CHELTENHAM

Local development framework

CORE STRATEGY SUSTAINABILITY APPRAISAL -

SCOPING REPORT

(Revised to reflect consultation responses)

JULY 2008

Cheltenham Borough Council
www.cheltenham.gov.uk

CORE STRATEGY SUSTAINABILITY APPRAISAL SCOPING REPORT

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NON-TECHNICAL SUMMARY

Sustainability Appraisal is a process that promotes sustainable development by integrating social, environmental and economic considerations into major new plans and programmes. It's a way of making sure sustainable development is at the heart of our plans and policies.

This scoping report describes the early stages of the sustainability appraisal process that will be used to assess Cheltenham Core Strategy. The Core Strategy will be the key document in the Cheltenham Local Development Framework, which will establish the planning objectives for Cheltenham to 2026 and replace the adopted Local Plan.

This report looks at the scope of the process, the legislative context it will be conducted in and the approach that will be used to undertake the sustainability appraisal. It also incorporates the requirements of the European Union's Strategic Environmental Assessment Directive which is designed to enhance the environment when new plans are prepared. Throughout the report all references to Sustainability Appraisal include the requirements of the Directive.

The Sustainability Appraisal process consists of five stages:

Table 1: The five stages of Sustainability Appraisal	
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope of the appraisal process
Stage B	Developing and refining alternatives and assessing effects
Stage C	Preparing the Sustainability Appraisal Report
Stage D	Consulting on the draft plan and Sustainability Appraisal Report
Stage E	Monitoring the significant effects of implementing the plan

This scoping report covers Stage A, which in itself consists of five stages:

Table 2: The five stages of Stage A – Scoping	
Stage A1	An assessment of relevant plans, policies and programmes to identify **Sustainability Themes**
Stage A2	Collection of baseline information
Stage A3	Identification of **Sustainability Issues**
Stage A4	Development of SA framework consisting of **Sustainability Objectives**, **Decision Aiding Questions** and **Potential Indicators**
Stage A5	Consultation on the scope of the SA with statutory consultees

In summary, this complex process firstly involved the identification of a series of **Sustainability Themes** using Stage A1, the assessment of relevant plans, policies and programmes. This involved looking at a range of national, regional and local plans and programmes to identify what external influences there will be on the Core Strategy Sustainability Appraisal process.

Following on from this, Stage A2, the collection of **baseline data** for Cheltenham looked at environmental, economic and social data and trends using a huge number of indicators, some of

which have been tracked over a number of years. These were then analysed to identify key **Sustainability Issues** for the town (Stage A3).

Finally, the themes and issues were used to develop a set of **Sustainability Objectives,** which will form the basis of the **Sustainability Framework** (Stage A4). In order to consider the sustainability effects of the Core Strategy, and compare how different options would help to deliver the Sustainability Objectives, a series of **Decision Aiding Questions** and **Potential Indicators** were drawn up.

28 Sustainability Objectives have been identified from this initial scoping exercise. These are shown in Table 3 below.

Table 3: Sustainability Objectives for Cheltenham Core Strategy	
1.	Protect, restore, create and enhance habitats, species and sites of wildlife or geological interest
2.	Reduce carbon emissions, striving for a carbon neutral borough
3.	Improve the resilience of people, businesses and the environment to the inevitable consequences of climate change
4.	Manage and reduce flood risk and surface water run-off
5.	Reduce water use and conserve and improve water resources
6.	Reduce the need to travel
7.	Maximise the use of sustainable modes of transport
8.	Maximise appropriate reuse of previously developed land
9.	Minimise development of open land and green spaces within Cheltenham
10.	Protect and enhance the unique setting and landscape character of Cheltenham
11.	Minimise the volume of waste created and promote reuse, recycling and composting to reduce landfill
12.	Protect and enhance Cheltenham's distinctive townscape quality and its historic heritage
13.	Improve air and soil quality and reduce noise and light pollution and the amount of contaminated land
14.	Support Cheltenham's economy by helping new and existing businesses to deliver sustainability
15.	Ensure the availability of land and premises to secure the future prosperity of Cheltenham
16.	Encourage low carbon economic growth which improves prosperity while respecting environmental limits
17.	Support people and existing businesses in reducing their carbon footprint and the use of natural resources
18.	Support the development of accessible education, skills and learning to meet the needs of both employers and the working population
19.	Support the vitality and viability of Cheltenham town centre as a retail, service, leisure and learning destination
20.	Protect and enhance Cheltenham's vibrant cultural life
21.	Integrate sustainable construction principles and standards into all development schemes

22.	Reduce inequalities in wellbeing and opportunity
23.	Promote more inclusive and self-contained communities to reduce the need to travel for everyday requirements
24.	Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities
25.	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
26.	Protect and enhance open spaces, gardens and allotments for leisure and recreation, including creating opportunities for wildlife and local food production
27.	Reduce crime and the fear of crime
28.	Encourage everyone to participate in local decision making

Public involvement through consultation is a key element of the Sustainability Appraisal process. This first round of consultation on the Scoping Report involved the three statutory consultees (Natural England, English Heritage and The Environment Agency) as well as local stakeholders. The report was made available on our website www.cheltenham.gov.uk and all comments were welcomed. The deadline for commenting on the Scoping Report was 5 pm on Monday the 18th of February.

CHAPTER 1. INTRODUCTION

1.1 This Sustainability Appraisal Scoping Report has been prepared by Cheltenham Borough Council, as part of the Sustainability Appraisal of the Cheltenham's Core Strategy Development Plan Document, which is the key document that underpins the Local Development Framework for Cheltenham.

1.2 Sustainability Appraisal is a statutory requirement for all Development Plan Documents (DPDs) under the *Planning and Compulsory Purchase Act 2004.* The Act also requires Strategic Environmental Assessment for those DPDs likely to have significant environmental effects. The requirements of Strategic Environmental Assessment have been incorporated within this Sustainability Appraisal.

1.3 The original scoping report was published in January 2008 for consultation with the three statutory bodies identified under the *Strategic Environmental Assessment Regulations (2004*): English Heritage, the Environment Agency and Natural England. The report was also made available to a number of other local stakeholders and published on Cheltenham Borough Council's website. This report contains revisions made following the consultation process.

1.4 Since consultation was undertaken on this Scoping Report, the Council has agreed in principle to work on a joint core strategy with Tewkesbury Borough and Gloucester City Councils. A joint Scoping Report will be produced and consulted on in autumn 2008.

PURPOSE OF THE SCOPING REPORT

1.4 The purpose of Sustainability Appraisal is to promote sustainable development and focus planning policy on the achievement of sustainable patterns of development in line with the overarching aim of planning set out in Planning Policy Statement 1. The process of Sustainability Appraisal seeks to integrate social, environmental and economic issues into policy making and should ensure that decisions about Core Strategy objectives and policies promote the achievement of sustainable development.

1.5 This report describes the "Scoping" stage of the Sustainability Appraisal process for Cheltenham's Core Strategy Development Plan Document. Scoping is the process of deciding the level of breadth and depth of detail required for the appraisal process, including setting the legislative context, establishing the baseline situation in the Borough and detailing the methodology to be employed during the appraisal.

1.6 More information on the scoping stage and the whole appraisal process is set out in Chapters 3 to 5, including details about the methodology employed for the Sustainability Appraisal process. Chapters 2, 6, 7 and 8 contain detailed information specific to Cheltenham.

CHAPTER 2. THE LOCAL CONTEXT

2.1 Cheltenham Borough is a predominately urban local authority nestling in the foothills of the Cotswolds in the north east of the South West Region. The Borough has a population of just over 110,000, the majority of whom live within the urban area of Cheltenham.

2.2 Cheltenham is well connected to national and regional transport infrastructure. The M5 passes directly to the west of the Borough while a mainline station provides direct services to London, Bristol and Birmingham. Cheltenham and neighbouring Gloucester are, as a result, attractive areas for business locations. Consequentially, the area is generally affluent - although there are pockets of deprivation and housing can be extremely expensive.

NATURAL AND BUILT ENVIRONMENT

2.3 Cheltenham has an attractive and distinctive natural and built environment. It is encircled by designated protected land with the Cotswolds Area of Outstanding Natural Beauty to the east and south, and green belt to the west and north. The Area of Outstanding Natural Beauty designation covers some 22% of the Borough, while 17% of land is designated as green belt. The town itself nestles against the Cotswold's escarpment and serves as a gateway and service centre.

2.4 Cheltenham's built environment is highly regarded. The town centre contains many fine examples of Regency architecture and is justly famous for its public squares and gardens. The town contains 7 distinct conservation areas and has over 2,600 listed buildings.

PLANNING CONTEXT

2.5 Cheltenham is one of 21 Strategically Significant Cities and Towns identified in the draft *Regional Spatial Strategy* (RSS) for the South West and acts as a centre for tourism and retailing within Gloucestershire and the wider region. The draft Regional Spatial Strategy outlines future growth for Cheltenham in the region of 13,800 new homes and 10,000 new jobs in the period to 2026. Such expansion is not going to be possible within the administrative boundary of the Borough and is likely to require cross-boundary cooperation with Tewkesbury Borough Council and other local authorities.

2.6 Since consultation was undertaken on this Scoping Report, the Council has agreed in principle to work on a joint core strategy with Tewkesbury Borough and Gloucester City Councils.

CLIMATE CHANGE AND SUSTAINABILITY

2.6 Cheltenham Borough Council signed the *Nottingham Declaration* in 2002 to express its commitment to tackling climate change. Working with a broad stakeholder board, the Council published *Climate Change – A Strategy for Cheltenham* in 2005. The overarching aim of the strategy is to make Cheltenham a carbon neutral Borough. This aspiration has been embedded in successive community strategies and the Council's corporate strategic framework.

2.7 *Our Future, Our Choice - Cheltenham's Sustainable Community Strategy 2008-11* is based on the principles of community engagement and participation, tackling inequalities and promoting cohesion, and tackling climate change. The Sustainable Community Strategy contains a vision for Cheltenham to:

'*deliver a sustainable quality of life, where people, families, their communities and businesses thrive; and in a way which cherishes our cultural and natural heritage, reduces our impact on climate change and does not compromise the quality of life of present and future generations.'*

2.8 Having consulted widely with the community, the following priorities were identified for concerted and coordinated action over the next 20 years, through both partnership working and implementing the Local Development Framework:

- Promoting community safety;
- Promoting sustainable living;
- Promoting a strong and sustainable economy;
- Building healthy communities and supporting older people;
- Building stronger communities and supporting housing choice;
- A focus on children and young people; Investing in environmental quality;
- Investing in travel and transport;
- Investing in arts and culture.

THE CORE STRATEGY

2.9 The Core Strategy Development Plan Document will be the key document that underpins the Local Development Framework for Cheltenham. It will establish a long term vision for the development of the Borough to 2026, reflecting the vision and aims of the Sustainable Communities Strategy. It will also define a set of clear strategic objectives and the spatial arrangement of planned development to deliver the vision.

2.10 The Core Strategy will include a spatial strategy, strategic planning policies and an implementation framework with clear objectives for achieving delivery of the vision. The Core Strategy will also integrate with national and regional plans as well as local non-planning strategies to ensure that it can address all issues relating to the Borough's future and not be constrained to issues of land-use.

2.11 The Core Strategy will be a "spatial" planning document, reflecting the change in emphasis away from merely "land-use" planning brought about by the Planning and Compulsory Purchase Act of 2004. In line with government guidance, and in light of its wider remit, the Strategy will be based on an up to date and comprehensive evidence base and therefore a number of technical studies have been commissioned.

2.12 Since consultation was undertaken on this Scoping Report, the Council has agreed in principle to work on a joint core strategy with Tewkesbury Borough and Gloucester City Councils.

EVIDENCE BASE

2.12 A significant part of the evidence base for the Core Strategy and for this Sustainability Appraisal process has been and will be generated by topic specific studies that have been commissioned by Cheltenham Borough Council and its partners. These studies include:

- **Retail and Leisure Study.** Undertaken on behalf of the Borough Council by consultants DPDS. The study assess comparison and convenience retail floorspace requirements up to 2016 and includes an assessment of the leisure and entertainment facilities of Cheltenham within the context of the sub regional role of Cheltenham as a Strategically Significant City and Town. The study was completed in December 2006.

- **Employment Land Review.** Nathaniel Lichfield and Partners were appointed to take forward a review of employment land in terms of policy, existing sites and the likely requirements for new sites. The review pulled together work already undertaken by the Borough and County Councils and newly commissioned research into a coherent document that can be used to inform the Core Strategy and its Sustainability Appraisal. The review was completed in 2007.

- **Green Belt Review.** AERC were appointed to provide an independent assessment of the Cheltenham Green Belt to inform the preparation of the Core Strategy. The review was completed in March 2007.

- **Gloucestershire Landscape Character Assessment.** The Gloucestershire Landscape Character Assessment comprises a landscape character assessment of the Severn Vale, the Upper Thames Valley area and the land on the northern fringe of the Cotswolds AONB within the Vale of Moreton and Vale of Evesham and completes a detailed review of Gloucestershire's landscape character. The purpose of the Gloucestershire Landscape Character Assessment is to observe, analyse, describe and classify these variations and distinctive patterns. The assessment was completed in January 2006.

- **Comparative Site Assessment.** The Comparative Site Assessment process has been undertaken in house. It will inform the Sustainability Appraisal process as well as the Core Strategy and future documents within the Local Development Framework. The assessments are based upon a standard methodology to ensure that a consistent approach is adopted across all sites. The assessments are expected to be completed in mid 2008.

- **Residential Land Availability Survey.** The Residential Land Availability Survey is undertaken annually in-house and monitors the availability of land for residential development within Cheltenham Borough. The survey monitors the delivery of housing against the strategic requirement and will inform the Core Strategy. The 2007 survey was completed in August 2007.

- **Housing Land Availability Assessment.** The Housing Land Availability Assessment is being undertaken in house. It seeks to identify and assess all potential sources of housing supply, including Greenfield sites, within Cheltenham Borough to ensure that Cheltenham has a potential supply of appropriate land for housing over the Local Development Framework period. The Housing Land Availability Assessment is expected to be completed by winter 2007/08.

- **Housing Market Assessment.** Fordham Research Group has been commissioned to produce a Housing Market Assessment for Gloucestershire. Its purpose is to seek to derive figures for housing need and demand within local authority areas and determine what this might mean in terms of market and affordable housing provision. It also allows authorities to develop a good understanding of housing markets, particularly in terms of their characteristics and the drivers of market change. The Housing Market Assessment is expected to be completed winter 2007/08

- **Transport Modelling.** Strategic sites identified via the Comparative Site Assessment will be subject to further analysis via transport modelling. Transport modelling work is ongoing.

- **Development and Community Planning Research Project.** A joint research project funded by Cheltenham Borough Council, Tewkesbury Borough Council, Gloucester City Council, Gloucestershire Housing Association and Gloucestershire Primary Care Trust to research the broader requirements of new developments, including health, leisure, police, community, allotments, green infrastructure, economic and social facilities, reflecting the issues highlighted by the communities of Cheltenham in consultation work undertaken summer 2006. The project will also consider the requirements of adjacent areas and existing communities. This will inform Cheltenham and Tewkesbury's Local Development Framework to support new growth over the next 20 years. It will also provide useful information for the Sustainability Appraisal of future Local Development Documents. The study is expected to be completed winter 08/09.

- **Green Space Strategy.** The Green Space Strategy will provide an assessment of green spaces and outdoor recreational and sporting facilities in the Borough, in accordance with the guidelines set out in Planning Policy Guidance Note 17. It will also contain a biodiversity audit carried out by Middlemarch Environmental Ltd. which will provide guidance on the potential distribution of, protected species, UK priority habitats & species and habitats & species identified within the Borough, the function of the key areas and wildlife corridors and recommendations for prioritised sites within the Council's ownership. The strategy will also look at play space provision. The strategy should be completed in 2008.

- **Strategic Flood Risk Assessment.** A Gloucestershire wide Strategic Flood Risk Assessment is being undertaken by Halcrow. The assessment will provide much needed flooding data and mapping for the Borough and will inform the Comparative Site Assessment process and the Core Strategy. The assessment will also address some evidence gaps within the Sustainability Appraisal process. The Strategic Flood Risk Assessment is expected to be completed spring 2008.

2.13 All of these reports will inform the Core Strategy and its associated Sustainability Appraisal. Where this data is not yet available, gaps have been identified in this Scoping Report to enable future updates.

2.14 The Core Strategy will also draw on evidence gathered as a result of community consultation conducted in parallel with consultation on the Sustainable Community Strategy. This consultation – under the title Cheltenham 2020 – was undertaken during 2006 and its results are available on the Council's website.

CHAPTER 3. THE SUSTAINABILITY APPRAISAL PROCESS

3.1 In order to ensure that the core strategy promotes sustainable development and does not encourage harmful impacts on the environment, it will be subject to a Sustainability Appraisal, incorporating Strategic Environmental Assessment. To ensure that these processes are conducted as efficiently as possible, an Integrated Assessment methodology has been developed that addresses the level of depth and breadth required by the two processes. The integrated assessment methodology will also incorporate Equalities Impact Assessment, Health Impact Assessment and a screening judgement on the need for Habitats Regulation Assessment.

THE STRATEGIC ENVIRONMENTAL ASSESSMENT DIRECTIVE

3.2 The Strategic Environmental Assessment process is designed to evaluate the potential environmental consequences of proposed policies, plans or programmes and ensure that environmental issues are fully integrated into the policy making process. Strategic Environmental Assessments were introduced by the *European Union Directive 2001/42/EC* and transposed into English law by *Statutory Instrument 1633 of 2004* - the Environmental Assessment of Plans and Programmes Regulations.

SUSTAINABILITY APPRAISAL

3.3 The requirement for Sustainability Appraisal is set out in *Planning Policy Statement 1 – Delivering Sustainable Development* and *Planning Policy Statement 12 – Local Development Frameworks*. The requirement is formalised in *Statutory Instrument 2204 of 2004* - The Town and Country Planning (Local Development) (England) Regulations 2004, which states that a Sustainability Appraisal Report must accompany all Local Development Documents at adoption.

INTEGRATED ASSESSMENT

3.4 Government guidance *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks* (Office of the Deputy Prime Minister, November 2005) – recommends that the requirements of the Strategic Environmental Assessment Directive be combined with Sustainability Appraisal to allow for a single appraisal process of all Local Development Documents.

3.5 The integrated process that has been established for the Cheltenham's Core Strategy, as described in this report, is intended to fulfil the requirements of the Directive by looking in depth at the effect on the environment of implementing the Core Strategy and the requirement for Sustainability Appraisal by expanding its scope to cover social and economic issues.

3.6 It is also intended that the appraisal process for the Core Strategy includes an Equality Impact Assessment and a Health Impact Assessment as recommended by government guidance.

EQUALITY IMPACT ASSESSMENT

3.7 Equality Impact Assessments are a specific requirement of the *Race Relations (Amendment) Act 2000* and the *Equality Standard for Local Government*, which place general and specific duties on public authorities to promote race equality and prevent unlawful discrimination. The requirement to promote equality of opportunity is also promoted through the *Disability Discrimination Act 2005*.

3.8 An Equality Impact Assessment is a way of systematically and thoroughly assessing, and consulting on, the effects that a proposed policy is likely to have on people, depending on ethnicity, age, gender, sexual orientation, disability and religion.

3.9 Although we have a legal duty to conduct Equality Impact Assessment, they can also be an improvement tool that can have many benefits, including:

- ensuring policies and services have the best possible impact on our communities;
- providing evidence to show that policies and services do not have any adverse impact on different groups within the community and are not discriminating in any way;
- making sure that policies do not overlook or exclude any groups; and
- setting out the way to collect information to give us feedback on policies and monitor their impact.

3.10 We intend to use Equality Impact Assessment to ensure that the policies of the Core Strategy will not discriminate and do all they can to promote equality and good relations between different groups.

3.11 At the scoping stage, the role of Equality Impact Assessment is to test whether the objectives derived within the Sustainability Appraisal Framework will apply equally to all sections of society and do not prejudice any groups or single out any sections of society. The Scoping Report has been subject to consultation with a variety of local stakeholders and the Council's internal equalities assessor. The Core Strategy will be assessed using the Council's adopted Equality Impact Assessment Toolkit and the result of this assessment will be reported in the Sustainability Appraisal Report.

HEALTH IMPACT ASSESSMENT

3.12 Health Impact Assessment is a non-statutory process that uses a range of methods and approaches to help identify and consider the likely health impacts of a proposed policy on the population. As yet, there is no statutory requirement to conduct a Health Impact Assessment of the Core Strategy, although further guidance is awaited. However, in a similar way to Equality Impact Assessment, it is considered that an integrated Health Impact Assessment incorporated within the Sustainability Appraisal process can be used as a tool in ensuring that the Core Strategy maximises its potential in terms of improving the health and well-being of the community.

3.13 At the scoping stage, the role of Health Impact Assessment is to test whether the objectives derived within the Sustainability Appraisal Framework are not prejudicial to improving the health of the community and will assist in maximising potential health benefits arising from the implementation of the Core Strategy.

HABITATS REGULATION ASSESSMENT

3.14 In addition to Sustainability Appraisal, Strategic Environmental Assessment, Equality Impact Assessment and Health Impact Assessment, the Core Strategy is also subject to Habitats Regulations Assessment under the *European Union Habitats Directive* with respect to its potential effect on European designated Natura 2000 sites.

3.15 It is a requirement of the European Habitats Directive 92/43 that any plan or project that is likely to have a significant effect on a European designated site, such as a Special Area of Conservation, must be subject to an Appropriate Assessment.

3.16 Cheltenham Borough does not contain any European designated sites and the closest sites to the Borough are over 5 Km away. It is considered that the Core Strategy would not have a significant effect on these designated sites and that the need for Appropriate Assessment can be screened out at the scoping stage.

3.17 Since consultation was undertaken on this Scoping Report, the Council has agreed in principle to work on a joint core strategy with Tewkesbury Borough and Gloucester City Councils. A joint Scoping Report will be produced and this will include a revised screening judgement on the need for Appropriate Assessment of the Joint Core Strategy.

CHAPTER 4. METHODOLOGY

4.1 The Sustainability Appraisal process has five stages, and their relationship to the requirements of the Strategic Environmental Assessment Directive are summarised in table 4 below. This Scoping Report represents stages A1 to A4. The remaining stages of the appraisal process will be reported in the Sustainability Appraisal Report which will accompany the submission of the Core Strategy to Examination in Public.

Table 4: The Sustainability Appraisal/Strategic Environmental Assessment process

Sustainability Appraisal Stage	Strategic Environmental Assessment Directive Requirement
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 the Core Strategy objectives against the Sustainability Appraisal Framework	
B2: Developing the Core Strategy 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 Core Strategy	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 Core Strategy	
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 Core Strategy	A description of the measures envisaged concerning monitoring.
C1: Preparing the Sustainability Appraisal Report	Preparation of an Environmental Report.
D1: Public participation on the	The draft plan or programme and the Environmental Report shall

Sustainability Appraisal Report and the draft Core Strategy	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 for monitoring	Member States shall monitor the significant environmental effects of the implementation of plans 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	

4.2 The appraisal process for the Cheltenham's Core Strategy will be undertaken in accordance with government guidance and is compliant with the Strategic Environmental Assessment Directive. A Quality Assurance Checklist is included in Appendix 3. This should ensure that the SA process meets the requirements of the SEA Directive, the Planning and Compulsory Purchase Act 2004 and local planning regulations and guidance.

CHAPTER 5. STAGE A – OVERVIEW OF THE SCOPING PROCESS

5.1 In undertaking the scoping stages of the Core Strategy Sustainability Appraisal process, two key sets of information were analysed to obtain a clear picture of both the higher level plans and policies, and the more detailed local issues, that should influence the development of the appraisal framework.

5.2 Table 5 (below) sets out the five steps in the scoping process, together with the key outputs from each step. Figure 1 (Overleaf) provides a simple overview of the scoping process.

Table 5: The five stages of Stage A – Scoping

Stage	Process	Key Output
A1	An assessment of relevant plans, policies and programmes	Identification of **Sustainability Themes from national and local drivers**
A2	Collection of baseline information; environmental, economic and social data and trends	List of **Sustainability Issues from analysing local data**
A3	Identification of key sustainability issues and possible sustainability consequences	
A4	Development of Sustainability Appraisal Framework	**SA Framework** consisting of **Sustainability Objectives**, **Decision Aiding Questions** and **Potential Indicators, based on national, regional and local issues**
A5	Consultation on the scope of the SA with statutory consultees	Revisions to the Sustainability Appraisal Framework

5.3 Throughout the SA process, the analysis and conclusions have been subdivided into three strands. These reflect both the Government's sustainable development agenda, as articulated in *Securing the Future – UK Government Strategy for Sustainable Development,* and that of Cheltenham's Sustainable Community Strategy, 2008-11, *Our Future, Our Choice*.

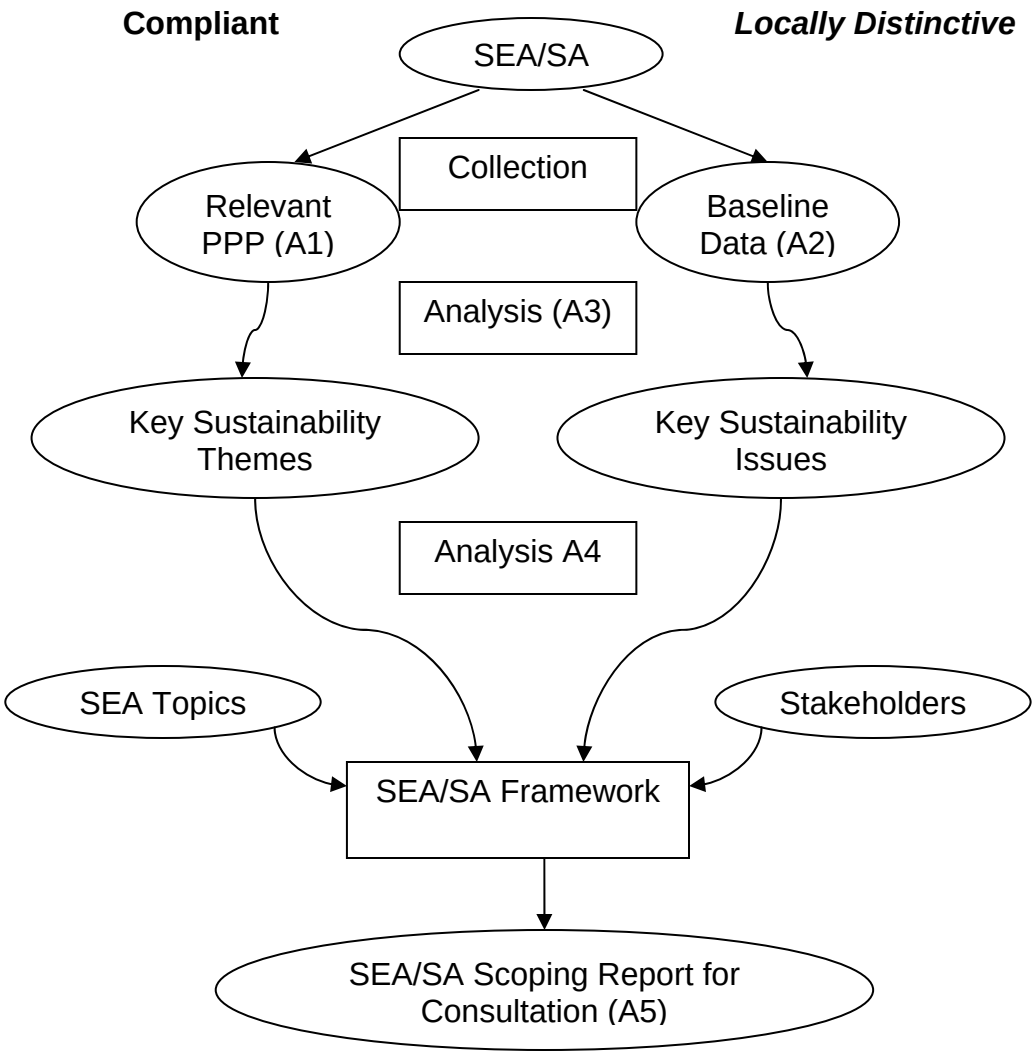
5.4 These strands are:

1. Living with environmental limits (natural resource protection and enhancement),
2. A sustainable economy (sustainable consumption and production) and
3. A strong, healthy and just society (sustainable communities).

5.5 In some instances this grouping is somewhat arbitrary, as a number of themes are concerned with more than one strand of sustainability, but the topics covered generally reflect the content of the Sustainable Community Strategy as the Local Development Framework will be a key vehicle for delivering the community's ambitions for Cheltenham.

5.6 A detailed explanation of Stages A1 to A4 is set out in chapters 6 to 8 below.

Figure 1: The Scoping Process (see table 5)



CHAPTER 6. STAGE A1 - REVIEW OF RELEVANT PLANS, POLICIES AND PROGRAMMES

6.1 The Strategic Environmental Assessment Directive and Government guidance require that relevant international, national, regional and local plans, policies and programmes are reviewed during the scoping stage of the Sustainability Appraisal process. This review should identify existing environmental protection objectives and ways in which the Core Strategy can potentially contribute to the achievement of the UK Sustainable Development Strategy and other plans and strategies at a regional and local level, including those of other local public services, such as the police or heath services.

KEY SUSTAINABILITY THEMES

6.2 Table 6 (below) sets out 16 **Key** S**ustainability Themes** that have been derived from the review of plans, policies, programmes and strategies as part of Stage A1 of the Sustainability Appraisal scoping process. The table identifies the key sources of guidance for each of the themes as at November 1st 2007. The full set of relevant plans, policies and programmes is provided in Appendix 1 of this report.

6.3 There are also a number of national strategies and local strategies promoting cross-cutting sustainable development objectives which impact on the majority of the themes, such as the *UK Government Strategy for Sustainable Development, The Planning White Paper: Planning For A Sustainable Future, 2007; PPS1: Delivering Sustainable Development, 2005, the Sustainable Development Framework for the South West; and Our Future, Our Choice – Cheltenham Sustainable Community Strategy, 2008-11*.

6.4 Documents published since 1st November 2007 will be included in the full Sustainability Appraisal report which will be published with the Core Strategy.

Table 6: Key Sustainability Themes

Sustainability Theme	Source/Evidence
1. Living within environmental limits (natural resource protection and enhancement)	
Biodiversity – work with the grain of nature to protect, restore and enhance habitats, species and sites of geological interest	European Birds Directive, 1979 Convention of Biodiversity, 1992 European Habitats Directive, 1992 England Biodiversity Strategy, 2002 – 2006 PPS9: Biodiversity and Geological Conservation, 2005 SW Biodiversity Implementation Plan, 2004 South West Nature Map, 2007 Draft Regional Spatial Strategy, 2006 Gloucestershire Biodiversity Action Plan, 2000
Climate change – reduce carbon emissions through improving energy efficiency and promoting renewable sources of energy, and reduce vulnerability to the impacts of climate change	Kyoto Protocol, 1997 The Physical Science Basis, IPCC 2007 The Nottingham Declaration Climate Change Adaptation Workstream, 2006 Code For Sustainable Homes, 2006 Climate Change: The UK Programme, 2006 Draft Climate Change Bill, 2007 SEA and Climate Change: Guidance For Practitioners, 2007

Sustainability Theme	Source/Evidence
	Stern Review on the Economics of Climate Change, 2007 The Energy White Paper, 2007 PPS1 Planning and Climate change PPS22: Renewable Energy, 2004 Renewable Energy Strategy for SW, 2003 'Warming to the idea' SW Climate Change Impacts Scoping Study, 2003 Draft Regional Spatial Strategy, 2006 Glos Renewable Energy Action Plan, 2005 Glos Sustainable Energy Strategy, 2007 Cheltenham Climate Change Strategy, 2005
Water – conserve water resources and reduce pollution, flood risk and surface water run-off	2000/60 EU Water Framework Directive, 2000 Draft Strategy For Water Efficiency in New Buildings, 2006 Code For Sustainable Homes, 2006 PPS25: Development and Flood Risk, 2006 Draft Regional Spatial Strategy, 2006 Severn Trent Water Resources Plan, 2005 Draft Severn Vale Catchment Abstraction Management Strategy, 2007 Groundwater Protection: Policy and Practice, 2006 UK Water Strategy SPG on SUDS
Transport – 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	National Cycling Strategy, 1996 Ten Year Transport Plan, 2000 Future of Air Transport White Paper, 2003 The White Paper: The Future of Transport, 2004 PPG13: Transport, 2001 The Eddington Transport Study, 2006 Developing the Regional Transport Strategy, 2004 Draft Regional Spatial Strategy, 2006 Glos Local Transport Plan, 2000 and LTP2, 2006
Land resources – protect good quality land and soil, enhance sensitive and valued landscapes and encourage recycling of previously developed land and buildings	PPG2: Green Belts, 2001 Securing the Future: UK Government Strategy for Sustainable Development, 2005 Cotswold AONB Management Plan, 2004 Draft Regional Spatial Strategy, 2006
Waste – reduce the amount of waste produced and encourage recycling and reuse to decrease the volume needing to be landfilled	Waste Strategy For England, 2007 PPS10: Planning For Sustainable Waste and Management, 2005 Draft Regional Spatial Strategy, 2006 Gloucestershire Waste Local Plan, 2004 Draft Joint Municipal Waste Management Strategy, 2007 Glos Draft Waste Core Strategy Glos SPD Waste Minimisation in Development Projects
Built environment – encourage a safe, clean and attractive environment and protect, enhance and improve understanding of the	'Towards an Urban Renaissance' 1999 The Sustainable Communities Plan, 2003 PPG15: Planning and The Historic Environment, 1994

Sustainability Theme	Source/Evidence
historic and cultural heritage	PPG16: Archaeology and Planning, 1990 Joining up: Culture South West Report, 2004 Strategy for the Historic Environment in the South West, 2004 Draft Regional Spatial Strategy, 2006
Pollution – reduce risks to health and the environment by reducing air and noise pollution and contaminated land	EC Air Quality Framework Directive, 1996 European Air Quality Directive, 2000 The Air Quality Strategy, 2007 The Urban Environment, 2007 Code For Sustainable Homes, 2006 PPG14: Planning Development on Unstable Land, 1990 PPS23: Planning and Pollution Control, 2004 PPG24: Planning and Noise, 1994 Draft Regional Spatial Strategy, 2006 Air Quality Strategy for Gloucestershire, 2004
2. A sustainable economy (sustainable consumption and production)	
Economic development – encourage sustainable economic and tourism growth which ensures high quality employment opportunities, a skilled workforce and prosperity without harming environmental quality	PPG4: Industrial, Commercial Development and Small Firms, 1992 PPG21: Tourism, 1992 (DCLG) A Guide to Sustainable Tourism in the South West, 2000 State of the Key Sectors Reports, 2004 Regional Economic Strategy For SW 2006 Draft Regional Spatial Strategy, 2006 Draft Glos Urban Economic Strategy, 2007 Economic Development Strategy for Cheltenham, 2007
Sustainable construction – promote more sustainable methods of construction to reduce resource and energy use and waste	Code For Sustainable Homes, 2006 (DCLG) Draft Strategy for Sustainable Construction, 2007 Draft Strategy For Water Efficiency in New Buildings, 2006 Building a Greener Future 2007 Future Foundations Sustainable Construction Charter for the SW, 2002 Draft Regional Spatial Strategy, 2006 Cheltenham Sustainable Construction Action Plan, 2006
Town centre – promote the vitality and viability of the town centre	PPS6: Planning For Town Centres, 2005
3. A strong, healthy and just society (sustainable communities)	
Social cohesion – reduce inequalities in health, education and learning, employment opportunities, crime and environmental quality and promote a more inclusive society, locally and globally	A New Commitment to Neighbourhood Renewal, 2001 The Sustainable Communities Plan, 2003 Our Shared Future, 2007 Creating Sustainable Communities In The South West, 2005 Draft Regional Spatial Strategy, 2006
Health – improve mental and physical health and wellbeing and reduce inequalities	Our Health, Our Care, Our Say White Paper, 2006 The Health Profile of England, 2006 Draft Guidance On Health In SEA, 2007 Our Children: Our Future, Glos 2005 – 2006 Draft Glos Health and Community Well-Being Strategy, 2007

Sustainability Theme	Source/Evidence
Housing – 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	The Sustainable Communities Plan, 2003 Code For Sustainable Homes, 2006 (DCLG) Housing Green Paper, 2007 (DCLG) PPS3: Housing, 2007 (DCLG) Creating Sustainable Communities In The South West, 2005 South West Regional Housing Strategy, 2005 Draft Regional Spatial Strategy, 2006 Cheltenham Homelessness Strategy, 2003 Cheltenham Housing Strategy, 2005
Green space – retain, create and enhance open spaces for recreation and sport to improve wellbeing	Bringing Communities Together Through Sport and Culture', 2004 PPG17: Planning For Open Space, Sport and Recreation, 2002 Draft Regional Spatial Strategy, 2006
Community safety and empowerment – reduce crime levels and improve understanding and ownership of the local area and participation in decision making	Aarhus Convention, 1998 Strong and Prosperous Communities White Paper, 2006 Cheltenham Crime Reduction Strategy, 2005

CHAPTER 7. STAGES A2 AND A3 - BASELINE DATA COLLECTION AND KEY SUSTAINABILITY ISSUES

BASELINE DATA COLLECTION (STAGE A2)

7.1 Baseline information provides the basis for predicting and monitoring effects and helps identify potential sustainability issues and alternative ways of dealing with them. The baseline data used in this scoping report draws on information for Cheltenham that has been collected over a number of years, including Best Value Performance Indicators, local quality of life indicators, and measures included in the Council's internal performance management system, TEN. Any future targets and predicted trends have also been included, where available.

7.2 Wherever possible, the most recent information that provides, ideally, both a local trend and a comparison with other areas has been used, in order to attempt to define and distil the local distinctiveness of the Borough, although inevitably some information has been difficult to obtain or track over time, and some gaps have been identified. The data used is as up-to-date as possible, as at 1st November 2007.

7.3 The new National Indicator set is likely to impact significantly on a number of these indicators and it may be difficult to continue using trend data in some instances as the criteria has altered. The full Sustainability Appraisal Report will include relevant National Indicators as well as updated data for those baseline indicators that are still appropriate.

KEY SUSTAINABILITY ISSUES (STAGE A3)

7.4 The baseline data is again subdivided into environmental, social and economic categories. A summary of the datasets for each of these areas is included below, together with an assessment of the **Key Sustainability Issues** arising from the analysis. These issues have been derived from the analysis of quantifiable and, in some instances, qualitative indicators of local circumstances and highlight any specific characteristics of Cheltenham which should be addressed though the Sustainability Appraisal process because of the sustainability consequences or tensions that could result. These consequences, together with the key trends and evidence basis are detailed with each of the Key Sustainability Issues. Some gaps have been identified where data is scarce. Some of these gaps will be filled by ongoing evidence gathering such as the development of a county-wide Strategic Flood Risk Assessment.

7.5 The full datasets are provided in Appendix 2.

Table 7A: Environmental baseline data summary

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
% of land designated as conservation area	CP – CBC LPI	2006/7	14.77%	Gap	Gap	This figure rose in the period 01/02 reflecting the designation of an additional conservation area. Since then, it has remained the same.	% of land designated as conservation area has remained static since 01/02. Most areas have character appraisals but only 16.5% have management proposals. Without management proposals it is difficult to manage and develop areas in a sustainable way
No. of conservation areas	TEN Corporate BVPI 219A	2006/7	7			See above.	
Percentage of conservation areas with up-to-date: • Character appraisal • Management proposals	TEN Corporate BVPI 219B and C	2006/7	88% 16.5%			Conservation areas with character appraisals and management proposals increasing.	
No. of listed buildings	CBC Heritage and Conservation	2006/7	2,602			The number of listed buildings fell from 2,700 to 2,540 in 2000. This was largely due to a re-list commissioned in this year by the Department of Culture, Media and Sport. Some additional buildings have been added in the last two years.	Listed buildings have management issues, particularly in terms of ensuring they are resilient to climate change and remain habitable environments
Quantity of designated LNR (and area of land)	Green Environment/ Natural England	2006/7	1 (0.8ha)			Only one designated LNR at Griffiths Avenue (0.8ha).	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 this would still be significantly below national average
Proposed LNRs (and area of land)	Green Environment/ Natural England	2006/7	6 (44.29ha)			Leckhampton Hill. Little Herberts and Pilley Bridge have been proposed as far back as 1997. (Leckhampton Hill 33.91ha, Little Herberts 0.47ha, Pilley Bridge 2.34ha) The Honeybourne Line, Wasley Brake and Weavers Field were added to the list of proposed sites in 2004. (Wasley Brake 0.14ha, The Honeybourne Line 4.14ha, Weavers Field 3.29ha)	
Area of designated local nature reserves/ per 1000 population	ACDP QOL30b	2006/7	0.007 ha	1.41 ha		Well below national average in terms of the ratio of LNRs to the population of Cheltenham	

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
Area of SSSI land designated in a condition that is: • Favourable • Unfavourable and Declining • Unfavourable and Static • Unfavourable but Recovering	Natural England	2006/7	12.9% (4.67ha) 0% 48.93% 26.96%	44.83% 8.34% 15.65% 31.18%	51.01% 5.98% 14.94% 28.07%	Only 4.67ha of total SSSI area of 36 ha is considered to be in a favourable condition. This leaves 31.33ha of land in an unfavourable condition. The condition of SSSI is the subject of a Public Service Agreement. 95% of all SSSI should be in Favourable or Recovering state by 2010. At present Cheltenham is only achieving 40%, way below the national average and government target	Cheltenham is also underachieving by 19% in terms of ensuring that SSSIs are in a favourable or recovering state by 2010. The condition and lack of designated sites could have a major impact on the biodiversity and sustainability of wildlife habitats.
Habitats: Important habitats • No. of protected BAP species • No. of protected habitats	CBC Biodiversity Audit 2006:	2006	Gap	(2007) 1,149 65	31 (in Glos) 14 (in Glos)	There are 31 protected species in Gloucestershire and 14 protected habitats, but need to drill down to Cheltenham BAP	Protected species and habitats need to be safeguarded and enhanced
Number of key wildlife sites (and area)	Glos Wildlife Trust	2006	6 (41.89 ha)		700 (in Glos)	Six of Gloucestershire's key wildlife sites are in Cheltenham: GWT reserve at the Kingham Line; Ravensgate Hill (Wistley Hill); 5.5 ha ancient woodland at Timbercombe; 3.6 ha of species rich ridge and furrow meadow at Ashgrove Farm; 5 ha of ancient woodland at Glenfall Wood and unimproved grassland at Fiddlers Green Lane	Key wildlife sites make an important contribution to the biodiversity of the borough and need to be safeguarded and enhanced
Area of Cotswolds AONB in the Borough	Strategic Land Use Team	2007	10.5 square miles (22% land in borough)			Almost a quarter of the borough is covered by AONB status, forming part of the Cotswolds AONB, which is the largest AONB in the UK	Land designated as AONB or Green Belt plays an important role in protecting the unique setting and landscape character of Cheltenham
Area of Green Belt in the borough	Strategic Land Use Team	2007	7.9 sq km (17% of borough)			Almost a fifth of the borough is covered by the green belt separating Cheltenham, Gloucester and Bishops Cleeve	
% of km of river achieving cat A (good biological quality)	ACDP QOL28a	2004/5	4.1%	86.7%		Percentage reaching good standard is very low and appears to have decreased slightly since 2003.	Biological quality of river is very poor and chemical quality dropped significantly in 2005. Much of the river Chelt is culverted which probably contributes to its poor quality.

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
% of km of river achieving cat B (good chemical quality)	ACDP QOL28b		73%	54.2%	53.9%	Percentage reaching good standard appears to be increasing slightly, but dropped in 2005. Slightly above national average	Watercourses are important for biodiversity and for acting as wildlife corridors
Ground water quality	Environment Agency		GAP				
Flooding: Area of Land in Floodplain Percentage of Borough in Floodplain	CBC GIS	2006/7	267.96 ha 5.7%	Gap	Gap	Stable – may be reviewed by Strategic Flood Risk Assessment.	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.
Number of properties at risk from flooding	CBC GIS	2006/7	4,293	2,000,000	100,000	Avoid locating inappropriate development within the floodplain through use of the sequential test, exception test and sequential approach advocated in PPS 25.	
Area liable to flood	Environment Agency		Gap	Gap	Gap	See figure 2 at end of document for flood risk map	
Surface water run off	Environment Agency		Gap	Gap	Gap	No information.	
Groundwater flooding	Environment Agency		Gap	Gap	Gap	No information.	
Developments Incorporating Sustainable Drainage Systems			Gap No local data available, Development Control officers asked to collect data	Gap	Gap	Sustainable drainage is a concept that includes long term environmental and social factors in decisions about drainage. It takes account of the quantity and quality of runoff, and the amenity value of surface water in the urban environment. Many existing urban drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable.	
Developments incorporating rainwater harvesting	GAP Development Control?		GAP				
Daily domestic water use (per capita consumption)	ACDP QOL27	2004/5	138 litres	154.14 litres		New indicator – Data only for 2003/04. Residents in Cheltenham consume 10% less water than the UK average	Water consumption and demand for water will become increasingly important as the climate changes. Warmer wetter winters and hotter drier

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
							summers mean that a greater proportion of rain will fall within a shorter time period and probably in more intense bursts. Storage of water will be an issue, especially as demand is likely to be higher during hot, dry spells
No. allotment plots	TEN GE2B	2006/7	628	Gap	Gap	The number of allotment plots has steadily decreased over the accounted period, reflecting a drop in usage and the development of some allotment plots.	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.
% tenanted allotments	TEN GE2	2006/7	88%			Allotments available are being increasingly well utilised, reflecting growing demand.	
Net increase/decrease in trees	TEN GE5 (2001/02-2003/04) Chris Chavasse (CBC)	2006/7	36			The net figures have decreased dramatically since 2000/01 when net increase was 242.	Tree numbers overall and the number of new/replacement trees on council-owned land have been decreasing steadily. 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.
New/replacement trees on CBC land	Chris Chavasse (CBC)	2006/7	109			The number of new/replacement trees have been decreasing.	
Domestic waste • % land filled • % recycled • % composted	TEN Corporate BVPI 82A, B, D	2006/7	70.5% (74.2) 18.1% (16.51) 11.6% (9.33) (2005/6 data in brackets)	2005/6 62.26% 17.61% 9.01%		% of land filled has been progressively decreasing but is still well above national average. Recycling and composting have increased dramatically with composting slightly above national average and recycling slightly under England target of 24% recycled/ composted by 2005/6	Waste and recycling rates are improving, but Cheltenham does not perform well, falling largely within the 3rd national quartile for performance, where 1st quartile is best. Landfilled waste contributes to climate change through the release of methane, which is 21 times more harmful than CO_2. It is also costly to landfill because of the Landfill

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
Kg of waste collected per head p.a	TEN Corporate BVPI 84A	2006/7	455 kg (446.2kg 2005/6)	438.63 kg (2005/6)		Kg of waste collected per head increased until 2000, but has dropped since then in line with increasing emphasis on waste reduction. Still above national average	Tax. In order to conserve natural resources and reduce our impact on climate change we need to reduce the amount of waste we create, reuse more of the waste we currently throw away and increase our recycling rates
% new homes built on previously developed land	TEN Corporate BVPI 106	2006/7	90.4%	Gap	63% (2005)	After reaching its peak in the period 2001-03, the use of previously developed land has dropped off. However, there has been an increase in 2006/07. Rate of use of previously developed land is much higher in Cheltenham than for the SW, reflecting the urban nature of the borough	Almost all development is occurring on previously developed sites. The reducing availability of sites is leading to pressures to develop garden areas and pressures for high densities, which impacts on residential amenity, opportunities for food growing, wildlife and capacity to surface absorb runoff
% of gardens built on	Rob Lindsey		Gap	Gap	Gap	Garden evidence??	
Green space data	John Crowther		Gap	Gap	Gap	Data on access to open space? Amount of space available?	
Light pollution	Campaign to Protect Rural England (see map at rear of document)	2000	Saturated			Light pollution has increased from 1993 to 2000 and Cheltenham is now classified as saturated	Cheltenham suffers from saturated light pollution, which can be an issue for local residents and interest groups as well as adding to energy use and carbon emissions
Air Pollution: Air Quality Management Areas	UK National Air Quality Archive	2006/7	0	Gap	32 (2007)	There is no Air Quality Management Area designated in Cheltenham indicating that pollution levels are not severe.	Air quality is not such a significant local issue to warrant designating an AQM area
No. of sites of potential concern with respect to contamination	TEN Corporate BVPI 216A	2006/7	608	Gap	Gap	Too little information to give an accurate picture yet.	
Cheltenham's Ecological footprint – global hectares per	www.Ecologicalbudget.org.uk WWF/ Stockholm	2005/6	5.39 gha	5.4 gha	5.24 gha	Our target footprint should be 1.8 gha if we are to live within our ecological budget – in the UK we use 5.4 gha and are 15th highest the world. Cheltenham is above the regional	Our ecological footprint shows that we consume more than our fair share of the planet's resources, needing three

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
person	Environment Institute					average.	planets' worth of resources to sustain our current lifestyles. We need to move towards a more sustainable way of living, reducing and recycling waste, conserving energy and natural resources, reducing our dependency on carbon-based energy sources, reducing our need to travel and supporting our local economy
Estimated CO_2 emissions for industrial and commercial sector	DEFRA CO_2 emissions estimates experimental data (kilotons)	2005	308		358	Lower figure for Cheltenham probably related to type of industry within border. Year on year figures are not directly comparable but emissions from the industrial and commercial sectors in Cheltenham have been increasing steadily	There is now global scientific consensus that CO2 emissions from human activity are contributing to climate change and we need to stabilise emissions by 2015. CO2 emissions for Cheltenham are lower than regional and national averages, but industrial and commercial emissions are rising and overall our emissions are too high The UK has a national target to reduce CO2 emissions by 60% by 2050. The regional initiative 'Fair shares, fair choice' has set a target for 2007 to reduce CO2 emissions to 4.2 tonnes per person.
Estimated CO_2 emissions for road transport	DEFRA CO_2 emissions estimates (kilotons)	2005/6	88		250	Low figure probably due to size of borough.	
Carbon Dioxide emissions in tonnes – Total CO2 emissions for Cheltenham	DEFRA, CO2 emission estimates	2004/5	642,000			DEFRA Data weighted to reflect local circumstances - Cheltenham is nearly 36% below regional average. Year on year data is not directly comparable, but emissions appear to be increasing.	
Total CO2 emissions for Cheltenham per capita	ACDP data for 2003/04 (tonnes)	2003/4	5.8	9.6	8.2	ADCP shows level is 40% below national average. Lower figure for Cheltenham probably result of type of industry and size of borough. Fair shares target for SW for 2007 is 4.2 tonnes per person.	
Estimated domestic carbon dioxide emissions	ACDP QOL25 (kilotons)	2004/5	269000	N/A	299,000	Cheltenham 4% below regional average	

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
Estimated domestic carbon dioxide emissions per capita	ACDP QOL25 (tonnes per capita)	2004/5	2.4	2.6	2.6	Cheltenham 7.5% below regional average of 2.6 t. National average also 2.6t.	
Average annual domestic consumption of electricity per consumer (kWh)	BERR (experimental data) – ACDP QOL26 (kwh)	2005	4783			Electricity use has increased over the 3 years recorded, 2nd lowest in the county.	Electricity use is increasing in spite of energy efficiency measures
Average annual domestic sales of gas per consumer (kWh)	ACDP QOL26 (kwh)	2004	18,552	N/A	N/A	Gas consumption per consumer has been decreased steadily between 2001 and 2003, but increased in 2004. 2nd lowest in the county.	
Average annual industrial/commercial gas sales per consumer	DTI energy trends (kWh)	2005	358,809	645,050	584,372	Gas consumption has been falling since 2003 and is significantly below regional and national averages	
Average annual industrial/commercial electricity sales per consumer	DTI energy trends (kWh)	2005	84,222	78,223	62,847	Electricity consumption has been increasing steadily and, for the first time in 2005, was above both regional and national averages	Electricity consumption contributes to climate change. The business community needs to adopt a low carbon approach to its activities to significantly reduce its consumption of electricity and its reliance on imported energy
MW of installed renewable electricity in Glos.	SWEA – Glos. Renewable Energy Action Plan, RegenSW survey April 2007	2007	9.89 across Glos, 0 in Cheltenham		RSS target 40-50mw of installed capacity by 2010	A steady increase across the county, but none in Cheltenham.	Renewable energy generation in Gloucestershire has been increasing steadily, but there is very little in Cheltenham. Lack of local renewable energy generation means a greater dependence on imported energy from non-sustainable sources leaving Cheltenham vulnerable to increasing energy prices and issues of energy security
MW of installed renewable heat capacity	SWEA – Glos. Renewable Energy Action Plan, RegenSW survey April 2007	2007	1.26 mw in Cheltenham , 1.49 mw in Glos		RSS target 100mw of installed heat capacity by 2010	Includes 1.26mw in Cheltenham at Chelsea Building Society, although this was not included in RegenSW April 2007 survey	

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
Developments meeting Code for Sustainable Homes (and previously EcoHomes) or BREEAM Standards			Gap	Gap	Gap	Specific Housing Corporation funded projects at Sochi Court and India & Pakistan House built to EcoHomes 'good' and 'very good', and Chelsea Building Society built to 'excellent' BREEAM standard, but information not routinely collected?	New developments should be built in ways that minimise their impact on the environment and ensure they are resilient to the effects of climate change. The adoption of the Code for Sustainable Homes and BREEAM standards could contribute to achieving this. Refurbishment projects should also take account of these issues

Table 7B: Key environmental sustainability issues

Key sustainability issues	Evidence and trends	Sustainability Consequences
Conservation Areas and Listed Buildings – significant conservation area coverage and high numbers of listed buildings	% 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.	Without management proposals it is difficult to manage and develop areas in a sustainable way. Listed buildings have management issues, particularly in terms of ensuring they are resilient to climate change and remain habitable environments
Habitats – small number of designated sites and very low area of SSSI's in favourable condition, decreasing numbers of trees on council owned land	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. Only 20% of SSSI land is favourable or recovering, well below the 95% target for 2010. Tree numbers overall and the number of new/replacement trees on council-owned land have been decreasing steadily	The condition and lack of designated sites could have a major impact on the biodiversity and sustainability of wildlife habitats. 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.
Land designated as AONB or Green Belt – plays an important role in protecting the unique setting and landscape character of Cheltenham	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	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.
River quality – very poor biological and reducing chemical river qualities	Biological quality of river is very poor and chemical quality dropped significantly in 2005.	Much of the river Chelt is culverted which probably contributes to its poor biological and chemical quality, but watercourses are important for biodiversity and for acting as wildlife corridors.
Flooding – significant risks from flooding, especially with changing climate	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 groundwater flooding but recent experience shows that existing drainage systems and flood attenuation schemes will not be able to cope.	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
Water consumption – residents making good progress by consuming less water than UK average but climate change could impact on resources	For the only year with data, residents in cheltenham consumed 10% less water than the national average which is extremely positive.	Water consumption and demand for water will become an increasingly important issue as the climate changes. Warmer wetter winters and hotter drier summers mean that a greater proportion of rain will fall within a shorter time period and probably in more intense bursts. Storage of water will be an issue, especially as demand is likely to be higher during long periods of hot weather, which may result in water shortages

Key sustainability issues	Evidence and trends	Sustainability Consequences
Allotments – 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.
Waste and recycling – although recycling and composting rates are improving, they still lag behind national averages	Waste and recycling rates are improving, but Cheltenham still does not perform well, with above average volumes of waste collected per head and % landfilled	Landfilled waste contributes to climate change through the release of methane, which is 21 times more harmful than CO_2. It is also costly to landfill because of the Landfill Tax. In order to conserve natural resources and reduce our impact on climate change we need to reduce the amount of waste we create, reuse more of the waste we currently throw away and increase our recycling rates
Unsustainable lifestyles – Cheltenham has a high ecological footprint	Our ecological footprint shows that we consume more than our fair share of the planet's resources, needing three planets' worth of resources to sustain our current lifestyles.	We need to move towards a more sustainable way of living, reducing and recycling waste, conserving energy and natural resources, reducing our dependency on carbon-based energy sources, reducing our need to travel and supporting our local economy
CO2 emissions – electricity use and CO2 emissions are rising, rather than falling in line with national targets. CO2 emissions and electricity consumption within the business sector are increasing steadily	CO2 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. Domestic electricity use is also increasing in spite of energy efficiency measures, while gas use is fluctuating. Industrial electricity use is rising steadily, and is well above average, gas use is decreasing and is below average. CO2 emissions from industry are increasing	There is now global scientific consensus that CO2 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 CO2 emissions by 60% by 2050. The regional initiative 'Fair shares, fair choice' has set a target for 2007 to reduce CO2 emissions to 4.2 tonnes per person. The business community needs to adopt a low carbon approach to its activities to significantly reduce its consumption of electricity and its reliance on imported energy
Renewable energy generation – a general lack of renewable facilities and installations in Cheltenham	Renewable energy generation in Gloucestershire has been increasing steadily, but there is very little in Cheltenham.	Lack of local renewable energy generation means a greater dependence on imported energy from non-sustainable sources leaving Cheltenham vulnerable to increasing energy prices and issues of energy security
Sustainable construction – only a few schemes have been built to good eco building standards and the government agenda is moving swiftly	A couple of social housing schemes and one office building have been built to Ecohomes or BREEAM standards (data needed)	New developments should be built in ways that minimise their impact on the environment and ensure they are resilient to the effects of climate change. The adoption of the Code for Sustainable Homes and BREEAM standards could contribute to achieving this. Refurbishment projects also need to take account of these issues
Pollution – although air quality is not a significant issue, light pollution levels are saturated.	No air quality management areas designated although whole borough is classified as being saturated in terms of light pollution. Data on contaminated land and noise inconclusive	Air quality is not such a significant local issue to warrant designating an AQM area. Light pollution saturation can be an issue for local residents and interest groups; street lighting adds to energy use.
Brownfield land – high take-up	The number of homes built on previously high has been	Almost all development has been occurring on Brownfield sites, the

Key sustainability issues	Evidence and trends	Sustainability Consequences
means fewer sites available bringing pressures on garden areas, which impacts on quality of life, opportunities for food growing, wildlife and flooding	high over recent years – data on garden land needed.	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

Table 8A: Economic baseline data summary

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
Retail Rank – of all centres in UK	MVE	2006	23rd	N/A	N/A	Rising. Cheltenham has consistently been ranked higher in the national retail hierarchy than its population would suggest.	Cheltenham's role as a destination for retail should be encouraged but could lead to unsustainable traffic patterns if public transport is not improved in step.
Business Stock	NOMIS	2006	4040	1,892,385	183,420	Increasing numbers of businesses	A flexible labour market is required to allow businesses to grow and develop. Growth in the business stock is a sign of good economic performance in Cheltenham and an entrepreneurial spirit.
VAT registration	NOMIS	2006	415	177,765	15,745	Stable – with annual fluctuations over last decade between 380 and 435	New registrations remain high and suggest that Cheltenham has an economy that is attractive for new businesses
VAT de-registration	NOMIS	2006	296	139,205	12,095	Falling – significant decrease in 2005 and 2006 from around 400 in early 2000's	Fewer deregistrations suggest that the existing business base is strong
New Firms % of stock	NOMIS	2006	10.3%	8.6%	9.4%	Stable. A high percentage of new firms hints at a high level of confidence in Cheltenham as a place to do business.	New business start-ups are notoriously vulnerable and need to be supported.
Availability of employment land in Cheltenham	CBC 2007 Employment Land Audit	2007	-14.59 ha net change since 1991			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
Percentage of population of working age	NOMIS	2006	62.4%	62.2%	60.2%	No trend data available. Cheltenham has an above average ratio of people of working age to population.	With a national trend towards an ageing population, this ratio will need to be monitored in the future as there will be fewer people of working age available to fill jobs. Conversely, people are living longer and keeping their health. Pension predications also indicate that people will need to work for longer This means that a greater age range of people will be seeking work and it will therefore be important to provide flexible jobs that meet the needs of the population at different stages in their lives

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
Job Density (Ratio of jobs per person of working age)	NOMIS	2005	0.93	0.83	0.86	Stable. Cheltenham has a very high ratio of jobs per person of working age. While a positive trend that shows the vitality of Cheltenham's economy this can also lead to inflexibility within the labour market.	It is vital that employment growth is balanced with housing growth to ensure that Cheltenham does not become reliant on in-commuting.
Containment rate	Census 2001		70%			High numbers of people living and working in Cheltenham	Evidence that high numbers of the workforce live in Cheltenham indicates that in-commuting levels are not currently a significant issue??
Percentage of working age population that is economically active	NOMIS	2006	79.9%	78.6%	81.0%	Long term gradual decline. Above national average but below regional average.	There is a need to encourage economically active people to live and work in Cheltenham.
Percentage of working age population claiming job seekers allowance	NOMIS	2006	1.9%	2.15	1.2%	Falling gradually	The percentage of people of working age claiming JSA is falling. This trend needs to continue.
The percentage of unemployed people as at August each year	Chelt Story or Karen McDonald (GCC)	2006/7	2%	2.5% (DWP 2007)	Gap	Steady decrease from 1998 – stable over the last 3 years and below national average. Slight increase in 2006/07.	Although the percentage of working age people who are in work has remained relatively stable, the percentage of unemployed people who have been out of work for more than a year has increased steadily and is above national and regional averages.
% of unemployed people claiming benefits who have been out of work for more than a year.	ACDP QOL12b (Job Seeker claimants)	2005/6	18.9%	11.06%	Gap	Steady increase and consistently above national average	
Education: 16-74 No Qualifications	ONS 2001 Census	2001	21.56%	28.85%	26.18%	Educational achievement is reasonably high in Cheltenham, figures are better than both regionally and nationally.	Over 1/5 of the population aged between 16 and 74 have no qualifications. In the future, a greater number of jobs are likely to require skilled workers and being able to access learning opportunities throughout life will become increasingly important.
The percentage of 15 year-olds getting five or more GCSEs at grades A* to C in Glos	ACDP QOL21	2006/7	65.7	59%		There has been a steady increase since the data was first recorded and Glos is in the top quartile and above the UK average of 56%.	Educational attainment well above UK average

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
16-74 Degree or Equivalent	ONS 2001 Census	2001	26.54%	19.90%	18.84%	Educational achievement is reasonably high in Cheltenham, figures are better than both regionally and nationally.	High educational achievement levels reflecting skilled workforce
Skills: working age with no skills	NOMIS	2006	9.8%	13.8%	9.8%	Long-term decline, with Cheltenham well above national average	The skills base has been improving steadily but this needs to be maintained
Skills: NVQ 4 or higher	NOMIS	2006	36%	27.4%	27.3%	Long-term rise, with Cheltenham well above regional and national averages	The Cheltenham workforce is generally well skilled, with a significantly higher than average percentage of highly skilled workers.
Percentage of workforce in professional/ managerial work	NOMIS	2006	53.5%	42.3%	41.9%	Stable – rapid rise in 04/05, well above regional and national averages	Cheltenham's high percentage of professional and managerial jobs reflects its importance as a headquarters or regional headquarters for many firms.
Gross Weekly Pay	NOMIS	2006	£487	£459	£433	Rising, well above regional and national averages	Cheltenham offers generally high wages,– this could promote in commuting if growth in household numbers does not keep pace with employment growth and Cheltenham's house price to income ratio remains high
Percentage employed in manufacturing	NOMIS	2005	13.1%	11.1%	11.4%	Falling, but Cheltenham's manufacturing base is still stronger than national and regional averages. This reflects the fact that manufacturing has declined less in Cheltenham than in other parts of the country.	Cheltenham's manufacturing base is concentrated in highly skilled work and hi-tech production, will need to maintain and ideally grow employment levels in this sector
Percentage employed in tourism related industries	NOMIS	2005	7.6%	8.1%	8.8%	Stable – slight short term rise, but below national and regional averages	Cheltenham's status as a tourist attraction does not generate the level of tourism related employment that may be expected. The town's tourism offer should be maximised to benefit the local economy and translate into more jobs for Cheltenham's residents.
Car Ownership: No Car	ONS 2001 Census	2001	23.25%	26.84%	20.21%	The number of people who do not own a car is lower than the national figure but higher than regional levels, possibly due to the fact that	For those without access to a car, access to facilities and services is a crucial issue, ensuring that alternatives to the car are available and that distances are kept to a

Key Indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability issue
						Cheltenham is a very compact district, compared with other areas around the SW	minimum are key issues
2+ Cars	ONS 2001 Census	2001	30%	29.47%	33.62%	Private car ownership is reasonable compared to regional and national figures.	30% of households in Cheltenham own two or more cars. Car use contributes to climate change through the burning of fossil fuels. We need to reduce car use and promote other forms of transport, including walking and cycling, to help combat climate change. Reducing car use will also improve our environment and provide health benefits for the population
Retail footprint ranking	CACI retail footprint	2006/7	36th		4th	Cheltenham's ranking dropped from 30th to 36th nationally and from 2nd to 4th regionally	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
Percentage contribution of festivals to total business turnover	The Economic Impact of Cheltenham 's Festivals 2002	2002	0.8%			Cheltenham's festivals make an important contribution to total business turnover in the town	

Table 8B: Key economic sustainability issues

Key sustainability issues	Evidence and trends	Sustainability Consequences
Maintaining a strong economy – 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 average. Employment in tourism activities lags behind	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
Loss of employment land – 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 diverted from the town
Workforce issues – Supporting Cheltenham's highly skilled workforce and keeping unemployment levels low through a range of job opportunities to meet changing needs of the population	Above average working age population, decline in number economically active, low levels of unskilled labour, well above average academic and professional qualifications, above average salary levels. Stable unemployment levels, although numbers of long term unemployed increasing	In the future, a greater number of jobs are likely to require skilled workers and being able to access learning opportunities throughout life will become increasingly important. Providing flexible jobs that meet the needs of the population at different stages in their lives will also be important.
Lifelong learning – educational attainment generally well above UK average	Educational attainment well above UK average	The job market in the future is likely to be more flexible and require greater and changing skills. Providing learning opportunities throughout life will be important in enabling workers to react and adapt to the changing job market
Car ownership – while the number of households with 2 or more cars is high, the number without access to a car is also significant	30% of households in Cheltenham own two or more cars, although conversely 23% are without a car at all.	Car use contributes to climate change through the burning of fossil fuels. We need to reduce car use and promote other forms of transport, including walking and cycling, to help combat climate change. Reducing car use will also improve our environment and provide health benefits for the population. However it is also essential to ensure that those without a car are able to access facilities and services
Reinforcing the Town Centre – 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

Table 9A: Social baseline data summary

Key indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability Issue
Population: Total	ONS - Mid year estimate	2006	111,500	50,762,900	5,124,100	The population of Cheltenham has been gradually increasing since 2004.	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, but the proportions are still above the national average. Fewer children means a smaller workforce in future. As the population ages, there could also be an increase in pensioners as a proportion of the population
Under 15 (%)	ONS - Mid year estimate	2006	16.23	11.58%	10.66%	The percentage of under 15 year olds in Cheltenham has been decreasing over the last 6 years, but is still higher than national and regional averages	
Over 65 (%)	ONS - Mid year estimate	2006	17.22	15.93%	18.73%	There has been a steady decrease of over 65's living in Cheltenham, but levels are still above the national average	
Household size	ONS - Mid year estimate	2006	2.19	2.21	2.22	A steady decrease in the average household size which leads to increased demands on the housing stock. Household size below national and regional averages.	Household size steadily decreasing, putting more demands on the housing stock
Number of affordable housing and social rented properties – CBC	TEN NR STAT 02 or Roger Sparks (CBC)	2006/7	6,520	n/a	n/a	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	There are fewer affordable homes in Cheltenham
Number of affordable homes enabled within borough boundary	TEN NR11	2006/7	91	n/a	n/a	An increase in the provision to 03/04 and a decrease in the years after until 2006/07 where there was an increase. Averages 75 units per annum provided	Fluctuating levels of new affordable housing provision, averaging less than the number of units lost through right to buy
Number of people who are homeless	TEN CS23	2006/7	170	n/a	n/a	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.	Number of homeless increased dramatically since 1998/9
Average house price to average income	Chelt Story	2004/5	8.8	n/a	n/a	House prices are rising dramatically coupled with a low	Rapid increase in house prices, income levels have lagged behind, causing

Key indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability Issue
ratio						rise of annual income, creating issues of affordability for first time buyers. Second highest ratio in Gloucestershire after Cotswold District Council (11.4).	affordability issues and increased levels of in-commuting from areas with lower house prices which brings with it the associated problems of traffic congestion and its impact on climate change.
Average house prices in Cheltenham	Land Registry Property Price Report	2007	£233,842	£230,474	£240,359	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 will also have consequences for the local economy as businesses may find it increasingly difficult to recruit staff.
Total number of new housing completions and % affordable	RLA Report	2006/7	1012 9%	n/a	n/a	The number of new housing completions increased rapidly in 2006/07, with 9% affordable, well below 40% target as few larger sites are coming forward.	Housing building rates increased dramatically in 2006/7, but only 9% affordable
Number of dwellings that have been empty over 6 months	TEN NR STAT 04	2006/7	450			Whilst this figure remains high, it peaked in the years 00/01 and 01/02 and has dropped dramatically in the following years, due to changes in council tax charges.	Number of empty and second homes remains high – these should be brought back into use to reduce housing demand
Number of second homes on council tax register	TEN stat 05	2006/7	671			The number of second homes is steadily increasing.	
Number of reported crimes per 1000 households: • domestic burglaries • violent offences (number of robberies per 1000 pop) • vehicle crime (1,000 pop.)	TEN PP BVPI 126, 127b, 128 National data from Home Office	2006/7	 14.9 27.3 4	 13 19 9	Gap	Domestic burglaries – increased during 2001-03 but dropped slightly since. Slightly above national average. Violent offences - have increased per 1000 households, though the criteria for recording this have altered and may be unreliable. Cheltenham is significantly above the national figure Vehicle crime - has dropped dramatically and is well below national average	Crime rates have reduced for domestic burglaries and vehicle crime, but increased for violent offences, which are significantly above the national figure

Key indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability Issue
Percentage of residents that feel fairly safe or very safe: • Outside after dark • Outside during the day	Chelt Story or Dermot Carr (GCC) for latest data	2006/7 (Data for 2005)	42.5 (37.5) 89.7 (90.7)	Gap	Glos data 2005 45.7 91.5	Numbers feeling safe at night is increasing slowly with a slight decrease in numbers feeling safe during the day last year, with overall trend improving. Slightly higher fear of crime rates than the county average.	General improvements in perceptions of safety outdoors increases quality of life for residents
% of population living in most deprived Super Output Areas (worst 25%) Glos QoL	ACDP QOL15	2003/4	9%	20%	Gap	4 wards in Cheltenham are in the worst 25% nationally – Hesters Way, Springbank, St Paul's' and Oakley – 2nd worse district in the county. Lower % living in SOA than national average.	Although Cheltenham is considered to be an affluent town, 9% of the population lives within highly deprived areas and nearly 16% of children live in low-income households. Deprived areas have wide ranging issues including poor housing and health, poor local environment and low levels of economic activity and learning achievement.
The proportion of children under 16 living in low-income households % of children and people over 60 living in income deprived households	ACDP QOL17a ACDP QOL17b	2003/4	15.8% 11%	18.3% 14%		16% of children are living in deprived households compared with the national average of 18.3%. Fewer of Cheltenham's pensioners are living in low income households than the national average	
% of working age claiming key benefits	ACDP QOL16	2005/6	10.9%	13.2%		Slight increase in number claiming benefits over last 3 years, but still lower than national average	11% population claiming benefits
Death rate by cause for every 100,000 people in the population: • cancer in under 75s • circulatory diseases in under 75s • suicide • all accidents	Chelt Story Glos QoL	2004/5	94.4 79 10 14	England and Wales 121.9 97.5 9 16	Gap	Cancer – steady decrease since 2001 and considerably below average for UK. Circulatory – consistent decrease and well below national average Suicide – decrease since 2001, but slightly above national average Accidents – fairly static, below national average and 2nd lowest in the county.	Suicide rates are slightly above average, cancer and circulatory disease levels are both well below national averages
Limiting Illness	ONS 2001 Census	2001	15.6%	18%	18%	Cheltenham's health is considerably better than regional	Low levels of limiting illnesses

Key indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability Issue
						and national averages.	
Infant mortality rate – per 1,000 live births	Chelt Story	2003/04	4.3	5.1		Dropped since 2002 and below UK average	Infant mortality well below UK average and falling
Life expectancy rates (3 yr averages) • Males • Females	ACDP QOL33 Glos QoL	2005/6	 78.6 82.3	 76.92 81.14	 78.1 82.2	Steady increase in life expectancy and above national average for both males and females.	Above average life expectancy
% of electoral voting at last election	ACDP QOL4	2005	61.15%	61.4%	Gap	The percentage of electoral voting has consistently been above 30% and was on par with national average in 2005, when there was a higher turnout as this was a combined election with Parliamentary.	Reasonably good level of turn out at elections
% of people surveyed who feel that they can influence decisions affecting their local area • as individuals • working together	NEW QOL – National source for data in the future	1999/2000	 38% 59%	Gap	Gap	No recent information - Too little information to give an accurate picture.	Higher levels of people feeling they can influence decisions indicates a population that engages with the decision-making process and an authority that consults
Local bus services: • number of park and ride tickets sold • number of bus trips (million)	Old BVPI 102 Jonathan Roberts GCC & Ben Cole Stagecoach Derek Lucas GCC	2006/7 2004/5	630,249 16.7 m			The number of park and ride tickets sold has quadrupled over the recorded period. Bus trips have been relatively stable over the last few years.	Park and Ride usage has increased dramatically, normal bus trips have been stable
Travel to work data: • % cycling • % walking • % using public transport • % reliant on the car	Old QoL 36 - Glos Local Information Network	2003/4	10.6% 14.3% 3.5% 28.4%	3% 11% 15% 24%	4% 12% 7% 23%	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	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

Key indicator	Source	Year	Cheltenham data	National data	Regional data	Trend	Sustainability Issue
						average. Overall use of alternatives to the car is high.	
Road casualties (nos. killed or seriously injured, 3 year averages) • pedestrians • cyclists • motorbike/scooter/ moped • car users • other vehicle	Denise Vizor GCC	2007	8.0 5.0 6.7 10.7 1.7	Gap	Gap	Since peaking in 2002, pedestrians and cyclists casualties have dropped. The level of car user casualties was very high in 2001 but has reduced significantly since then. More analysis needed.	Low levels of road casualties improves quality of life for residents
Average daily traffic flow on principal roads: • Tewkesbury Road • Evesham Road • London Road • Shurdington Road (1999) • Gloucester Road	Kathryn Haworth (Gloucestershire County Council)	2006/7	27300 19100 22200 14800 43800			Traffic on Shurdington Road appears to have dropped but increased elsewhere.	Traffic volumes generally increasing, which increases carbon emissions
Estimate traffic flows for all vehicle types (million vehicle km)	ACDP QOL45	2005/6	6015 mvkm	2864 mvkm		Figures increasing slowly, Cheltenham's rate is three times the national average.	

Table 9B: Key social sustainability issues

Key Sustainability Issues	Evidence and trends	Sustainability consequences
Population – 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. More employment opportunities will need to be created to accommodate the growth in the working age population, although fewer children means that there is likely to be a smaller workforce in future, with an increasing number of pensioners. A greater working age population could have positive benefits in terms of disposable income if it is spent in the local economy
Affordability – 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
Housing stock – despite high levels of house building, little new housing is affordable and number of empty and second homes remains high. GAP – fuel poverty?	Housing building rates increased dramatically in 2006/7, but only 9% affordable, number of empty homes remains high and number of second homes increasing	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
Crime rates – high crime rates for violent offences, domestic and vehicle crime reducing, as is fear of crime	Crime rates have reduced for domestic burglaries and vehicle crime, but increased for violent offences, which are significantly above the national figure; general improvement in perceptions of safety outdoors	The increase in violent offences could have a negative effect on peoples' perception of safety, which has been improving. Social cohesion may affect crime rates and it will be important to build strong communities. Opportunities for designing out crime should also be maximised
Deprivation – nearly a tenth of households live in highly deprived areas, 16% children live in households on benefits	Although Cheltenham is considered to be an affluent town, 9% of the population lives within highly deprived areas and nearly 16% of children live in low-income households.	Deprived areas have wide ranging issues including poor housing and health, poor local environment and low levels of economic activity and learning achievement.
Health – generally good, although suicide rates are high	Suicide rates are above average, although cancer and circulatory disease rates are well below average. Low levels of limiting illnesses, infant mortality well below UK average and falling, above average life expectancy	Cheltenham's residents enjoy good health, although suicide rates are above average. The growth in single person households and potential decreasing levels of social interaction may create some health issues and so opportunities for and accessibility to social activities could become increasingly important

Citizenship – good levels of democratic participation	Reasonably good level of turn out at elections, about average for the UK	High turnout indicates engagement in democratic processes and a consultative approach by local authorities
Transport – increasing traffic volumes, cycling, walking and Park and Ride use high, but public transport is below average	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	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

CHAPTER 8. STAGE A4 - THE SUSTAINABILITY APPRAISAL FRAMEWORK

8.1 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.

8.2 The framework consists of **Sustainability Objectives** which identify the goals that the whole Sustainability Appraisal process should be seeking to deliver, based on the **Key Sustainability Themes** identified in Stage A1, and the **Key Sustainability Issues** identified in Stages A2 and A3. It also includes **Decision Aiding Questions** and related **Potential Detailed Indicators** to help ensure that all the key issues considered in the appraisal process are incorporated into the framework.

8.3 Table 10 below pulls together all the Themes and Issues from stages A1 and A3, together with an indication of the aims of Cheltenham's Sustainable Community Strategy. These have all have helped to shape the **Sustainability Objectives** for the Core Strategy Sustainability Appraisal process, which are also shown in the table.

8.4 The Strategic Environmental Assessment Directive stipulates that a number of environmental topics need to be addressed in the Strategic Environmental Assessment process; Table 10 below also identifies how each of the statutory Strategic Environmental Assessment topics has been addressed in the Sustainability Appraisal Framework.

Table 10: Stage A4 – Sustainability Objectives

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainable Community Strategy	Sustainability Objective (stage A4)
1. Living within environmental limits (natural resource protection and enhancement)				
Biodiversity – work with the grain of nature to protect, create, restore and enhance habitats, species and sites of geological interest	**Habitats** – 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	Biodiversity, fauna and flora Cultural heritage and landscape	**Investing in environmental quality** – ensure that new development enhances biodiversity; work to conserve and enhance biodiversity	**BIODIVERSITY** 1. Protect, restore, create and enhance habitats, species and sites of wildlife or geological interest
Climate change – reduce carbon emissions through improving energy efficiency and promoting renewable sources of energy, and reduce vulnerability to the impacts of climate change	**CO2 emissions** – electricity use and CO2 emissions are rising, rather than falling in line with national targets	Climatic factors Air Biodiversity, fauna and flora Material assets	**Tackling climate change** – 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.	**CLIMATE CHANGE** 2. Reduce carbon emissions, striving for a carbon neutral borough
	Renewable energy generation – 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

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainable Community Strategy	Sustainability Objective (stage A4)
Water – conserve water resources and reduce pollution, flood risk and surface water run-off	**Flooding** – significant risks from flooding, especially with changing climate	Water and soil Climatic factors	**Investing in environmental quality** – need to ensure infrastructure and built and natural environmental assets are resilient to weather extremes such as water shortages and flooding	**WATER** 4. Manage and reduce flood risk and surface water run-off
	Water consumption – residents making good progress by consuming less water than UK average but climate change could impact on resources **River quality** – very poor biological and reducing chemical river qualities			5. Reduce water use and conserve and improve water resources
Transport – 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	**Transport** – increasing traffic volumes, cycling, walking and Park and Ride use high, but public transport use is below average	Population and human health Air Climatic factors Material assets	**Investing in travel and transport** – action to encourage cycling, walking and good public transport and to reduce car use to reduce congestion and carbon emissions **Promote sustainable living** – foods and goods produced locally are readily available	**TRANSPORT** 6. Reduce the need to travel
	Car ownership – while the number of households with 2 or more cars is high, the number without access to a car is also significant ROAD TRAFFIC CASUALTY DATA NEEDED			7. Maximise the use of sustainable and safe modes of transport
Land resources – protect good quality land and soil, enhance sensitive and valued landscapes and encourage recycling of previously developed land and buildings	**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	Biodiversity, fauna and flora Cultural heritage and landscape Water and soil Material assets	**Promote sustainable living** – make the most efficient and appropriate use of land	**LAND RESOURCES** 8. Maximise appropriate reuse of previously developed land
				9. Minimise development of open land and green spaces within Cheltenham
	Land designated as AONB or Green Belt – plays an important role in protecting the unique setting and landscape character of Cheltenham		**Investing in environmental quality** – 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	10. Protect and enhance the unique setting and landscape character of Cheltenham

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainable Community Strategy	Sustainability Objective (stage A4)
Waste – reduce the amount of waste produced and encourage recycling and reuse to decrease the volume needing to be landfilled in line with the waste hierarchy	**Waste and recycling** – although recycling and composting rates are improving, they still lag behind national averages	Climatic factors Water and soil	**Promote sustainable living** – little waste sent to landfill and most is re-used, recycled and composted	**WASTE** 11. Minimise the volume of waste created and promote reuse, recycling and composting to reduce landfill
Built environment – encourage a safe, clean and attractive environment and protect, enhance and improve understanding of the historic heritage	**Conservation Areas and Listed Buildings** – significant conservation area coverage and high numbers of listed buildings	Cultural heritage and landscape Material assets	**Investing in environmental quality** – promote quality of design in the public realm	**BUILT ENVIRONMENT** 12. Protect and enhance Cheltenham's distinctive townscape quality and its historic heritage
Pollution – reduce risks to health and the environment by reducing air and noise pollution and contaminated land	**Pollution** – although air quality is not a significant issue, light pollution levels are saturated	Population and human health Water and soil Air Material assets	**Investing in environmental quality** – support improved cleanliness and maintenance of the public realm	**POLLUTION** 13. Improve air and soil quality and reduce noise and light pollution and the amount of contaminated land
2. A sustainable economy (sustainable consumption and production)				
2A. Economic development – encourage sustainable economic and tourism growth which ensures high quality employment opportunities, a skilled workforce and prosperity without harming environmental quality	**Maintaining a strong economy** – need to ensure that new and existing businesses have opportunities to expand and develop sustainably	Population and human health Climatic factors Water and soil Material assets	**A strong and sustainable economy** – ensure a vibrant and sustainable low carbon economy with a diverse employment base and a commitment to excellence and innovation – 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	**ECONOMIC DEVELOPMENT** 14. Support Cheltenham's economy by helping new and existing businesses to deliver sustainability
	Loss of employment land – despite a thriving economy the amount of land used for employment purposes is declining			**EMPLOYMENT LAND AND PREMISES** 15. Ensure the availability of land and premises to secure the future prosperity of Cheltenham
	CO2 emissions from employment premises – CO2 emissions and electricity consumption within business sector are increasing steadily		**A strong and sustainable economy** – reduce the carbon footprint of existing economic activity	16. Encourage low carbon economic growth which improves prosperity while respecting environmental limits
	Unsustainable lifestyles – Cheltenham has a high ecological		**Tackling climate change** – all residents, businesses and	**USE OF NATURAL RESOURCES**

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainable Community Strategy	Sustainability Objective (stage A4)
	footprint		community organisations do their bit to live within the environmental limits of the planet	17. Support people and existing businesses in reducing their carbon footprint and the use of natural resources
	Workforce issues – supporting Cheltenham's highly skilled workforce and keeping unemployment levels low through a range of job opportunities to meet the changing needs of the population		**A strong and sustainable economy** – work to provide a first class education system to ensure skills development and lifelong learning opportunities are available to all residents to enhance their economic prosperity and quality of life	**EDUCATION AND SKILLS** 18. Support the development of accessible education, skills and learning to meet the needs of both employers and the working population
	Population – fewer children could mean a smaller workforce in future			
	Lifelong learning – educational attainment generally well above UK average			
2B. Town centre – promote the vitality and viability of the town centre	**Reinforcing the town centre** – ensuring that Cheltenham's key role as a retail, service, leisure and learning destination is strengthened	Population and human health Cultural heritage and landscape Material assets	**Investing in arts and culture** – take action to maintain our vibrant and stimulating cultural life; ensure the borough continues to play an important role nationally and worldwide in terms of its contribution to arts and culture	**TOWN CENTRE** 19. Support the vitality and viability of Cheltenham town centre as a retail, service, leisure and learning destination
				20. Protect and enhance Cheltenham's vibrant cultural life
2C. Sustainable construction – promote more sustainable methods of construction to reduce resource and energy use and waste	**Sustainable construction** – only a few schemes have been built to good eco building standards and the government agenda is moving swiftly	Biodiversity, fauna and flora Population and human health Water and soil Air Climatic factors Cultural heritage and landscape Material assets	**Sustainable living** – encourage and support sustainable construction processes	**SUSTAINABLE CONSTRUCTION** 21. Integrate sustainable construction principles and standards into all development schemes

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainable Community Strategy	Sustainability Objective (stage A4)
3. A strong, healthy and just society (sustainable communities)				
3A. Social cohesion – reduce inequalities in health, education and learning, employment opportunities, crime and environmental quality and promote a more inclusive society, locally and globally	**Deprivation** – nearly a tenth of the population living in highly deprived areas, 16% children in households on benefits	Population and human health Climatic factors Air	**Building stronger communities** – support community regeneration in areas of multiple deprivation. Work in partnership to tackle health inequalities. Promote lifelong learning opportunities for all	**SOCIAL COHESION** 22. Reduce inequalities in wellbeing and opportunity 23. Promote more inclusive and self-contained communities to reduce the need to travel for everyday requirements
3B. Health – improve mental and physical health and wellbeing and reduce inequalities	**Health** – generally good, although suicide rates are high	Population and human health	**Building healthy communities** – equitable access to locally-provided community based health and care services	**HEALTH** 24. Improve the physical and mental health and wellbeing of local residents, with good access to community health facilities
3C. Housing – 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	**Population** – growing slowly with most of increase in working age population, number of households increasing **Affordability** – house prices risen dramatically and fewer affordable homes available **Housing stock** – despite high levels of house building, little new housing is affordable and number of empty and second homes remains high GAP – fuel poverty?	Population and human health Material assets	**Supporting housing choice** – a choice of sustainable, quality, accessible and well-managed affordable homes **Supporting older people** – promote independent living for older people	**HOUSING** 25. 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
3D. Green space – retain, create and enhance open spaces for recreation and sport to improve wellbeing	**Allotments** – growing demand for allotments, for food production but number of sites is decreasing	Biodiversity, fauna and flora Climatic factors Population and human health	**Investing in environmental quality** – parks and open spaces managed to reduce resource use and encourage wildlife; promote importance of gardens to local amenity	**GREEN SPACE** 26. Protect and enhance open spaces, gardens and allotments for leisure and recreation, including creating opportunities for wildlife and local food production
3E. Community safety and	**Crime rates** – high crime rates for violent	Population and human	**Promoting community safety** – ensure residents	**COMMUNITY SAFETY AND**

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainable Community Strategy	Sustainability Objective (stage A4)
empowerment – reduce crime levels and improve understanding and ownership of the local area and participation in decision making	offences, domestic and vehicle crime reducing, as is fear of crime	health	feel safe and that crime and disorder is kept to a minimum	**EMPOWERMENT** 27. Reduce crime and the fear of crime
	Citizenship – good levels of democratic participation		**Principle of community engagement** – a place where all our communities feel engaged and where there is participation by local people, groups and businesses	28. Encourage everyone to participate in local decision making, ensuring that long term impacts are considered

8.5 The next stage in the development of the Sustainability Appraisal Framework is determining a series of **Decision Aiding Questions**, which should assist the assessment process when the whole Framework is used to appraise the policies and options contained in the Core Strategy for their social, environmental and economic effects. Following on from these a number of detailed **Potential Detailed Indicators** to monitor and review performance need to be identified.

8.6 The Sustainability Objectives, Decision Aiding Questions and Potential Detailed Indicators are drawn together in Table 11 below.

8.7 The SA Framework will be used to assess the impact of each potential policy and option/proposal within the Core Strategy. The predicted impact of each option/proposal will be based on the following scoring system:

- ✓✓ Significant positive contribution
- ✓ Positive contribution
- O No negative impact
- X Negative impact
- XX Significant negative impact
- ? Uncertain impact

8.8 When used as a matrix for assessing the impact of policies and options, the SA Framework will allow the effect of each option/proposal to be predicted according to timescale (i.e. short, medium or long term effect) and will identify the likelihood of any potential effect, its geographic scale, the significance of the effect and whether it is likely to be a permanent or temporary effect. The results of the assessment process will be shown using a matrix which includes 'traffic light' colour coding.

Table 11: The Sustainability Appraisal Framework

Sustainability Objective (Stage A4)	Decision Aiding Questions Will the core strategy…	Potential Detailed Indicators
BIODIVERSITY 1. Protect, restore, create and enhance habitats, species and sites of wildlife or geological interest	• Ensure that habitats and sites of wildlife or geological interest are protected, restored and enhanced? • Promote the creation of new habitats and sites of wildlife interest?	• Quantity of designated LNR (and area of land) • Proposed LNRs (and area of land) • Area of designated local nature reserves/per1000 population • Area of SSSI land in – favourable condition; unfavourable and declining; unfavourable and static; unfavourable but recovering • Important habitats • Number of key wildlife sites and area • Net increase/decrease in trees • New/replacement trees on CBC land
CLIMATE CHANGE 2. Reduce carbon emissions, striving for a carbon neutral borough	• Reduce dependency on fossil fuels? • Reduce carbon emissions from new and existing buildings and increase energy efficiency? • Increase proportion of energy both purchased from and generated by renewable energy? • Encourage microgeneration?	• Total CO2 emissions for Cheltenham • Total CO2 emissions per capita • Estimated domestic CO2 emissions • Estimated domestic CO2 emissions per capita • Average annual domestic consumption of electricity per consumer • Average annual domestic sales of gas per consumer
3. Improve the resilience of people, businesses and the environment to the inevitable consequences of climate change	• Ensure new and existing buildings, infrastructure and the environment are resilient to the effects of extreme weather events? • Help people, businesses and the environment to adapt to the physical and social impacts of climate change?	• MW of installed renewable electricity in Gloucestershire • MW of installed renewable heat capacity • Developments meeting Code for Sustainable Homes (and previously EcoHomes) or BREEAM standards
WATER 4. Manage and reduce flood risk and surface water run-off	• Ensure flood risk is reduced? • Ensure that development does not increase surface water run-off? • Ensure that surface water run-off is slowed and absorbed? • Support Sustainable Urban Drainage? • Help adaptation to the reality and aftermath of flooding?	• Area of land in floodplain • Percentage of borough in floodplain • Area liable to flood • Surface water run-off • Groundwater flooding • Developments incorporating sustainable drainage systems • Number of properties at risk from flooding
5. Reduce water use and conserve and improve water resources	• Ensure that water use is reduced? • Maximise water collection opportunities? • Conserve water resources? • Improve the quality of water (both ground and river)?	• Daily domestic water use (per capita consumption) • Rainwater harvesting schemes • % of km of river achieving cat A (good biological quality) • % of km of river achieving cat B (good chemical quality) •

Sustainability Objective (Stage A4)	Decision Aiding Questions Will the core strategy…	Potential Detailed Indicators
TRANSPORT 6. Reduce the need to travel	• Reduce the frequency and duration of journeys? • Reduce the need to travel by improving access to services, jobs, leisure and amenities?	• Average daily traffic flow on principal roads • Estimated traffic flows for all vehicle types • Containment rate
7. Maximise the use of sustainable and safe modes of transport	• Maximise opportunities for cycling, walking and public transport? • Reduce the use of high carbon modes of transport? • Reduce road traffic accidents?	• Estimated CO2 emissions for road transport • Local bus services: no of park and ride tickets sold; number of bus trips • Travel to work data: % cycling; % walking; % using public transport; % reliant on the car • Estimate traffic flows for all vehicle types • Car ownership: no car; 2+ cars • Road traffic casualties
LAND RESOURCES 8. Maximise appropriate reuse of previously developed land	• Encourage the development of previously developed land? • Reduce the number of vacant and derelict buildings?	• % new homes built on previously developed land • Number of dwellings empty for over 6 months
9. Minimise development of open land and green spaces within Cheltenham	• Minimise development of open land and green spaces within Cheltenham, including gardens to protect biodiversity and opportunities for local food production?	• % of gardens built on) data not yet • Green space data) available
10. Protect and enhance the unique setting and landscape character of Cheltenham	• Protect and enhance the special character of the Cotswolds AONB? • Protect the unique setting of Cheltenham and prevent merging with other settlements? • Protect and enhance the landscape character surrounding Cheltenham?	• Area of Cotswolds AONB in the borough • Area of Green Belt in the borough
WASTE 11. Minimise the volume of waste created and promote reuse, recycling and composting to reduce landfill	• Minimise the volume of waste created during construction (including demolition waste)? • Minimise waste created during occupation? • Maximise reuse, recycling and composting of waste? • Dispose of waste in a sustainable manner?	• % domestic waste land filled, recycled and composted • Kg of waste collected per head per annum • Waste arisings per sector (NEW INDICATOR?)
BUILT ENVIRONMENT 12. Protect and enhance Cheltenham's distinctive townscape quality and its historic heritage	• Protect and enhance Cheltenham's historic heritage? • Promote good design that enhances Cheltenham's distinctive public realm?	• % of land designated as conservation area • No of conservation areas • Percentage of conservation areas with up-to-date character appraisals/management proposals • No of listed buildings

Sustainability Objective (Stage A4)	Decision Aiding Questions Will the core strategy…	Potential Detailed Indicators
POLLUTION 13. Improve air and soil quality and reduce noise and light pollution and the amount of contaminated land	• Reduce air pollution? • Reduce light and noise pollution? • Improve the quality of contaminated land? • Minimise loss of soils to development and improve soil quality?	• Light pollution • Air quality management areas • No sites of potential concern with respect to contamination • Air quality monitoring information
ECONOMIC DEVELOPMENT 14. Support Cheltenham's economy by helping new and existing businesses to deliver sustainability	• Enhance Cheltenham's economy? • Provide opportunities for new and existing businesses to develop in a sustainable way?	• Business stock • New firms - % of stock • GAP – indicator needed on delivering sustainability
EMPLOYMENT LAND AND PREMISES 15. Ensure the availability of land and premises to secure the future prosperity of Cheltenham	• Protect and enhance the vitality and viability of existing employment areas? • Ensure the provision of adequate land and premises to meet the needs of existing and new businesses?	• Availability of employment land
16. Encourage low carbon economic growth which improves prosperity while respecting environmental limits	• Ensure that new economic activities minimise impact on carbon emissions? • Support low carbon innovations and environmental technologies?	• Estimated CO2 emissions for industrial and commercial sector • Average annual industrial/commercial gas sales per consumer • Average annual industrial/commercial electricity sales per consumer • Business stock • New firms – % of stock • NEW INDICATORS? – start up and business survival rates, GVA over economic cycle?
USE OF NATURAL RESOURCES 17. Support people and existing businesses in reducing their carbon footprint and the use of natural resources	• Support people and businesses in reducing their carbon footprint and the use of natural resources, both globally and locally? • Support procurement of local goods and services?	• Cheltenham's ecological footprint – global hectares per person
EDUCATION AND SKILLS 18. Support the development of accessible education, skills and learning to meet the needs of both employers and the working population	• Support the provision of accessible education, training and upskilling opportunities? • Support the provision of an appropriately skilled workforce to meet the needs of existing and future businesses? • Support the creation of flexible jobs to meet the changing needs of the population?	• % of population of working age • % of working age population that is economically active • 16-74 yr olds with no qualifications • 16-74 yr olds with degree or equivalent • % of 15 year-olds getting five or more GCSEs at grades A* to C in Glos • Working age with no skills • Skills: NVQ4 or higher

Sustainability Objective (Stage A4)	Decision Aiding Questions Will the core strategy…	Potential Detailed Indicators
	• Support community enterprises and the voluntary sector?	• % of workforce in professional/managerial work • Job density (ratio of jobs per person of working age) • NEW INDICATORS? – unemployment rates by sex, lone parents and ethnic groups, no. of childcare places per 100 children?
TOWN CENTRE 19. Support the vitality and viability of Cheltenham town centre as a retail, service, leisure and learning destination	• Support the vitality and viability of Cheltenham town centre as a retail, service, leisure and learning destination? • Enhance the quality of the public realm?	• Retail footprint ranking • % employed in tourism related industries
20. Protect and enhance Cheltenham's vibrant cultural life	• Protect and enhance Cheltenham's vibrant cultural life?	• % contribution of festivals to total business turnover
SUSTAINABLE CONSTRUCTION 21. Integrate sustainable construction principles and standards into all development schemes	• Ensure that sustainable construction principles and standards are integrated into all development schemes, aiming for the highest standards possible? • Encourage retrofitting of sustainable construction measures to existing buildings?	• Developments meeting Code for Sustainable Homes (and previously EcoHomes) or BREEAM Standards
SOCIAL COHESION 22. Reduce inequalities in wellbeing and opportunity	• Help to reduce inequalities in wellbeing and opportunity? • FFF comments	• % of population living in most deprived Super Output Areas (worst 25%) • % of children under 16 living in low-income households • % of children and people over 60 living in income deprived households • % of unemployed people as at August each year • % of unemployed people claiming benefits who have been out of work for more than a year • Percentage of working age population seeing job seekers allowance
23. Promote more inclusive and self-contained communities to reduce the need to travel for everyday requirements	• Support and enhance the role of local neighbourhood centres to meet everyday needs? • Encourage the provision of local services and facilities to help communities become more self-contained?	• Average daily traffic flow on principal roads • More indicators needed • Regional indicators required
HEALTH 24. Improve the physical and mental health and wellbeing of local residents, with good access to community health	• Help people to live healthy lifestyles and reduce obesity? • Ensure access to local health facilities? • Support improved levels of health care? • Encourage the development of	• Death rate by cause for every 100,000 people in the population – cancer in under 75s; circulatory diseases in under 75s; suicide; all accidents • Limiting illness • Infant mortality rate per 1000 live births • Life expectancy rates (3 yr averages) –

Sustainability Objective (Stage A4)	Decision Aiding Questions Will the core strategy…	Potential Detailed Indicators
facilities	healthy workplaces?	male; female • Road casualties (no killed or seriously injured, 3 year averages); pedestrians; cyclists; motorbike/scooter/moped; • NEW INDICATOR – prevalence of obesity?
HOUSING 25. 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	• Provide enough homes that people can afford? • Provide quality and flexible homes that meet people's needs? • Ensure that best use is made of the existing housing stock? • FF comments	• Household size • No of affordable housing and social rented properties – CBC • No of affordable homes enabled within borough boundary • Number of people who are homeless • Average house price to average income ratio • Average house prices in Cheltenham • Gross weekly pay • Total number of new housing completions and % affordable • No of dwellings that have been empty over 6 months • No of second homes on council tax register • NEW INDICATOR – average density of new housing?
GREEN SPACE 26. Protect and enhance open spaces, gardens and allotments for leisure and recreation, including creating opportunities for wildlife and local food production	• Ensure existing open spaces, gardens and allotments are protected and enhanced? • Support the provision of new green space which includes opportunities for wildlife and local food production and improved access for recreation and leisure? • Integrate SUDS into green space?	• No allotment plots • % tenanted allotments • % of gardens built on) data not yet • Green space data) available • NEW INDICATORS? – Proximity to green space, net loss/increase in open space?
COMMUNITY SAFETY AND EMPOWERMENT 27. Reduce crime and the fear of crime	• Reduce opportunities for crime? • Make people feel safer through good design? • Reduce actual levels of crime and fear of crime? • Reduce anti-social behaviour?	• No of report crimes per 1000 households – domestic burglaries; violent offences (per 1000 popn); vehicle crime (per 1000 popn) • % of residents that feel fairly safe or very safe – outside after dark; outside during the day
28. Encourage everyone to participate in local decision making, ensuring long term impacts are considered	• Enable everyone to participate in local decision making? • Help people to feel positive about the area they live in? • Fully consider the impacts for the lifetime of the strategy and for future generations? • Appraise, monitor and review outcomes effectively?	• % or electoral voting at last election • % of people who feel they can influence decisions affecting their local area – as individuals; working together

CHAPTER 9. REMAINING STAGES OF APPRAISAL

9.1 Sustainability Appraisal is an iterative and ongoing process that is broken down into a number of stages that coincide with stages in the development and adoption of a Development Plan Document. This staged approach to the production of a final Sustainability Appraisal Report helps to refine the Development Plan Document objectives and ensures that the preferred policy options selected will both achieve these objectives and achieve sustainable development objectives.

9.2 The remaining stages of the Sustainability Appraisal process are shown in Figure 2 (overleaf) and in Table 4 on page 12 of this report.

STAGE A5 - CONSULTATION OF THE SCOPING REPORT (see Table 4)

9.3 Government guidance on the preparation of Sustainability Appraisals and the Strategic Environmental Assessment Directive specify that Scoping Report must be prepared in consultation with:

- Natural England
- The Environment Agency
- English Heritage

9.4 Full consultation with the public is not required by the government at this stage, although a number of stakeholders were given the opportunity to comment and the Scoping Report was placed on the Council's website and updated in light of consultation responses as appropriate.

9.5 In December 2007 an informal workshop was held with members of the Local Development Framework Programme Board and the Low Carbon Partnership (a thematic partnership of Cheltenham Strategic Partnership). The purpose of the workshop was to test the emerging Sustainability Appraisal Framework, and in particular the sustainability objectives, with local stakeholders. As well as general consideration of the objectives and decision aiding questions, some hypothetical policy options were used to pilot the framework, resulting in some changes to the both the process used and content of the objectives.

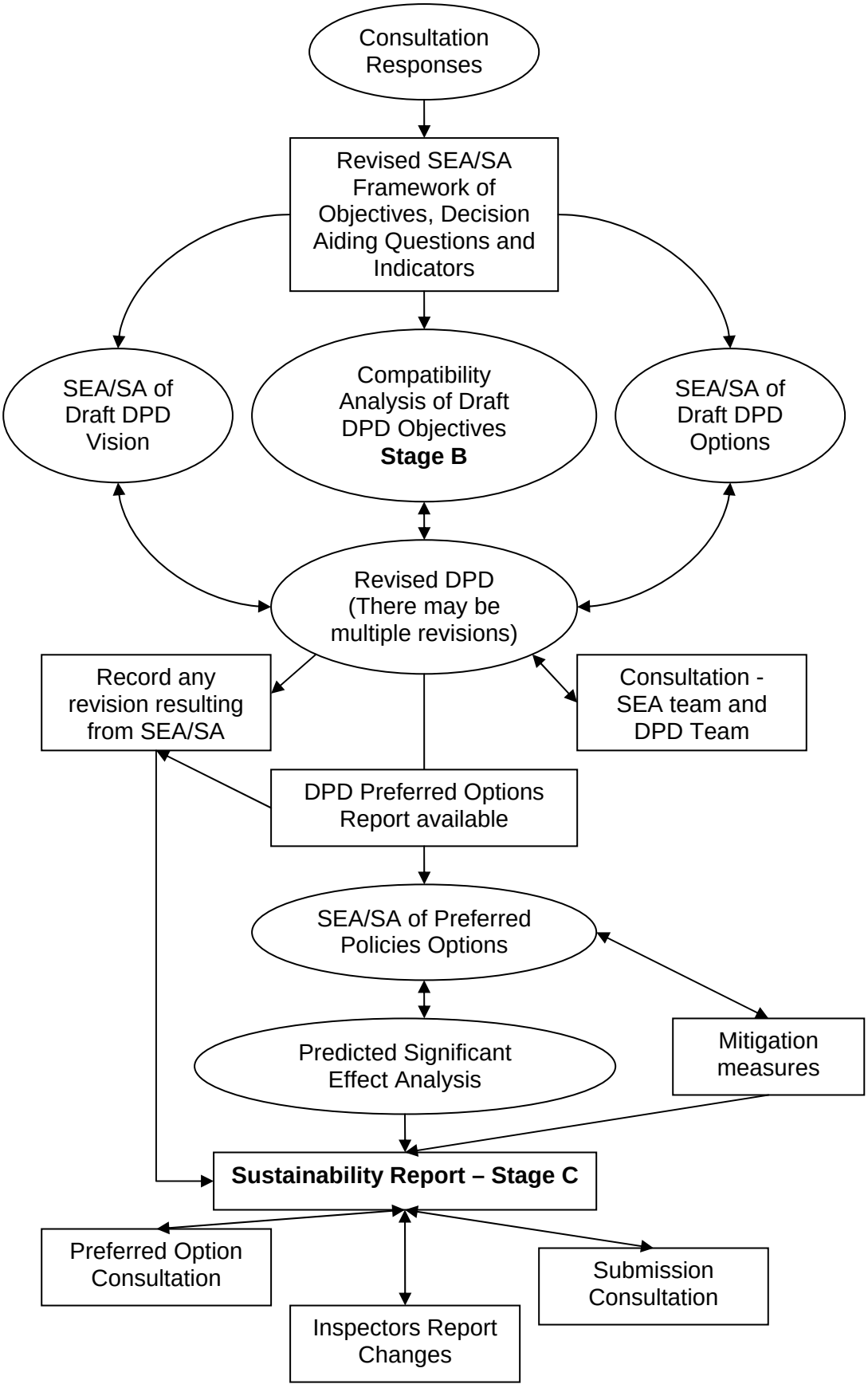


Figure 2: Diagram of the Sustainability Appraisal Process Stages B, C and D

REVISED SUSTAINABILITY APPRAISAL FRAMEWORK

9.6 The Sustainability Appraisal Framework has been revised to take account of any representations received as a result of consultation with the three statutory consultees and other organisations and individuals. This revised Framework will form the framework against which the vision, objectives and policy options of the Core Strategy will be measured.

CORE STRATEGY VISION AND OBJECTIVE TESTING

9.7 The Core Strategy should be a visionary document that will form the strategic framework for the Cheltenham Local Development Framework and the future development of the borough and its environs. To achieve its vision, the Core Strategy will develop a set of objectives that it will aspire to. Once these objectives are available, they will be tested against the Sustainability Appraisal Framework to ensure they are compatible with the aims of sustainable development.

9.8 If there is conflict between the Core Strategy objectives and the achievement of sustainable development a judgment will be made about which objectives are most important for the future development of the Cheltenham Borough and what mitigating measures are required to off set any adverse effects. If such decisions and judgments are necessary then they will be fully documented in the final Sustainability Appraisal Report.

APPRAISAL OF CORE STRATEGY POLICY OPTIONS

9.9 It is necessary during the early stages of the Core Strategy's development to consider a wide range of policy options. A Sustainability Appraisal of this range of policy options should identify a wide range of implications for the achievement of sustainable development and assist the identification of the most sustainable policy option and possible mitigation measures to off set any adverse impacts. This will be reported in the Sustainability Appraisal Report.

APPRAISAL OF PREFERRED OPTIONS AND PREDICTED SIGNIFICANT EFFECT ANALYSIS

9.11 Once the preferred policy options for the Core Strategy have been agreed, the social, economic and environmental effects of implementing these policies - and any other viable policy alternatives - can be predicted. These **Predicted Significant Effects** will be reported in the Sustainability Appraisal Report.

9.12 Once the Predicted Significant Effects of implementing a policy option have been identified they then need to be subject to a **Predicted Significant Effect Analysis** to ascertain the Magnitude, Significance, Duration, Probability, Reversibility and the Potential for Cumulative Effects of the effect. Mitigation measures should be outlined for any adverse effects of implementing the policy.

INSPECTORS REPORT AMENDMENTS

9.13 The Core Strategy will be the subject of an Examination in Public presided over by a planning inspector. The inspector will consider the Core Strategy and supporting documents, including the Sustainability Appraisal Report, and may insist that the Core Strategy be amended. Any amendments will also be subject to Sustainability

Appraisal and the results will be recorded in a Final Sustainability Appraisal Report that will accompany the Core Strategy as it is adopted.

MITIGATION MEASURES

9.14 At each stage of the Core Strategy's development the Sustainability Appraisal process will include recommendations for any necessary mitigation measures to prevent, reduce or offset any predicted negative affects that implementation of the Core Strategy may produce. Mitigation measures could include making changes to Core Strategy policies, developing additional planning policies, requiring additional measures to be applied when implementing particular policies, suggesting changes to other policies, plans or programmes and requiring an Environmental Impact Assessments to accompany some planning applications.

MONITORING AND REVIEW

9.15 This document has sets the baseline for the Sustainability Appraisal of the Cheltenham Core Strategy. From the baseline data and review of relevant plans, policies and programmes a number of Sustainability Objectives have been developed. Progress towards these objectives will be monitored annually using the Decision Aiding Questions and Potential Detailed Indicators set out in the Sustainability Appraisal Framework.

9.16 The results of this monitoring will be included in the Annual Monitoring Reports that must be submitted to the Government Office for the South West every December.

9.17 The purpose of this monitoring is to identify where planning policy is not contributing to sustainable development and to allow action to be taken before damage is done to the local environment, economy or community. If monitoring shows that progress is not being made towards the achievement of Sustainability Objectives, changes will be made to the way planning policy is being implemented or selected policy areas will be brought forward for review within the Local Development Scheme.

APPENDIX 1 – Relevant Plans, Policies and Programmes

APPENDIX 2 – Baseline Data Tables

APPENDIX 3 – Quality Assurance Checklist

APPENDIX 3

QUALITY ASSURANCE CHECKLIST

(Source – ODPM Guidance 2005 Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, Appendix 4)

Quality Assurance checklist	
Objectives and context	**Status in Scoping Report**
The plan's purpose and objectives are made clear.	✓Included in Chapters 1 and 2
Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	✓Included in Chapters 6 and 8
SA objectives are clearly set out and linked to indicators and targets where appropriate.	✓Included in Chapter 8, targets to be included in subsequent SEA processes
Links with other related plans, programmes and policies are identified and explained.	✓Included in Chapter 6
Conflicts that exist between SA objectives, between SA and plan objectives, and between SA and other plan objectives are identified and described.	To include in full Appraisal Report
Scoping	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report.	✓Consultation undertaken in January 2008
The appraisal focuses on significant issues.	✓Included – Chapters 6 and 7 focus on issues of significance to Cheltenham
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	✓Included – Chapters 3-8 include details of any assumptions and uncertainties
Reasons are given for eliminating issues from further consideration.	✓Included – Chapters 3-8 explain why certain issues are eliminated
Options/Alternatives	
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	To include in full Appraisal Report
Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant.	
The sustainability effects (both adverse and beneficial) of each alternative are identified and compared.	
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	
Reasons are given for selection or elimination of alternatives.	
Baseline information	
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	✓Included in Chapter 7
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.	To include in full Appraisal Report
Difficulties such as deficiencies in information or methods are explained.	✓Included in Chapters 7 and 8

Quality Assurance checklist	
Prediction and evaluation of likely significant effects	
Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant.	✓Included in Sustainability Framework in Chapter 8
Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.	✓Should be flagged up during assessment process, using SA Framework
Likely secondary, cumulative and synergistic effects are identified where practicable.	To include in full Appraisal Report
Inter-relationships between effects are considered where practicable.	
Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.	
Methods used to evaluate the effects are described.	
Mitigation measures	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are indicated.	To include in full Appraisal Report
Issues to be taken into account in development consents are identified.	
The Sustainability Appraisal Report	
Is clear and concise in its layout and presentation.	To include in full Appraisal Report
Uses simple, clear language and avoids or explains technical terms.	
Uses maps and other illustrations where appropriate.	
Explains the methodology used.	
Explains who was consulted and what methods of consultation were used.	
Identifies sources of information, including expert judgement and matters of opinion.	
Contains a non-technical summary.	
Consultation	
The SA is consulted on as an integral part of the plan-making process.	To include in full Appraisal Report
The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report.	✓Consultation with stakeholders undertaken in January 2008
Decision-making and information on the decision	
The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan.	To include in full Appraisal Report
An explanation is given of how they have been taken into account.	
Reasons are given for choices in the adopted plan, in the light of other reasonable options considered	

SEA Scoping Report for Core Strategy

Comments received and officer responses - July 2008

Topic	Issue Raised	Officer response*
Consultation meeting 6th February 2008 (Environment Agency and Natural England)		
Biodiversity	Queried the relevance of using the indicator relating to the area of SSSI land as the council has very little influence on this	Useful to include as indicates condition of SSSI land as well as total area, and progress towards government target. No action needed
	Should record *area* of key wildlife sites as well as number of sites	Included in Appendix 2. Action – include in main report
Water	Strategic flood risk assessment will be key to most of indicators	Agreed. Action – awaiting final SFRA
	Agreed useful to include data on developments with SUDS	Have asked CBC development control team to collect this data. Action – monitor data via Annual Monitoring Report when available
	Move DAQ on water quality to water section from pollution	Action - include this under the water section – will also link in with the water sustainability theme
	Groundwater quality is not covered – include under DAQ for objective 13 – 'Improve the quality of river and ground water'. Can put EA down as a potential source of data, but currently a gap	Action – include suggested alteration to DAQ and new indicator on groundwater quality with EA to provide data
	Under water consumption could include something on rainwater harvesting or grey water recycling	Action – include an indicator on rainwater harvesting schemes as gap – will need to resolve how to obtain data
Climate change	Is it possible to collect behavioural data?	Some behavioural data has been obtained for Cheltenham residents via the Viewpoint panel. This is several years out of date now and is not likely to be repeated. Data is included in Appendix 2. Action – none needed
Brownfield land	Need to acknowledge that brownfield land can be good for biodiversity	It was agreed at the meeting that this was covered within the associated DAQ. Action – none needed
Sustainable construct-ion	What about retrofitting for energy saving / renewable energy?	Action – include retrofitting of measures to existing buildings under objective 21 as a DAQ
Health	Could be more explicit about the impact of events like flooding on people's mental wellbeing. Could include explicitly under flooding, eg 'help people to adapt to the aftermath of flooding', but has a wider context. Consider expanding objective 24 to read 'Improve the health and physical and mental wellbeing of….'	Action – expand objective 24 to cover both physical and mental wellbeing
	Include obesity within health objective?	Action – include reducing obesity in DAQ for objective 24
Green space	Need an indicator on access to green space	Agreed, green space indicators are very poor, awaiting green space strategy, which is currently being developed. Action – include suitable indicators when available
	SUDS can make valuable contribution to green space, is there the potential to adopt SUDS as public open space through the green space strategy? Include SUDS in objective 26.	Action – raise through green space strategy development process. Include a DAQ on SUDS in objective 26.

* Outstanding issues shown shaded

Topic	Issue Raised	Officer response*
Habitats Regulations	Although 10 mile distance from a site is used as a measure for screening out, would depend on abstraction levels	Although there is a site within 5 km of the borough boundary, impact on abstraction levels has not been flagged up as a local issue in the RSS, Severn Catchment Abstraction Management Strategy or Water Resource Management Plan. Action – ensure that appropriate screening is undertaken if a joint core strategy is pursued.
	Big developments/urban extensions will impact on the Severn Estuary and Cotswold escarpment, so Habitats Regulations Assessment will be necessary at some point. Contact **Charlotte Padgenden** at Natural England for advice on Appropriate Assessment.	See above.
Environment Agency – letter dated 18th February 2008		
Sustainab-ility Themes	In the Biodiversity section, creating new habitats has been left out. We consider this should be worded as follows: *Biodiversity – work with the grain of nature to protect, restore, create and enhance habitats, species and sites of geological interest.* We are pleased that this theme/objective is not limited to just designated sites, but includes all areas of biodiversity interested.	Action – amend theme as suggested
	We strongly support the climate change theme/objective, particularly as it includes both mitigation and adaptation. The final PPS1 was published on 17th December 2007, consider including the final version in the scoping report.	Action – include final version of PPS1 in Appendix 1
	In the water section you should also include reference to your SPG on SuDS	Included in Appendix 1. Action – include SPG on SuDS in table 6
	There is a typo in the Waste section – the word 'encouraged' should be 'encourage', which slightly alters the meaning so needs correcting. There is a further typo in the section 3 header (social themes) where the word 'healthy' appears as 'heath'.	Action – correct two typing mistakes
Baseline Data Table 7a:	As a general comment the trends are more in the form of comments. One trend comment that we don't consider to be adequate is the comment for 'number of properties at risk from flooding'. This comment could be enhanced to read: *"Avoid locating inappropriate development in the floodplain through use of the Sequential Test, Exception Test and sequential approach advocated in PPS 25."*	Action – amend trend to include suggested text
	You have cited the EA as a source for data on surface water flooding and groundwater flooding. As discussed at the consultation meeting we have very limited information on this currently. The SFRA will help to inform this section of the report and fill in many of the gaps.	Action – awaiting SFRA, will attempt to fill gaps using data from this report, when available
Ground-water quality monitoring.	EA can provide information on the number of sites/ hectorage that has been remediated (cleaned up). We do have groundwater quality monitoring data however this is quite sparsely dispersed across our region. We are unlikely to have any data for Cheltenham as it is located mainly on a sands and gravels aquifer with limited bedrock (which is the type of geology where we conduct most of this monitoring.) If you pursue a Joint Core Strategy with Tewkesbury and Gloucester City this data may be relevant/available.	Although it sounds as if groundwater quality data for Cheltenham is not available it would still be useful to flag this up as a gap. Action – include as a gap in indicator data

Topic	Issue Raised	Officer response*
Gloucestershire County Council – letter dated 18th February 2008		
Minerals and Waste	The County Council as Waste Planning Authority welcomes Objective 9 – '*To minimise the volume of waste created and promote reuse, recycling and composting to reduce landfill*'. Maybe the 'waste hierarchy' could be specifically referred to.	Action – include mention of the waste hierarchy in the waste theme
	The County Council welcomes SA Objective 9, but maybe the waste hierarchy should be explicitly mentioned.	Mentioned in the theme and could make the objective over detailed.. No action needed
	SA Objective 21 could potentially refer to reducing levels of construction and demolition waste.	The DAQ for objective 11 on waste specifically mentions minimising construction and demolition waste. No action needed
	Page 17, under 'Waste' should refer to Gloucestershire's emerging Draft Waste Core Strategy and Gloucestershire's adopted Supplementary Planning Document *Waste Minimisation in Development Projects (September 2006).*	Action - include reference to these publications in Appendix 1 and Table 6
	On Page 18, under 'Sustainable construction' Gloucestershire's SPD *Waste Minimisation in Development Projects (September 2006)* should be listed and also included in Appendix 1.	Included in waste section, no need to duplicate in sustainable construction section. No action needed
	On page 29, it states that 'Gloucestershire has a lack of landfill space'. This is not strictly accurate. There is significant void space at Wingmoor Farm. However it is Government policy through the Landfill Tax and the Landfill Allowance Trading Scheme (LATS) that is making landfilling increasingly expensive.	Action – amend Appendix 2 and Table 7A to reflect this comment
Ecology	The SA Scoping report for the Core Strategy lists the sustainability objectives and themes. We are pleased to see that these include the conservation and enhancement of biodiversity and geodiversity. Reference to the forthcoming Green Space Strategy is made on page 8 and is an important evidence document for the Core Strategy and the SA.	Agree with these comments – no action needed
	We note that the need for a Habitats Regulations Assessment (HRA) is screened. If a joint Core Strategy emerges as necessary for new development across Cheltenham, Gloucester and parts of Tewkesbury and Stroud Districts then a HRA would certainly be needed.	Action – ensure that appropriate screening is undertaken if a joint core strategy is pursued
	On page 11 it is stated that the nearest European Site to the Borough is Bredon Hill. This is incorrect. The closest European site is Dixton Wood SAC in Tewkesbury Borough (c.5km north west of the Cheltenham Borough boundary). The Cotswolds Beechwoods SAC are a similar distance to the south west. Natural England will be able to advise further on this matter, but it is likely that there will be no significant effects on these sites	Agreed, nearest site is within 5 km, however it is considered that the core strategy will have no significant effect on this designation. Action – amend text.
Meeting with Forum for the Future and follow-up email February 2008		
General	The tone of the purpose of SA can be expressed in a more positive manner e.g: NTS 'which is designed to protect the environment from harm' could be changed to 'which is designed to enhance the environment when new plans are prepared'; instead of 1.5 '…. Core strategy objectives and policies do not conflict with the achievement of sustainable development', it could read 'policies promote the achievement of sustainable development.'	Action – make suggested changes

Topic	Issue Raised	Officer response*
	There is some repetition, particularly in explaining the SA process that could be cut down further e.g. 9.9 to 9.12. This will be particularly important for the full SA, which experience elsewhere shows, is prone to producing very large and cumbersome reports. By keeping it to a minimum, it will ensure that the focus remains on the findings and impact of the SA.	Text amended and reduced.
	It needs to include a quality assurance framework as specified in the ODPM guidance.	Action – include the framework (See appendix 4 of ODPM guidance – 82-84), as appendix 3
	The diagram on p.52 needs to specify sustainability report, rather than environment report.	Action – amend diagram
	Make the process as transparent as possible in the report e.g. by explaining that the themes were derived from national and regional drivers and objectives were developed to reflect the local, regional and national context.	Action – amend table 5 to reflect these suggestions
Consultat-ion	Paragraph 1.3 should include a reference to the workshop held in December. It reads as if the minimum is being adhered to. Outline what was covered at the workshop e.g. testing the objectives and decision aiding questions against policies but did not cover significant issues.	Action – include details of workshop in para 9.5
	A steering group should be put in place to oversee the full SA, comprising representatives from across the organisation, including any key external partners to drive the process and share and apply knowledge with colleagues.	Action – on hold, pending discussions on Joint Core Strategy
Sustainab-ility themes, framework and objectives	Table 10 is not actually the proposed framework which will be used to assess policies e.g. It does not actually outline the way in which each theme will be assessed e.g. a scoring system for the appraisal criteria. Rather, it contains the information required for and the links to SEA. Whilst this was useful during the scoping process, it precludes feedback on the full assessment process and increases the risk that not all with agree with, or understand the final methodology. This aspect is crucial to interpreting the significance of impacts and it would benefit from further explanation about how the effect will be assessed. It simply lists the criteria taken from the directive in 9.12. The assessment framework should include a scoring mechanism (without prescribing what type) that triggers significance. This should not result a cumulative score. We also recommend the use of colour coding and matrices to illustrate results and conflict.	Agreed, a scoring methodology should be included. Action – include a scoring mechanism with an indication of how it would be applied during the assessment process in Chapter 8.
	A diagram illustrating how the objectives were arrived at would be useful.	Action - New table setting out these stages to be included
	A number of suggested revisions to the objectives and questions are listed in an attachment to the response.	Action – Amend Table 10 to reflect the majority of the suggestions
	In addition, we would recommend merging all of the themes with the objectives ensuring that the final objective fully reflects the aspirations set out in the theme as this is not always the case e.g. transport.	Not convinced this accords with our methodology. Action – none needed
	Restructure the economic section into economic development, employment, education and skills and reword accordingly.	Action – implement suggested restructuring

Topic	Issue Raised	Officer response*
	Add an extra objective on governance. Example questions include: • To deliver objectives transparently over the long-term, following sound science and in an integrated manner. • Fully account for the implications of policy and practice on the lifetime of the development and future generations? • Pursue a cross-sectoral partnership approach wherever appropriate? • Ensure that relevant stakeholders and active organisations are involved in the development and implementation of decisions? • Appraise, monitor and review outcomes effectively? These objectives can then form a vital resource for Cheltenham and all further appraisals should draw from these. This will ensure consistency and enable comparability within the council.	Action – build into objective 28 and incorporate some of suggested DAQs
Sustainab-ility issues	Present the information in the same categories as the sustainability objectives for ease of reference. Within this, group according to the existing sub-headings.	Not convinced this accords with our methodology. Action – none needed
Evidence base	Merge table 7a with 7b, extrapolating any pertinent information from 7a that is not already in 7b e.g. trends and presenting the rest of the information from 7a in an appendix. This then becomes one complete table containing all environmental, economic and social issues.	Not convinced this accords with our methodology. Action – none needed
	Table 7a and 7b clearly extrapolates the issues from the trends identified.	Action – none needed
Links with other plans and programmes	The following additions would be useful: a reference to relevant targets from the specified plan or programme and a diagram illustrating the relationship to other categories of plans and programmes.	Action – include more targets when A1 is next reviewed
	Make reference to the objective within the SA framework so it is clear where the link has been made.	Trying to keep SA framework as simple as possible. Action - none needed