raising the need for a Phase 1 Habitat Survey and mitigation where necessary.</p>   |   |
| <p><i>SA comment</i></p>  | <p>Biodiversity is listed as an important component of character related to ‘landscape’. Biodiversity is identified as an issues of environmental significance with a question established to ensure that biodiversity considerations are part of the identification of context for development. This notes the role gardens can have for wildlife, including for legally protected species, wildlife corridor movement routes for wildlife in urban areas and Green Infrastructure.</p> <p>It may be suitable to clarify that landscape and biodiversity protection are not necessarily compatible, for instance some types of planting having very little nature conservation value and some areas of nature conservation value do not add to landscape quality. Biodiversity may also not relate well to ‘spaciousness’, depending on the definition used, as natural habitat features, such as trees and bushes can lead help a feeling enclosure, and large expanses of grass can often have very little biodiversity interest.</p> |   |

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| <i>Summary</i> | <p>There remains the potential for new garden land development to adversely impact the biodiversity value of sites. It will be important to ensure, wherever possible, that a habitat survey has been undertaken of these sites and mitigation measures put in place where a development may adversely impact on the wildlife function of the site. This will include loss of individual features of importance such as mature trees, and also the function of the gardens in supporting wildlife in of the wider area.</p> <p>The SA suggests a separate assessment criteria is included specifically related to biodiversity issues.</p> |
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|--|---|
| <p><b>Climate Change</b></p> <p>Reduce carbon emissions, striving for a carbon natural borough</p> <p>Improve the resilience of people, business and the environment to the inevitable consequences of climate change.</p> | <p><b>Potential for positive impact – although the SA recommends additional criteria</b></p>  |
| <i>Background</i>  | <p>CO<sub>2</sub> emissions for Cheltenham are lower than regional and national averages, but industrial and commercial emissions are rising and are at an unsustainable level. The UK has a national target to reduce CO<sub>2</sub> emissions by 60% by 2050. The regional initiative ‘Fair shares, fair choice’ has set a target for 2007 to reduce CO<sub>2</sub> emissions to 4.2 tonnes per person.</p> |
| <i>SPD coverage:</i>   | <p>Climate change is a very wide ranging issue so matters related to mitigation and adaptation are part of several aspects of the SPD, although it is not referred to directly. These are:</p> <ul style="list-style-type: none"> <li>• townscape and natural environmental significance and the protection of trees</li> <li>• water run-off management to reduce flood risk.</li> </ul>                     |

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|--------------------------|---|
| <p><i>SA comment</i></p> | <p>The SPD is likely to have a generally positive impact on climate change through:</p> <ul style="list-style-type: none"> <li>• encouraging development in accessible locations that reduces the need to travel by car, helping reduce CO<sub>2</sub> emissions</li> <li>• protecting mature trees from harm, that may have an important function in absorbing CO<sub>2</sub> and reducing heat island effects through shading and heat adsorption</li> <li>• stipulating water run-off requirements, which should help ensure that development on these sites does not increase the risk of flooding on or off-site, this is particularly important with a changing climate and increased rainfall</li> </ul> <p>The role of gardens as a wildlife movement corridor is noted in the explanation of Question C2. With a changing climate species will need to be able to move to adapt to a changing climate, providing linked habitats is essential to this.</p> <p>An additional matter which could be covered in addition to help adapt to a changing climate is the role of gardens in reducing the urban heat island effect caused by prolonged periods of high summer temperatures, more likely as a result of climate change. The shading and heat absorption provided by vegetation, rather than hard landscaped surfaces and buildings, can make a significant contribution in lowering temperatures in urban micro-climates. Therefore, this SPD could refer to the need to maintain green spaces for these reasons, as well as for protecting the general character.</p> |
| <p><i>Summary</i></p>    | <p>The SPD is likely to have broadly positive implications for climate change mitigation and adaptation, within the limitations of matters that are intended to be covered by the guidance.</p> <p>More detailed matters on improving energy efficiency of buildings, flood protection, building design and renewables will be covered in Local Plan policy, emerging LDF policy and other SPG and SPD.</p>   |

| <b>Water</b><br>Manage and reduce flood risk and surface water run-off |  | <b>Potential positive impact</b> |
|--|--|----------------------------------|
| <i>Background</i>  | <p>Cheltenham has over 4000 properties at risk from flooding and many existing urban drainage systems cause further problems of flooding, pollution or damage to the environment. As the climate changes serious flooding is likely to become a more frequent event and the current 1 in 100 yr flood risk will occur more often. Information is not available from the Environment Agency regarding surface water runoff and groundwater flooding but recent experience shows that existing drainage systems and flood attenuation schemes will not be able to cope.</p> <p>Flood risk maps related to climate change have been prepared for Cheltenham as part of the Gloucestershire Strategic Flood Risk Assessment.</p> |                                  |
| <i>SPD coverage:</i>   | <p>The importance of flood is raised in the discussion of relevant policy.</p> <p>A specific assessment criteria addresses water run-off, with the purpose of reducing surface water run-off that may result from a change from garden land to hard surfaces. The explanation and requirements for question W1 includes setting out the need to undertake flood risk assessment of proposed development sites.</p>   |                                  |
| <i>SA comment</i>  | <p>Water run-off issues are one of the few matters the SPD covers other than character. The provision of the assessment criteria may help reduce run-off rates, although to help ensure this it should include specifics on the run-off rates that should be applied and the type of sustainable drainage management that should be used.</p>  |                                  |
| <i>Summary</i>   | <p>The SPD may have a positive impact on reducing risks of flood. However, it may be unnecessary to include this matter in this SPD and rely instead on specific flood related SPD.</p>  |                                  |

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| <p><b>Transport</b></p> <p>Reduce the need to travel.</p> | <p><b>Potential for some positive impacts – although negligible</b></p>  |
| <p><i>Background</i></p>                                  | <p>Steady increase in people using bicycles; well above regional and national averages. The percentage of people walking to work reached 17% in 2000-02, but has fallen since, although still above average. The usage of public transport to get to work has dropped continually since 1998 and is well below national average. Overall use of alternatives to the car is high.</p> <p>Percentage of people using alternatives to the car for travelling to work has remained stable, with above average cycling and walking levels, although public transport use is low.</p> <p>Traffic volumes generally increasing</p>          |
| <p><i>SPD coverage:</i></p>                               | <p>The SPD covers issues such as car access to development directly, with advice on how to integrate driveways into the development and provide for parking. The SPD must consider these matters as they can have an influence on the character of development. However, they will not help in reducing car use.</p> <p>The assessment criteria relating to ‘activity’ covers some matters relating to promoting greater pedestrian access.</p> <p>However, the SPD as a whole sets an approach for new urban infill development, helping to promote greater access by non-car modes.</p>  |
| <p><i>SA comment</i></p>                                  | <p>The main impact the SPD is likely to have in relation to transport is maintaining a supply of housing coming forward within the urban area. This is likely to have a positive relationship with reducing the need to travel, as people in these new housing should have access to the existing services, jobs, schools, shops etc. that exist Cheltenham’s urban area.</p> <p>Specific matters covered in assessment criteria on ‘activity’ may help in making sure new development is designed to take into account existing movement routes, and promoting direct routes to access services, this can help promote walking.</p> |

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| <i>Summary</i> | The SPD may have a positive impact on reducing the need to travel. However, to achieve maximum benefits will be more reliant on matters covered through other aspects of the LDF and other strategies, including provision of jobs, community services and public transport. |
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| <p><b>Land resources</b></p> <p>Maximise appropriate reuse of previously developed land</p> <p>Minimise development of open land and green spaces within Cheltenham</p> <p>Protect and enhance the unique setting and landscape character of Cheltenham</p> |  | <p><b>Potential for both positive and negative impacts</b></p> |
| <i>Background</i>   | Almost all development has been occurring on vacant, underused or disused sites, the reducing availability of such sites is leading to increasing pressures on gardens (although these are also classed in PPS3 as previously developed) and increasing densities of development.  |  |
| <i>SPD coverage:</i>  | The SPD has a very strong relationship with land resources, by setting out the way that garden land can be used for development that does not harm character.  |  |
| <i>SA comment</i>   | <p>It is important to note that garden land (unless it is a paddock or field) is classed as previously developed land. Therefore, this SPD promotes use of this land in a way that helps improve density in urban areas that can lead to a greater population to support services and have access to the range of services and jobs provided in the town.</p> <p>More development focused within the town itself may help reduce the quantity of land needed for housing in out-of-town greenfield locations. This may help protect the AONB setting of Cheltenham</p> <p>The SPD goes some way to protecting the 'green spaces' of Cheltenham, as far as they relate to character. However, this does not necessary include the other roles of green space, for example taking into consideration the importance of even private areas for leisure, play, growing food or play.</p> |  |
| <i>Summary</i>  | The SPD may have some positive impacts to these objectives by promoting the efficient use of land in urban areas for development. However, there may also be some more negative effects as it permits development that is in keeping with the character of the area, but not necessarily keeps green space for other purposes.   |  |

| <b>Built Environment</b>  |  | <b>Potential for positive impacts</b> |
|---|--|---------------------------------------|
| Protect and enhance Cheltenham's distinctive townscape quality. |  |                                       |
| <i>Background</i>   | <p>% of land designated as conservation area has remained static since 01/02. Most areas have character appraisals but only 16.5% have management proposals. Cheltenham has a high number of listed buildings.</p> <p>Conservation area appraisals reveal the important contribution that greenspace, including private gardens, make to the built and historic character of the Borough.</p>  |                                       |
| <i>SPD coverage:</i>  | <p>Setting out measures to protect the character of the built environment is one of the main roles of the SPD. The majority of the assessment criteria have some relationship with how to defined the character of the urban area and then to show how garden land development responds to this.</p>   |                                       |
| <i>SA comment</i>   | <p>There may be an inevitable impact on the built environment from new development on garden land, as this SPD does not preclude this type of development proceeding. However, the SPD does seek to make sure that these impacts do not harm the overall character the built environment, and new development can enhance areas of lower quality.</p> <p>The SPD specifically includes guidance on how to take the age and architectural quality of the built environment into account in the design of new infill development. This includes the need to ensure development in Conservation Areas respects the quality and character of these areas. The SPD cross-refers to the need for development in these locations to use the relevant guidance in conservation areas management plans and appraisals, many of which have been adopted as SPD. It may also be suitable for the SPD to note the importance of the wider heritage of Cheltenham, protecting locally important buildings and areas where this is suitable.</p> |                                       |
| <i>Summary</i>  | <p>The SPD is likely to be useful in controlling the impact of new garden land infill development on built environment. This is by demonstrating to developers how to make sure their proposed development respects and responds to the context and character of the area.</p>   |                                       |

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| <b>Pollution</b>   |  | <b>Unlikely to be any impacts</b> |
| Improve air and soil quality and reduce noise and light pollution and the amount of contaminated land. |  |                                   |
| <i>Background</i>  | Light pollution has increased from 1993 to 2000 and Cheltenham is now classified as saturated.   |                                   |
| <i>SPD coverage:</i>   | The SPD does not relate very strongly to this issue and it is not specifically addressed   |                                   |
| <i>SA comment</i>  | This sustainability objective relates to pollution issues that this SPD does not, and are perhaps not suitable to address through the SPD. However, it may be suitable for the SPD to ensure that new lighting in garden land, particularly on back garden sites, is designed to high quality standards, to help protect the relative darkness of these areas and reduce energy demands. |                                   |
| <i>Summary</i>   | The SPD is unlikely to have any substantial impact on these matters.   |                                   |

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| <b>Employment land and premises</b>   |  | <b>Potential for positive impact – although negligible</b> |
| Ensure the availability of land the premises to secure the future prosperity of Cheltenham. |  |  |
| <i>Background</i>   | 14.59 ha of employment land have been lost since 1991.   |  |
| <i>SPD coverage:</i>  | The SPD does not directly address issues of employment land, as its focus is on housing land delivery in residential areas.  |  |
| <i>SA comment</i>   | The SPD sets out an approach to housing delivery on garden land and infill sites. If these types of site are delivered it may help reduce pressure on other urban locations to deliver the 6500 new homes needed in urban Cheltenham. Therefore, this could help protect existing employment sites from being redeveloped for housing, helping protect access to jobs in the town. |  |
| <i>Summary</i>  | The SPD has the potential to reduce pressure on redeveloped of urban employment sites for residential development, but enabling development in other urban locations.  |  |

| <b>Social equity</b>  |  | <b>Potential for positive impact</b> |
|---|--|--------------------------------------|
| Promote more inclusive and self-contained communities to reduce the need to travel for everyday requirements. |  |                                      |
| <i>Background</i>   | <p>The matters covered under this issue are very similar to those addressed in travel and transport, housing and climate change.</p> <p>Percentage of people using alternatives to the car for travelling to work has remained stable, with above average cycling and walking levels, although public transport use is low.</p> <p>Property prices doubled in the space of five years (2000-6), but dropped slightly in 2007. They are still above the national average, although the gap is reducing. This has created a serious problem of affordability. This lack of affordability remains despite the current fall in prices.</p>   |                                      |
| <i>SPD coverage:</i>  | The SPD does not directly include any section on 'social equity'. However, criteria related to protecting amenity, and that the SPD should aid the delivery of housing, should help promote equity in this type of development.  |                                      |
| <i>SA comment</i>   | <p>The assessment criteria relating to 'activity' covers some matters relating to promoting greater pedestrian access.</p> <p>Issues of 'amenity' in the SPD should help to protect any one group or community from inequitable impact from garden land development, by making sure that new development is a high quality that complements and enhances the 'liveability' of neighbourhoods.</p> <p>Provision of homes through the SPD can also help equity in terms of access to housing.</p> <p>However, the SPD as a whole, sets an approach for new urban infill development rather than peripheral development on the urban edge. This should help to promote greater access that is not reliant on car ownership and use.</p> |                                      |
| <i>Summary</i>  | The SPD seeks to deliver development in infill and garden plots that does not cause any harm to amenity, by making sure amenity is not harmed and no one group suffers inequitably because of this type of development. It also should help in the delivery of new homes in accessible, urban, locations. This should help in delivering aspects of greater social equity.   |                                      |

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| <p><b>Health</b></p> <p>Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities.</p> | <p><b>Potential for adverse impacts – mitigation necessary</b></p>  |
| <p><i>Background</i></p>  | <p>This sustainability objective relates to a number of different aspects of sustainable development. Helping to deliver a healthy place needs not only good access to health facilities, but also creating healthy neighbourhoods, including:</p> <ul style="list-style-type: none"> <li>• with access to spaces for formal and informal recreation</li> <li>• access to children’s play space</li> <li>• high quality local amenity</li> <li>• having green open spaces that help relaxation and wellbeing</li> <li>• routes to support safe walking and cycling</li> <li>• avoiding pollution impacts, including air and noise.</li> </ul> <p>There may also be a link with access to space to grow food, the number of allotment plots has steadily decreased over the accounted period, reflecting a drop in usage and the development of some allotment plots. However, allotments available are being increasingly well utilised, reflecting growing demand.</p> |
| <p><i>SPD coverage:</i></p>   | <p>The SPD does not directly include any section addressing health. However, criteria related to protecting amenity and encourage good access to new garden land development by alternatives to the car relate to creating a healthy environment.</p>   |
| <p><i>SA comment</i></p>  | <p>Implementation of the SPD may result in the loss of some garden space in existing homes in Cheltenham. There is the risk that this loss of private outdoor space may adversely impact on the quality of the some areas as green spaces for relaxing in, spaces for children’s play and potentially the use of gardens for growing food.</p> <p>However, provisions in the SPD should help in making sure these impacts can be mitigated against, or avoided, to as great extent as possible. This includes ‘activity’ and making sure new development is well-</p>   |

|                |  |
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|                | <p>linked to existing street patterns, to help encourage walking and cycling. Amenity criteria should help in protecting people from direct harm from new garden land development, including provision of amenity space. However, this does not address the need to protect the amenity space of existing homes. Provisions for play-space should help make sure new development makes proper provision for children.</p>  |
| <i>Summary</i> | <p>There is the risk that development in these locations could adversely impact on the availability of private outdoor space that contributes to a health lifestyle, including places for informal recreation, relaxation, children's play and growing food.</p> <p>Provisions of the SPD should help reduce and avoid these impacts, and should help in implementing high quality development. As part of protecting amenity criteria are included on ensuring the current value of garden land is taken into consideration in making decisions, so that no existing homes are left with gardens that reduce residents wellbeing.</p> |

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| <p><b>Housing</b></p> <p>Ensure everyone has access to a decent home that they can afford and which meets their needs, ensuring that the best use is made of the existing housing stock.</p> | <p><b>Impacts difficult to predict - due to uncertainty over quantity of housing to be delivered</b></p>   |
| <p><i>Background</i></p>   | <p>A steady decrease in the average household size which leads to increased demands on the housing stock.</p> <p>Household size in Cheltenham is below national and regional averages.</p> <p>The number of affordable homes is decreasing, largely due to the right to buy. There has been a drop of nearly 800 units since 2001, averaging 115 per annum. Loss from 'right to buy' well exceeds the number of new homes being built. In 03/04 there was an increase in affordable housing provision, and a decrease in the years after until 2006/07. Averages 75 units per annum provided. In 2006/07 only 9% of new homes were built as affordable.</p> <p>The number of homeless increased steadily up to 2004/05. There has been some improvement since then, but still over 3 times the number in 1998/9.</p> <p>Property prices doubled in the space of five years (2000-6), but dropped slightly in 2007. They are still above the national average, although the gap is reducing. This has created a serious problem of affordability. This lack of affordability remains despite the current fall in prices.</p> <p>Housing permission figures show that for 07/08 10% of homes given permission were on garden (although this is only 2% in 08/09 (so far)).</p> |
| <p><i>SPD coverage:</i></p>  | <p>The SPD directly relates to controlling how new homes on garden land and infill plots are delivered.</p>  |

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| <i>SA comment</i> | <p>It is not clear how much impact the SPD will have on the number of new homes that are delivered on garden land. At the moment this type of supply is somewhere between 2 and 10% of the total annual supply of housing permissions each year (although this does not necessarily relate to the number that are actually built). This proportion is not very significant in terms of overall supply. It may be that the SPD restricts supply of housing in these locations, as no new development can be shown to be meeting the standards set through the guidance. Therefore, adversely impacting on housing delivery and provision of new homes.</p> <p>However, it may be that the SPD helps the efficiency and smooth movement of applications for garden land development through the planning application process. This would be by helping initial applications to be of a higher standard, with greater agreement between officers and elected members over what comprises a 'good' development in these locations. Therefore, helping to deliver more housing in these locations.</p> <p>Whether the SPD will help the delivery of affordable homes is not clear, as this will be covered through separate policy on affordable housing. However, it is likely that garden land development will only be small sites and therefore not meet policy thresholds for affordable housing.</p> |
| <i>Summary</i>    | <p>Identifying the exact impact of the SPD on delivery of new housing, for instance whether it will facilitate the delivery resulting in more homes, or constrain delivery resulting in fewer, is difficult to determine. Therefore, impacts are difficult to predict.</p>  |

|   |  |
|---|--|
| <p><b>Green Space</b></p> <p>Protect and enhance open spaces, gardens and allotments for leisure and recreation, including creating opportunities for wildlife and local food production.</p> | <p><b>Potential for adverse impacts – mitigation necessary</b></p>   |
| <i>Background</i>   | <p>The number of allotments has been decreasing steadily, but demand for allotments is growing. Provision of land for growing local food is an important element in sustainable living.</p> <p>Studies are also underway looking at green space and the needs in Cheltenham. Play space SPG already exists for Cheltenham.</p> |
| <i>SPD coverage:</i>  | <p>The green space sustainability objective is closely related to the SPD, as it seeks to protect and enhance</p>  |

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|--------------------------|--|
|                          | <p>gardens for leisure and recreation.</p> <p>The sections on 'townscape and natural environment significance', 'layout and development patterns', 'amenity' and 'play space' all address aspects of green space protection.</p>   |
| <p><i>SA comment</i></p> | <p>This objective shares much in common with those on 'biodiversity', 'land resources' and 'health'. Many of the issues the SA raises for those issues will also be applicable here.</p> <p>As this SPD directly relates to development on garden land there will be negative implications against meeting this objective in full, as it does not seek to protect garden sites. However, the SPD should help to make sure that development delivered in these locations is as high quality as possible and takes into consideration impacts on biodiversity and amenity.</p> <p>The criteria in the SPD do focus more on the quality of the green spaces that are created, and remain. However, the emphasis is mainly related to visual character and 'spaciousness', rather than the quantity.</p> |
| <p><i>Summary</i></p>    | <p>The impacts against this objective is likely to be negative in terms of total quantity of garden land. However, the SPD should help make sure some of the quality remains.</p> <p>The SA suggests the need for greater consideration be given to the existing use of garden land, and making sure existing residents access to informal and formal recreation spaces is not harmed through new garden land development.</p>   |

## 8 Summary

- 8.1 There is much in the Garden Land Supplementary Planning Document (SPD) that is positive for sustainable development. The remit of the SPD is limited so that its focus is on design, character and amenity issues. This means that it has no relationship with much of the sustainability agenda, including issues such as natural resource use and economic development.
- 8.2 Therefore, the sustainability appraisal (SA) has been focused down to those issues to which the SPD should be aiming to address. Using the scoping stage of the SA of the Core Strategy as a starting point, this SA has picked out those sustainability issues relevant to the SPD. The process included refining the sustainability framework to only include those objectives that relate to the SA of the Garden Land SPD, and the defined role and function of this SPD.
- 8.3 This SA is of the final SPD, therefore the issues it raises are those that are unresolved in moving from the draft to final versions. They are therefore those that may need monitoring in the implementation of the SPD to verify if it is having an impact on contributing to sustainable development.

|     |  |
|-----|--|
| 1.  | <b>Biodiversity:</b> Protect, restore, create and enhance habitats, species and sites of wildlife or geological interest   |
| 2.  | <b>Climate change:</b> Reduce carbon emissions, striving for a carbon neutral Borough.   |
| 3.  | <b>Climate change:</b> Improve the resilience of people, businesses and the environment to the inevitable consequences of climate change                                   |
| 4.  | <b>Flood:</b> Manage and reduce flood risk and surface water run-off   |
| 5.  | <b>Transport:</b> Reduce the need to travel  |
| 6.  | <b>Land resources:</b> Maximise appropriate reuse of previously developed land   |
| 7.  | <b>Land resources:</b> Minimise development of open land and green spaces within Cheltenham  |
| 8.  | <b>Land resources:</b> Protect and enhance the unique setting and landscape character of Cheltenham  |
| 9.  | <b>Built environment:</b> Protect and enhance Cheltenham's distinctive townscape quality and its historic heritage   |
| 10. | <b>Pollution:</b> Improve air and soil quality and reduce noise and light pollution and the amount of contaminated land  |
| 11. | <b>Employment and premises:</b> Ensure the availability of land and premises to secure the future prosperity of Cheltenham   |
| 12. | <b>Social and equity:</b> Promote more inclusive and self-contained communities to reduce the need to travel for everyday requirements                                     |
| 13. | <b>Health:</b> Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities                                    |
| 14. | <b>Housing:</b> Ensure everyone has access to a decent home that they can afford and which meets their needs, ensuring that best use is made of the existing housing stock |

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| <b>15.</b> | <b>Green space:</b> Protect and enhance open spaces, gardens and allotments for leisure and recreation, including creating opportunities for wildlife and local food production |
|------------|---|

- 8.4 The SA has considered what the sustainability implications of pursuing alternative approaches to development may be. The primary alternative was to not to prepare this SPD and instead relying on existing policy from the Local Plan.
- 8.5 The SA found that it is important to have this guidance on suitable garden land development in place in order to improve the quality of this type of development. Between 2 and 10% of housing development planning permissions (based on last two years permissions) in any one year are on garden land. Therefore, there are clear benefits to built character and amenity in Cheltenham by providing guidance on how this type of development can be delivered with least impact on character and amenity.
- 8.6 The SA does not really raise any issues of particular concern for sustainable development. The SPD is likely to have mainly positive implications in relation to creating a better environment. However, some matters such as impacts on biodiversity, landscape, flood and maintenance of accessible private greenspace, will need to be resolved on a site by site basis. This will need to include detailed site assessment for flood and ecology where necessary.
- 8.7 However, the SA does identify some matters that may have implications for sustainable development.
- 8.8 The SA raises some issues associated with the layout and future implementation of the SPD. This identifies potential problems of repetition in the guidance, the SA makes suggestions on the possibility of simplifying some of the 'assessment criteria' to avoid overlap. The purpose would be to avoid potential conflicts of advice and make the document clearer and more concise that could aid its implementation.
- 8.9 Similarly, the SA queries whether any issues other than character and amenity should be addressed in the SPD. Two sections that seem incongruous with the rest of the guidance are water run-off and play space. Again, to avoid repetition it may have been preferable to rely on the relevant Supplementary Planning Guidance that exist for these two issues. The SA believes that this would make the purpose of the SPD more readily apparent and highlight the importance of considering other policy and guidance in designing truly sustainable development.
- 8.10 **Impact on housing delivery:** It is not clear to what extent the introduction of the SDP would impact on the delivery of housing from this source. It is likely that the SDP would only serve to improve the housing that would happen anyway, to ensure it is designed of a higher quality and complements existing character. However, if it did significantly reduce delivery it could mean alternative sites for housing would have to be found in order to meet RSS requirements. This could transfer sustainability impacts

to different sites in Cheltenham, such as loss of other green space employment land. Without this there could be adverse impacts on the objective of providing everyone with a home to meet their needs.

- 8.11 Alternatively, the production of an SPD to which all parties have signed-up to, could aid the delivery of new homes on garden land, by making the application process run more smoothly. This could include better quality applications where officers and elected members can see how the development has been careful to respond and limit any harm to the garden land sites.
- 8.12 **Biodiversity:** Back garden land can play a significant role in supporting urban wildlife. This includes the role of individual mature trees, shrubs, ponds and areas of vegetation that provide the habitat for a range of species. Back gardens also provide green routes for wildlife to move through towns, linking to the surrounding countryside and other urban habitat patches.
- 8.13 The SPD identifies biodiversity as an issue of importance under the 'townscape and natural environment significance' heading. Integrating biodiversity with landscape issues to some extent. Combining these two issues is likely to be suitable in terms large areas of vegetation of mature trees and shrubs, as they will add clear landscape character to the area. However, biodiversity assets will not always be positive in terms of landscape character. For instance, areas of more unkempt garden, or small ponds, that add little to landscape character (and could detract from it) could be important for biodiversity.
- 8.14 Making sure ecological assessments and suitable mitigation are incorporated in designs of development will be essential to avoid adverse impacts on urban wildlife from garden land development and infill.
- 8.15 **Accessibility:** Concentration of housing in the urban area raises the opportunity for greater accessibility to jobs, shops and services and reducing the need and distance travelled by car. The SPD contains detail on the access points for new development but does not necessary promote the need for this type of development to promote access by walking and cycling, over car travel. Where suitable design criteria should seek to make sure that larger new back garden development makes use of pedestrian routes and pathways to link developments to the nearest local shops, schools etc.
- 8.16 **Other functions of gardens:** As previously addressed the SPD focuses on the character considerations of garden land, with some coverage of other issues including amenity. However, it does not address in any great detail the other roles of existing garden land. Biodiversity issues are covered in paragraphs 8.12 to 8.14 of this report and climate change in 8.20. However, other considerations with relevance to sustainable development are:
- The role of gardens as a private leisure and play space, and the need to ensure that sufficient quantities of amenity space remain for existing homes.

- The role of gardens for food production, with new garden land development potentially impacting on those who currently or may wish to grow their own food.
- 8.17 The SPD could also give greater emphasis to the existing use of gardens and how they will be effected by new development. This is in addition to their existing character, and the appearance of planned open spaces in new homes.
- 8.18 **The built and historic environment:** The SPD should help make sure that this type of development does not harm the built environment character of garden land. Thereby, protecting the built and historic heritage of Cheltenham. The guidance appears thorough in its coverage of issues, including details of the importance of sites or areas of local heritage importance.
- 8.19 **Water run-off and flooding:** The inclusion of the section on water run-off should help make sure that this type of development does not cause increased levels of run-off that exacerbate risk of flooding. New sustainable drainage and use of permeable surfaces should help reduce these risks.
- 8.20 **Climate change:** There is only a limited role of the SPD in addressing climate change. Reducing the need to travel by promoting more urban development with accessible services should help play a part in reducing CO<sub>2</sub> emissions from transport. Also, protecting urban wildlife and reducing water run-off can help in avoiding impacts. The SPD could make reference to the role of garden in reducing urban heat-island microclimates, through the shading and heat dissipation provided by vegetation.
- 8.21 The SA identifies that it may not be possible (or suitable) to specifically monitor the SPD. However, there may be particular important in monitoring in future how much development is coming forward on sites that can be defined as 'garden land', and the quantity of development that is refused based on the material considerations in this guidance. This should give an indication on whether this SPD is overly restricting the delivery of new homes that are necessary to meet RSS requirements.
- 8.22 Other monitoring provisions could include:
- Housing permission/completions on garden land – including area of land lost to built development
  - Number of garden land developments incorporating biodiversity mitigation measures
  - Number of garden land development sites that do not include sufficient private/semi-private open space or result in the loss of sufficient private/semi-private open space of existing properties – based on local policy guidelines.

Appendix 1

Responses to the scoping report

| <b>Respondent</b>  | <b>Ref</b> | <b>Comment</b>  | <b>SA Response</b>  |
|--------------------|------------|---|---|
| Environment Agency | SA1        | Lack of reference to river quality that is a key issues in Cheltenham. This should be identified in the Table 11 on the sustainability appraisal framework and as a key sustainability issue. | Water quality issues have not been included in the framework and issues relevant to the sustainability appraisal of this SPD. The reason for this is that the SPD is unlikely to have any influence over water quality. The focus is only on character and amenity of areas and not construction issues. However, the importance of this matter is noted, and planning policy on infrastructure delivery to avoid impacts on water quality will need to be included in the LDF. |
| Environment Agency | SA2        | Include indicators on water quality in Table 7A and Appendix 2  | Water quality issues have not been included in the monitoring framework for the sustainability appraisal of this SPD. The reason for this is that the SPD is unlikely to have any influence over water quality. The focus is only on character and amenity of areas and not construction issues. However, the importance of this matter is noted, and SA of the policy sections of the LDF should take into account impacts on water quality.                                   |
| Environment Agency | SA3        | The differentiation between the Table 7A, 7B and Appendix 2 is confusing. Further explanation could be added to improve the clarity of this.  | Appendix 2 of the scoping report was intended to show trend data, with Table 7A showing data for issues relevant to the sustainability appraisal of the SPD. Table 7B shows those issues that are relevant to the sustainability appraisal of the SPD.<br><br>In moving forward with the sustainability appraisal the process by which relevant issues were selected will be clarified. This will not repeat these tables from the scoping report.                              |
| Environment Agency | SA4        | Pleased with the inclusion of flood risk in the scoping report.   | Noted   |
| Environment        | SA5        | Recommend revising the SFRA to fill in missing  | Noted, these matters should be considered in moving   |

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|--------------------|------|---|--|
| Agency             |      | information on indicators on flood.   | forward with the LDF.  |
| Environment Agency | SA6  | key indicator in Appendix 2 “ <i>applications approved against EA advice</i> ” refers only to planning applications for major development approved against our advice on flood risk.  | The indicator will be amended so that it refers to major applications only.  |
| Environment Agency | SA7  | Support the approach to climate change as a cross-cutting issue.  | Noted  |
| Environment Agency | SA8  | <p>Waste matters have not been included within the <i>Table 10: Stage A4-Sustainability Objectives</i>. Development should seek to reduce the amount of waste going to landfill and be in accordance with the waste hierarchy. The Garden Land SPD could contain a policy on this. We would recommend that a question on this matter should be therefore included within the SEA/SA framework. Possible questions should be:</p> <p>Does the SPD reduce the amount of waste going to landfill?</p> <p>Does the SPD allow for the re-use of materials on-site?</p> | Reducing waste to landfill is a major issue for sustainable development. The reason for this is that the SPD is unlikely to have any influence over matters related to waste. The SPD only covers character and amenity of areas and not construction issues. However, the importance of this matter is noted, and planning policy on the form and requirements for new buildings will need to take into account sustainable construction practice and the need to make sure buildings have space for waste segregation and storage. |
| Environment Agency | SA9  | <p>Appendix 1</p> <p>We would recommend that the following plans are included in Appendix1:</p> <p>PPS25: Development and Flood Risk</p> <p>PPS23: Planning and Pollution Prevention</p> <p>PPS10: Planning for Sustainable Waste Management</p> <p>River Basin Management Plans</p>  | PPS25 will be included as a relevant plan or programme for the SA. However, as previously described the SPD will have no relationship with the actual sustainable construction of buildings, as it only covers character and amenity issues. Therefore, these other plans will not be included at this stage, but should be a consideration for the SA of other relevant parts of the LDF.   |
| Environment        | SA10 | Appendix 2 includes a map (figure 2) which relates  | Noted. This map will not be used in making decision  |

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| Agency             |      | to flooding in Cheltenham. This map may be out of date. We would advise you to use a map from the Gloucestershire SFRA which is the most current information available for Cheltenham Borough Council and also covers all types of flooding including surface and groundwater flooding. We would advise you use the map from the SFRA that include climate change as this is appropriate in strategic context and other sources of flooding. | about the suitability of development in different locations and this will need to be based on up-to-date information for each area – this will include using the Gloucestershire SFRA. |
| Environment Agency | SA11 | Please note as mentioned at the start of the letter, this response should be read in conjunction with a letter Ref. GCT-JCS_SASR-01 dated 23 January 2009 related to SEA/SA scoping report on the Joint Core strategy for Cheltenham, Gloucester and Tewkesbury.   | Noted. These matters relate most specifically to the SA of the Core Strategy and should be taken into account in SA of relevant LDF policy.  |

## **Appendix 2**

**Key plans and programmes and sustainability theme relevant  
to the sustainability appraisal of the SPD**

| Sustainability Theme  | Source/Evidence  |
|---|--|
| <b>1. Living within environmental limits (natural resource protection and enhancement)</b>  |  |
| <p><b>Biodiversity</b> – work with the grain of nature to protect the biodiversity asset of garden land and respect the value of biodiversity wherever it is found</p>  | <p>European Birds Directive, 1979<br/>           Convention of Biodiversity, 1992<br/>           European Habitats Directive, 1992<br/>           England Biodiversity Strategy, 2002 – 2006<br/>           PPS9: Biodiversity and Geological Conservation, 2005<br/>           SW Biodiversity Implementation Plan, 2004<br/>           South West Nature Map, 2007<br/>           emerging Regional Spatial Strategy, 2006<br/>           Gloucestershire Biodiversity Action Plan, 2000<br/> <i>Cheltenham Biodiversity Audit (2009)?</i></p> |
| <p><b>Climate change</b> – reduce carbon emissions through reducing the need to travel and reducing vulnerability to the impacts of climate change, helping to create a liveable urban environment in the future.</p> | <p>Kyoto Protocol, 1997<br/>           The Physical Science Basis, IPCC 2007<br/>           The Nottingham Declaration<br/>           Climate Change: The UK Programme, 2006<br/>           PPS1 Planning and Climate change<br/>           Planning and Climate Change Supplementary guidance to PPS1 2007<br/>           ‘Warming to the idea’ SW Climate Change Impacts Scoping Study, 2003<br/>           emerging Regional Spatial Strategy, 2006<br/>           Cheltenham Climate Change Strategy, 2005</p>                               |
| <p><b>Water</b> – do not enhance the risk of flood through managing surface water run-off</p>   | <p>2000/60 EU Water Framework Directive, 2000<br/>           PPS25: Development and Flood Risk, 2006<br/>           emerging Regional Spatial Strategy, 2006<br/>           SPG on SUDS</p>  |
| <p><b>Transport</b> – promote a safe, efficient and integrated transport system that reduces the need to travel and dependency on high carbon modes of transport, and improves reliability and accessibility</p>      | <p>PPS1: Planning and climate change<br/>           Draft Regional Spatial Strategy, 2006</p>  |
| <p><b>Land resources</b> – protect good quality land and soil, enhance sensitive and valued landscapes and encourage recycling of previously developed land and buildings</p>   | <p>Securing the Future: UK Government Strategy for Sustainable Development, 2005<br/>           emerging Regional Spatial Strategy, 2006</p>   |
| <p><b>Built environment</b> – encourage a safe, clean and attractive environment and protect, enhance and improve understanding of the historic and cultural heritage</p>   | <p>‘Towards an Urban Renaissance’ 1999<br/>           The Sustainable Communities Plan, 2003<br/>           PPG15: Planning and The Historic Environment, 1994<br/>           Strategy for the Historic Environment in the South West, 2004<br/>           emerging Regional Spatial Strategy, 2006<br/>           Conservation Area Character Appraisals and Management Plans</p>   |
| <p><b>Pollution</b> – reduce risks to health and the environment by reducing air and noise pollution and contaminated land</p>  | <p>The Urban Environment, 2007</p>   |
| <b>2. A sustainable economy (sustainable consumption and production)</b>  |  |

| <b>Sustainability Theme</b>  | <b>Source/Evidence</b>  |
|--|---|
| <p><b>Economic development</b> – encourage sustainable economic and tourism growth which ensures high quality employment opportunities, a skilled workforce and prosperity without harming environmental quality</p> | <p>Regional Economic Strategy For SW 2006<br/>emerging Regional Spatial Strategy, 2006<br/>Economic Development Strategy for Cheltenham, 2007</p>   |
| <p><b>3. A strong, healthy and just society (sustainable communities)</b></p>  |   |
| <p><b>Social cohesion</b> – reduce inequalities in health, education and learning, employment opportunities, crime and environmental quality and promote a more inclusive society, locally and globally</p>          | <p>A New Commitment to Neighbourhood Renewal, 2001<br/>The Sustainable Communities Plan, 2003<br/>Our Shared Future, 2007<br/>Creating Sustainable Communities In The South West, 2005<br/>emerging Regional Spatial Strategy, 2006</p>                                     |
| <p><b>Health</b> – improve mental and physical health and wellbeing through retaining access to public and private green spaces.</p>   |   |
| <p><b>Housing</b> – improve access to a wide choice of affordable and safe housing, especially for disadvantaged members of society, ensuring that best use is made of existing housing stock</p>                    | <p>The Sustainable Communities Plan, 2003<br/>PPS3: Housing, 2007 (DCLG)<br/>Creating Sustainable Communities In The South West, 2005<br/>South West Regional Housing Strategy, 2005<br/>emerging Regional Spatial Strategy, 2006<br/>Cheltenham Housing Strategy, 2005</p> |
| <p><b>Green space</b> – retain, create and enhance open spaces for recreation and sport to improve wellbeing</p>   | <p>PPG17: Planning For Open Space, Sport and Recreation, 2002<br/>emerging Regional Spatial Strategy, 2006</p>  |

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Appendix 3

Key sustainability issues relevant to the sustainability appraisal of the SPD

## Environment

| Key sustainability issues  | Evidence and trends   | Relationship to Garden Land SPD – carried forward in SA  |
|--|---|--|
| <p><b>Conservation Areas and Listed Buildings</b> – significant conservation area coverage and high numbers of listed buildings</p>                              | <p>% of land designated as conservation area has remained static since 01/02. Most areas have character appraisals but only 16.5% have management proposals. Cheltenham has a high number of listed buildings.</p>  | <p>Conservation area appraisals reveal the important contribution that greenspace, including private gardens, make to the built and historic character of the Borough. Therefore, this issues should be addressed in the SPD and needs to be included in the SA.</p>   |
| <p><b>Habitats</b> – small number of designated sites and very low area of SSSI's in favourable condition, decreasing numbers of trees on council owned land</p> | <p>Cheltenham has only one designated local nature reserve, covering 0.8ha, with six additional sites that were proposed several years ago, which would increase area to over 44 ha, but still significantly below national average. Tree numbers overall and the number of new/replacement trees on council-owned land have been decreasing steadily</p> | <p>The condition and lack of designated sites could have a major impact on the biodiversity and sustainability of wildlife habitats.</p> <p>Trees are important for absorbing CO2 and therefore combating climate change. They also have a cooling effect and provide areas of shade. Choice of species for replacing trees will be an important factor in ensuring they are resilient to climate change.</p> <p>Biodiversity is an essential consideration for the SPD and the SA, although garden sites are not designated for their nature conservation value they make a valuable contribution to the overall biodiversity assets of the area.</p>   |
| <p><b>Land designated as AONB or Green Belt</b> – plays an important role in protecting the unique setting and landscape character of Cheltenham</p>             | <p>Almost a third of the borough is covered by AONB status, forming part of the Cotswolds AONB, which is the largest AONB in the UK and almost a fifth of the borough is covered by the green belt separating Cheltenham, Gloucester and Bishops Cleeve</p>   | <p>The area of AONB and green belt within Cheltenham Borough is important for protecting the unique setting and landscape character of Cheltenham. It also provides sites for wildlife and recreational opportunities. Loss of this land could adversely affect the character of Cheltenham, impact on biodiversity and affect the quality of life of local people. Development on garden land may help protect this landscape asset, although the quantity of development coming forward on these sites are unlikely to make a significant contribution to overall housing requirements.</p> <p>This issue will be considered further in the SA, but the SPD is unlikely to have any significant implications for this.</p> |
| <p><b>Flooding</b> – significant risks from flooding, especially with changing climate</p>   | <p>Cheltenham has over 4000 properties at risk from flooding and many existing urban drainage systems cause further problems of flooding, pollution or damage to the environment. Information is not available from the Environment Agency regarding surface water runoff and</p>   | <p>As the climate changes serious flooding is likely to become a more frequent event and the current 1 in 100 yr flood risk will occur more often. More concentrated periods of heavy rainfall will also increase pressure on existing drainage systems, which may not be able to cope with the increased level of surface water runoff.</p>   |

| Key sustainability issues  | Evidence and trends   | Relationship to Garden Land SPD – carried forward in SA   |
|--|---|---|
|  | groundwater flooding but recent experience shows that existing drainage systems and flood attenuation schemes will not be able to cope.   | For the SPD it may be necessary to consider the changes that built development on garden land will make to run-off and surface water drainage, and the contribution this may make to flooding as well as groundwater.   |
| <b>Allotments</b> – growing demand for allotments, but number of sites is decreasing   | The number of allotments has been decreasing steadily, but demand for allotments is growing.  | Provision of land for growing local food is an important element in sustainable living. Allotments also provide important wildlife sites and help with flood attenuation.<br><br>The garden land SPD may need to set out if guidance is applicable to allotment sites (or covers private gardens only).   |
| <b>CO<sub>2</sub> emissions and carbon footprint</b> – electricity use and CO <sub>2</sub> emissions are rising, rather than falling in line with national targets. CO <sub>2</sub> emissions and electricity consumption within the business sector are increasing steadily | CO <sub>2</sub> emissions for Cheltenham are significantly lower than regional and national averages, because of the size of the borough and the type of industry found here, but overall our emissions are too high. | There is now global scientific consensus that CO <sub>2</sub> emissions from human activity are contributing to climate change and we need to stabilise emissions by 2015. The UK has a national target to reduce CO <sub>2</sub> emissions by 60% by 2050. The regional initiative 'Fair shares, fair choice' has set a target for 2007 to reduce CO <sub>2</sub> emissions to 4.2 tonnes per person. Focusing development on accessible locations in existing urban areas could help reduce the need to travel. |
| <b>Brownfield land</b> – high take-up means fewer sites available bringing pressures on garden areas, which impacts on quality of life, opportunities for food growing, wildlife and flooding  | The number of homes built on previously high has been high over recent years – data on garden land needed.  | Almost all development has been occurring on Brownfield sites, the reducing availability of such sites is leading to increasing pressures on garden areas and increasing densities of development, which may achieve smaller carbon footprints at the expense of residential amenity and biodiversity. However, development in these locations have an essential role in protecting green land. This is an essential matter for the SPD and the SA to take into account.  |

## Economy

| Key sustainability issues  | Evidence and trends  | Sustainability Consequences   |
|--|--|---|
| <b>Maintaining a strong economy</b> – need to ensure that new and existing businesses have opportunities to expand and develop sustainably | High ranking retail performance, increasing numbers of businesses, VAT registrations and new firms, high job density and containment rate indicating that there are lots of jobs for Cheltenham's working age population. While the manufacturing sector has declined, it is still above | A thriving economy enables a good choice of jobs for the working age population in Cheltenham; it can also encourage people to travel from further afield to take up jobs leading to either in-commuting or more pressures on the housing stock |

|   |   |   |
|---|---|---|
|   | average. Employment in tourism activities lags behind   |   |
| <b>Loss of employment land</b> – despite a thriving economy the amount of land used for employment purposes is declining                        | 14.59 ha of employment land have been lost since 1991   | If land is lost for employment purposes businesses seeking to expand will struggle to find suitable premises or land and new businesses may be diverted from the town. Development of housing on garden sites could help protect employment land and should be considered as part of the SA of the SPD.   |
| <b>Reinforcing the Town Centre</b> – ensuring that Cheltenham’s key role as a retail, service, leisure and learning destination is strengthened | Cheltenham has dropped in the national ranking of retail centres which, if it continues, could impact on the economic prosperity of the town. Cheltenham’s festivals make a significant contribution to annual business turnover and have wider positive impacts, enhancing the image of Cheltenham and helping to attract and retain new investment and employment | The town centre is a key public transport node and it is important that retail, service and leisure facilities are located within or close to the town centre to maximise use of public transport. Maintaining the vitality and viability of the town centre is key to ensuring the future prosperity of the town. Focused development in the urban area, including central Cheltenham, will help support the retain centre and may be a matter for consideration in the SA of the SPD. |

## Social

| Key Sustainability Issues  | Evidence and trends  | Sustainability consequences   |
|--|--|---|
| <b>Population</b> – growing slowly with most of increase in working age population. Fewer children could mean a smaller workforce in future. Number of households increasing | The population is increasing slowly, with most of the growth occurring in the working age population. Children and pensioners are slowly reducing as a proportion of the population, although their levels are still above national averages; household size steadily decreasing   | Decreasing house sizes means more single person households will need to be accommodated. Pressure on existing housing could increase and more affordable housing will be needed. The demand for more homes puts pressure on garden land for development.  |
| <b>Affordability</b> – house prices risen dramatically and fewer affordable homes available  | House prices doubled over 5 years, income levels have lagged behind, there are fewer affordable homes in Cheltenham, number of homeless increased dramatically since 1998/9, there have been fluctuating levels of new affordable housing provision generally averaging less than the number of units lost through right to buy. | Property prices have doubled in five years and the growing gap between salaries and house prices means that it is becoming increasingly difficult for people to move to or continue to live in the town. This could have consequences for the local economy as businesses may find it increasingly difficult to recruit staff. The lack of affordable housing could also lead to a greater daily in-migration of workers who have to live outside the area, which brings with it the associated problems of traffic congestion and its impact on climate change. The need for new housing may also put pressure on garden land for development. |
| <b>Deprivation</b> – nearly a tenth of households live in highly deprived  | Although Cheltenham is considered to be an affluent town, 9% of the population lives within highly deprived areas and  | Deprived areas have wide ranging issues including poor housing and health, poor local environment and low levels of economic activity and   |

|  |   |  |
|--|---|--|
| <p>areas, 16% children live in households on benefits</p>  | <p>nearly 16% of children live in low-income households. The most deprived wards in the borough are in central Cheltenham in St Paul's and Oakley ward, and on the western periphery.</p>   | <p>learning achievement.</p>   |
| <p><b>Transport</b> – increasing traffic volumes, cycling, walking and Park and Ride use high, but public transport is below average</p>   | <p>Park and Ride usage has increased dramatically, normal bus trips have been stable, percentage of people using alternatives to the car for travelling to work has remained stable and is above average, high levels of cycling and walking levels, above national average car ownership levels, traffic volumes generally increasing while accident rates relatively fluctuate, but stable overall</p>  | <p>Increasing traffic volumes add to congestion and climate change. Providing employment opportunities near to where people live would cut down the need to travel and make it easier to use other forms of transport such as cycling and walking, both of which have health benefits. Encouraging greater uptake of public transport is likely to depend on its affordability, especially in relation to the costs of running a car.</p>  |
| <p><b>Housing stock</b> – despite high levels of house building, little new housing is affordable and number of empty and second homes remains high. Cheltenham must meet its housing requirements set by the region, in order to deliver the homes it has been predicted are necessary to accommodate the existing population, population growth and people moving to the area.</p> | <p>Housing building rates increased dramatically in 2006/7, but only 9% affordable, number of empty homes remains high and number of second homes increasing.</p> <p>Past applications show that in 07/08 117 housing applications were permitted 22 of these were on rear gardens. This was a for a total of 289 dwellings and 30 of these were on rear gardens. In 2008/09 so far there were a total of 60 housing applications, 8 on rear gardens, giving a total of 507 dwellings and 12 on rear gardens.</p> | <p>Not enough affordable homes are being built and the level is unlikely to increase sufficiently to close the gap. Bringing empty homes back into use and discouraging the purchase of second homes, which inflates house prices, could help to bridge this gap and ensure better use is made of the existing stock in the borough.</p> <p>Rear garden land makes up a proportion of development every year, although this varies. In the two years given this was 10 and 2%.</p> |

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## **Appendix 4**

### **Comments and response to the Draft SPD Sustainability Appraisal Report**

| <b>Respondent</b>  | <b>Ref.</b> | <b>Respondent Comment</b>   | <b>Sustainability Appraisal response</b>   |
|--------------------|-------------|---|--|
| Environment Agency | SA1         | We are pleased that most of our comments were taken on board and were incorporated into the final report. We appreciate your explanation on some of our proposals that they have not been added into the SA report because they would not have had any impact on this SPD.  | Noted  |
| Environment Agency | SA2         | We are disappointed that the “Decision Aiding Question” on water quality was not included within SA framework. The reason you pointed out was that “ <i>the SPD is unlikely to have any influence over water quality</i> ”. While we can agree that this SPD will have no direct impact on water quality because the focus is only on character and amenity of areas and not construction issues, we would like to point out that the SPD supports landscaping and planting/ponds which itself help to reduce surface water pollution. The SPD also supports the reduction of surface water run-off from the garden land sites and this can be achieved by incorporating Sustainable Drainage System (SuDS). SuDS features such as soakaways, swales, reedbed, ponds etc. also provide surface water treatment. Therefore this SPD will have a positive impact on this issue and in our opinion this could have been highlighted within the Sustainability Appraisal. | It is agreed that the use of SuDS and creation of ponds is relevant to water quality issues. Also, we note that the EA comment that the SPD could have a positive impact on water quality. |
| Natural England    | SA3         | Section 1.5 of the Sustainability Appraisal (SA) states that the scope of the SPD is limited to character and amenity, and “character”, as defined by Box 5 of the SPD, makes no mention of habitats  | For the SA the issues of ‘landscape and natural features’ have been taken to include the natural environment including habitats. Therefore, including these matters as elements            |

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|                 |     | or biodiversity, only “natural features”. Sections 3.8 and 3.10 of the SA however, include local environment and habitats (and therefore biodiversity) as being elements of character. This is clearly inconsistent and a significant shortcoming of the SPD.  | of the appraisal was identified as necessary to ensure that new development is guided by the SPD to incorporate these elements of ‘character’. The SA is independent of the SPD and therefore should take an independent view of what character should encompass. It remains the suggestion of the SA that biodiversity and local environment should be part of the SPD considerations.   |
| Natural England | SA4 | Several elements both of the SPD and, more worryingly, the SA, that fail to adequately protect biodiversity.   | The issues of protecting biodiversity is raised through the SA. Including as: <ul style="list-style-type: none"> <li>• a key sustainability theme</li> <li>• a sustainability objective (and supporting decision aiding questions and indicators)</li> <li>• suggestions for further inclusion (6.7)</li> <li>• recommendations on including policy ‘hooks’ relating to biodiversity (6.13)</li> <li>• identified as an issue in Section 7 appraisal, identifying there is the potential for ‘possible adverse impact – mitigation necessary’ and making suggestions on further inclusion</li> <li>• suggestions in the summary on how to address biodiversity in the SPD.</li> </ul> |
| Natural England | SA5 | In the SA there are several comments which identify the importance garden land to biodiversity, including 3.8 and the matrix relating to biodiversity in 7.2 (which is colour coded dark amber), and yet section 8.5 of the summary states that there are no issues of particular concern, and that the SPD is likely to have mainly positive implications in relation to creating a better environment. | The SA would maintain that the overall impact of the SPD is unlikely to have a major adverse impact. However, it will be clarified that to achieve this impacts on biodiversity will need to be mitigated against or avoided through appropriate policy guidance.   |

|                  |     |   |  |
|------------------|-----|---|--|
| Natural England  | SA6 | According to the SA, as much as 10% of future development could take place on garden and infill sites (based on figures from the last two years). Garden land is a major contributor to habitats and biodiversity in the urban environment – particularly the ability to act as a corridor for the movement of species, because of the nature of urban form (as noted in 7.2). That the summary should conclude there would be no issues of concern shows, for a mostly urban authority, a considerable lack of understanding of the possible harm to or loss of a significant proportion of their natural environment. | The SA would maintain that the overall impact of the SPD is unlikely to have a major adverse impact. However, it will be clarified that to achieve this impacts on biodiversity will need to be mitigated against or avoided through appropriate policy guidance.<br><br>Appropriate local plan and future LDF policy will also be essential in protecting the connectivity of habitats in the urban area.   |
| English Heritage | SA7 | Work is currently evolving on Park and open spaces within the town, which should be taken into account through the and SA.  | Noted – although it may not be possible to take this into account giving the SPD timeframe.  |
| English Heritage | SA8 | It is important for the SA to broadly define the historic environment – all designated historic assets should be considered together with potential impacts on the non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place, local identity and distinctiveness in urban and rural area.   | It is not necessarily the role of the SA to list all historic assets in the plan area. The SA does make reference to statutorily designated buildings and sites and the importance of the cultural heritage to the built environment of Cheltenham and local character. Other features of cultural heritage importance will need to be identified on a site-by-site basis as part of individual planning applications, as noted in the summary appraisal of the SPD (section 7 and 8). |
| English Heritage | SA9 | The SA covers most issues that are of relevance to historic environment and will provide the background evidence to support the SPD.  | Noted.   |

## **Appendix 5**

**How the SA has informed SPD preparation – statement**

**The Environmental Assessment of Plans and Programmes Regulations 2004  
(SI 1633)**

**Regulation 16 particulars**

The preparation of the Cheltenham Borough Council Supplementary Planning Document (SPD) on 'Development on Garden land and Infill sites in Cheltenham' has been informed by a Sustainability Appraisal.

During the initial drafting process, meetings were held with between the authors of both documents in order to examine the implications of the SA objectives for the SPD. Particular attention was paid to how these related to the emerging factors and questions which form the core of the SPD.

Following the consultation process, a final version of both the SA and SPD were produced. A review of the SA at this point highlighted the treatment of issues of biodiversity and health within the SPD, and amendments were made to the text of the SPD accordingly.

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