



The Cheltenham Plan

**INTEGRATED APPRAISAL
(Sustainability Appraisal; Strategic
Environmental Assessment; Health Impact
Assessment & Equality Impact
Assessment)**

November 2017

enfusion



Cheltenham Borough Council The Cheltenham Plan: Regulation 19

INTEGRATED APPRAISAL (IA) Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA)

Habitats Regulations Assessment (HRA) Report
is available separately

Integrated Appraisal Report November 2017

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Non-Technical Summary (NTS)

This is the NTS of the Integrated (Sustainability) Report

1. This is the Non-Technical Summary of the Integrated (Sustainability) Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an Integrated Appraisal (IA) for the Cheltenham Plan. This summary is an integral part of the Integrated Appraisal Report that accompanies the Local Plan for public consultation in November to December 2017. It provides an outline of the IA process and findings, including how the IA has influenced the development of the plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

The Cheltenham Plan

2. The currently adopted Cheltenham Borough Local Plan was prepared to cover the period 1991-2011. It is being replaced to address requirements of the National Planning Policy Framework (2012), the progress of the Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS), and changing local circumstances. The GCT JCS (plan period to 2031) provides the housing and employment needs for the Cheltenham Borough area including the strategic direction for development growth with strategic policies (Strategic, Core, Allocation, and Delivery). The Cheltenham Plan, covering the administrative area of Cheltenham Borough is part of a hierarchy of planning guidance, sitting underneath the higher level Joint Core Strategy and national planning guidance.
3. The GCT Joint Core Strategy includes land provided within the Cheltenham Borough area to accommodate about 10,917 new homes. This will be met through two strategic and cross-boundary urban extensions at North West Cheltenham and West Cheltenham; and the rest through smaller scale development meeting local needs in Cheltenham in accordance with its role as a Key Urban Area. The Cheltenham Plan, alongside the Joint Core Strategy, will provide the planning policies that will be used to guide and manage development over the plan period to 2031.
4. The Cheltenham Local Plan has been prepared in accordance with national planning requirements and informed by various technical studies, the Integrated Appraisal, and consultation with the public, stakeholders and the regulators. The Cheltenham Plan sets out the key challenges for the Cheltenham Borough area with a proposed Vision for the development until 2031 and Objectives to address key issues and to help deliver the Vision.
5. The Cheltenham Plan seeks to provide local detail that supports the strategic elements of policy contained within the GCT JCS around three primary issues; site allocations within the Borough (outside of the strategic allocations in the

JCS), a local economic strategy, and provision for local infrastructure (particularly local green space). These three primary issues informed the initial draft the Plan (Local Plan Part One Preferred Options, October 2016) with nine proposed Policies (five covering economic factors, including local employment allocations, two covering local green space, and a further two addressing local housing and mixed-use development allocations).

6. Comments received on the Cheltenham Plan (Part One) were taken into consideration in the preparation of the draft Plan for Regulation 19 consultation. The draft Plan has refined the proposed site allocations and included the development management policies, organised into sections covering topics as follows: Employment; Design; Green Belt; Landscape; Historic Environment; Residential; Housing Mix & Standards; Gypsies, Travellers & Travelling Showpeople; Health & Environmental Quality; Transport; Green Infrastructure; Social & Community Infrastructure; and Housing.
7. These policies, alongside the policies contained within the GCT JCS, will guide the planning and management of growth and development in the Cheltenham area to accommodate the necessary new housing and jobs whilst protecting important and valued environmental assets, including the historic heritage and biodiversity.

Integrated Appraisal (IA): SA, SEA, EqIA and HRA

8. The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
9. Cheltenham Borough Council commissioned independent specialist consultants, Enfusion, to progress the appraisal work in May 2015. For the SA of the Cheltenham Plan, an integrated process has been undertaken that also addresses health and equality issues alongside the requirements of the Habitats Assessment Regulations (HRA) (HRA Report available separately). The findings of the health/equality and habitats assessments have been integrated into the SA. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the GCT Joint Core Strategy.
10. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope, the Integrated

(Sustainability) Appraisal (IA) is prepared and includes an IA Framework of objectives for sustainable development in the Cheltenham Borough area, and which forms the basis against which the Cheltenham Plan is assessed.

Sustainability characteristics of the Cheltenham area and likely evolution without the Cheltenham Plan

11. Cheltenham is characterised by rich historic townscapes (containing highly valued designated and non-designated heritage assets), and valued landscapes. A significant part of the Borough lies within the Cotswolds Area of Outstanding Natural Beauty (AONB). The area has a strong economic base, with major employers such as GCHQ, two University sites, and strong tourism attractions such as Cheltenham Racecourse. The majority of businesses within the Borough are within the service sector, and average weekly earnings are higher in the Borough than found in the South West. The health of residents in Cheltenham is generally better than the England average, and deprivation is lower than the England average. Life expectancy for both men and women is higher than the England average, though inequalities across the Plan area exist. House prices are relatively high with an overall average house price of £311,502.
12. The whole of Cheltenham Borough is a designated Air Quality Management Area, and the Borough has high rates of residents who travel to work by car (higher than national average). The M5 motorway is the busiest route in the county and is located to the west of the Borough. Cheltenham also has a railway station in which main routes create connections with Gloucester, London, Birmingham and Bristol. There is much room for improvement in renewable energy provisions within the Borough. Key biodiversity sites include Sites of Special Scientific Interest (SSSIs) and local sites such as Local Nature Reserves and Key Wildlife Sites. Areas of the Borough are susceptible to flood risk.

Key Sustainability Issues, Problems and Opportunities

13. The key sustainability issues that were identified during the IA Scoping stage are summarised in the table below.

| Key Sustainability Issues |
|---|
| <ul style="list-style-type: none"> ■ Maintaining and where appropriate, improving the quality of water bodies in the Borough (particularly the Rivers Chelt, Swilgate and Hatherley Brook) ■ Reducing the demand for water resources ■ Reducing the risk of flooding, particularly from surface water runoff, in new development and the impacts of flooding on existing development ■ Protecting and enhancing biodiversity where possible and required by legislation, and creating connections between existing and new GI and biodiversity sites ■ Maintaining and enhancing green/blue corridors to support the movement of |

people and biodiversity

- Valuing local participation and responding to local views (e.g. designating locally valued green spaces identified through consultation, in the emerging Plan)
- The sensitivity of historic environment
- The promotion and enhancement of the cultural heritage of Cheltenham
- Protecting and enhancing designated and non-designated heritage assets and their settings, including archaeology
- Protecting and enhancing the landscape, in particular the Cotswolds AONB and its setting
- Protecting limited agricultural land supplies in the Borough
- Promoting development on previously developed land
- Protecting the Green Belt to avoid the coalescence of Cheltenham with Gloucester and Bishop's Cleeve
- Improving air quality in the Borough
- Promoting and increasing renewable energy generation capacity in the Borough as well as a continued decrease in energy consumption
- Ensuring communities can access key services, facilities, green/open space, and employment opportunities by sustainable modes of transport
- Reducing the demand for the private vehicle
- Reducing the impacts of development on the road network and on road capacity
- Maintaining and improving walking and cycle routes through the Borough
- Delivering a mix of housing, and delivering affordable housing, to avoid the exacerbation of existing inequalities in the Borough
- Reducing existing inequalities
- Supporting the retention of existing businesses, and promoting inward investment
- Creating new job opportunities and reducing the rate of economic inactivity
- Maintaining and enhancing high educational attainment levels found in the Borough

How has the Cheltenham Plan been assessed?

14. An IA Framework was compiled (based on that used for the GCT Joint Core Strategy to progress a consistency of approach), including IA Objectives with decision-aiding questions that aim to resolve the issues and problems identified for development planning in the Cheltenham Borough area. This IA Framework, together with the baseline information and Plans and Programmes Review comprises the basis for assessment.
15. Each developing element of the Cheltenham Plan, including potential site allocations and policies to manage proposed development, has been tested through IA. The likely effects of the emerging Cheltenham Plan were assessed using the IA Framework, the baseline information, and professional judgment. The IA considered positive, negative and cumulative effects according to categories of significance as set out in the following table:

| Categories of Significance for SA | | |
|-----------------------------------|----------------|---|
| Symbol | Meaning | Sustainability Effect |
| - - | Major Negative | Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive |
| - | Minor negative | Potential sustainability issues: mitigation and/or negotiation possible |
| + | Minor positive | No sustainability constraints and development acceptable |
| ++ | Major Positive | Development encouraged as would resolve existing sustainability problem |
| ? | Uncertain | Uncertain or Unknown Effects |
| 0 | Neutral | Neutral effect |

16. Integrated (Sustainability) Appraisal is informed by the best available information and data. However, data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

What reasonable alternatives have been considered and assessed?

17. The Cheltenham Plan is limited with regard to reasonable alternatives – at the strategic level these options have been tested through SA and the development of the JCS that sets out the strategic policies for Cheltenham. At the local level, Issues & Options were considered and the responses received through public consultation informed the preparation of the Preferred Options (October 2016). Potential site allocation options were investigated, tested through SA and reported in the IA Report (October 2016) that accompanied the Preferred Options Plan on consultation. Thus, relevant alternatives have been considered and tested through the IA process in an iterative and ongoing way such that the findings of the IA have informed the plan-making.
18. The proposed development management and allocation policies were tested using the IA Objectives grouped within sustainability themes to better consider inter-relationships between topics and to address implementation of the plan as a whole. These themes are the same as investigated for the SA/IA of the JCS, and are as follows:

- Housing, Health & Sustainable Communities

- The Economy, City Centre, Education & Skills, Culture & Tourism
- Sustainable Transport
- Flooding, Water Resources & Water Quality
- Air Quality & Climate Change
- Historic Environment & Cultural Heritage
- Biodiversity
- Landscape/Townscape
- Land & Soils; Green Space

What are the likely significant effects of the Cheltenham Plan?

19. Overall, the implementation of the policies presented in the Cheltenham Plan were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from technical studies, the wider evidence base, and comments received from public consultations on draft proposals. The key positive effects are as follows:
- Major long term and cumulative positive effects through meeting the housing and employment needs of the Cheltenham Borough area - will also support economic objectives; good quality housing will have major direct cumulative positive effects on health
 - Ensuring that supporting green infrastructure will be provided in new development with both short and long term positive effects
 - Support for the economy and employment – will also have further positive effects for health and wellbeing; the vitality of the city and town centres
20. Alongside the positive effects, some minor negative effects were also identified, largely as a result of the overall, cumulative effect of increased housing, employment and associated infrastructure development in the plan area. The key potential negative effects are summarised as follows:
- Noise, air quality reduction, pollution, and congestion, arising from the overall predicted growth in road based traffic
 - Effects on landscape and indirect effects for biodiversity, where local level habitats and ecological linkages are disturbed or removed – cumulative in the longer term

How could negative effects be mitigated?

21. A key function of the IA process is to inform the development of the plan, helping to mitigate identified negative effects and enhance positive effects. At each stage, any recommendations made from the SA are taken forward into the next stage of the plan making process.

22. Mitigation for potential negative effects is provided by policies within the higher-level Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. A strong feature of the JCS is the protection of biodiversity at all levels in Policy SD10 with the commitment to Green Infrastructure in Policy INF4, recognising the many benefits it can provide, including managing flood risk, enhancing biodiversity, and providing recreational spaces for people. Potential negative effects on local biodiversity in the Cheltenham Plan will be mitigated through the requirement to conserve and improve biodiversity in new development, wherever possible.
23. Mitigation for potential negative effects is also provided by the development management policies including those for Green Infrastructure GI1-3, Historic Environment HE1-5, and Landscape L1 that recognise the special local characteristics of Cheltenham.

EqlA & HRA

24. The screening assessment has found that the Cheltenham Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required.
25. The Habitats Regulations Assessment (HRA) was updated to take into account comments from Natural England and the refinements/updating to the draft Plan resulting from the consultation in February- March 2017, and the adoption in November 2017 of the GCT JCS. The HRA screening continues to conclude that the Cheltenham Plan will not have adverse effects, alone or in combination, on the integrity of the identified European sites.

Consultation

26. The draft Cheltenham Plan Part One and its accompanying IA documents (October 2016) were subject to consultation during February – March 2017. Comments made on the IA documents were reviewed and responses prepared. The draft Plan has been refined and updated to take account of comments made and the updated Plan subject to IA. The Cheltenham Plan Regulation 19 and accompanying IA Report reflect the findings of various technical studies and responses received so far during consultation.
27. The Cheltenham Plan Regulation 19 and this accompanying Integrated (Sustainability) Appraisal Report will be available for consultation between January and March 2018. Comments made will be taken into account to prepare the Submission Plan that will be submitted to the Secretary of State for independent examination in due course in 2018.

Monitoring Proposals

28. The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication.
29. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Cheltenham Borough Monitoring Report (produced annually) alongside the monitoring framework provided in the GCT JCS is considered sufficient to ensure appropriate monitoring takes place going forward.

1.0 INTRODUCTION

Sustainability (Integrated) Appraisal

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation¹ and paragraph 165 of the National Planning Policy Framework (NPPF). Local Plans must also be subject to Strategic Environmental Assessment^{2, 3} (SEA) and Government advises^{4,5} that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
- 1.2 In addition, the Council has chosen to integrate the Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes with the overarching SA/SEA process. HIA is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty⁶ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. The SA, SEA, HIA and EqIA therefore all form part of the Integrated Appraisal (IA) process for the Cheltenham Plan. This Integrated (Sustainability) Appraisal (IA) Report is part of the evidence base for the Cheltenham Plan and it accompanies the Plan on statutory and public consultation.
- 1.3 The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the Cheltenham Plan. The HRA process has its own legislative drivers and requirements; whilst the different processes can inform each other, it is important that the HRA remains distinguishable from the wider IA process. The HRA process has been undertaken in parallel to the IA, but the detailed method and findings have been reported separately.

The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy

- 1.4 The currently adopted Cheltenham Borough Local Plan was prepared to cover the period 1991-2011 and is therefore being reviewed in consideration of the National Planning Policy Framework implemented in March 2012, the progress of the Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS), and changing local circumstances.
- 1.5 Cheltenham Borough Council is working in partnership with Gloucester City Council and Tewkesbury Borough Council to prepare a Joint Core Strategy

¹ Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

² EU Directive 2001/42/EC

³ Environmental Assessment of Plans and Programmes Regulations, 2004

⁴ DCLG - National Planning Practice Guidance' 2014, ODPM - 'A Practical Guide to the SEA Directive' 2005, Planning Advisory Service – 'The Principles of Plan Making Chapter 6 - The Role of Sustainability Appraisal' 2013

⁵ DCLG, 2012 National Planning Policy Framework

⁶ Equality Act, 2010

(JCS)⁷ that will guide development in the area up to 2031. The purpose of the JCS is to produce a co-ordinated strategic development plan to show how the area will develop over this period. The JCS is the spatial expression of the vision and strategic objectives for the overall GCT area. The JCS was submitted to the Secretary of State for examination on 20 November 2014. Three Hearing sessions were held between May 2015 and July 2016.

- 1.6 The Inspector's Interim Report (May 2016) set out the conclusions of the examination to date, including recommendations for main modifications to the JCS. Based on updated economic evidence, the Objectively Assessed Housing Need (OAHN) for the JCS area was increased to 35,175 dwellings. The Proposed Modifications were mostly concerned with meeting this uplift in housing need through strategic allocations. The changes were subject to consultation and discussed at the resumed examination in July 2017. The Inspector considered comments made in order to prepare her final report (October 2017)⁸ that concluded the JCS to be found sound subject to an immediate partial review.

The Cheltenham Plan

- 1.7 The Cheltenham Plan covers the administrative area of Cheltenham and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance. The Cheltenham Plan considers issues specific to Cheltenham Borough, such as the valued heritage assets and setting of the town, and includes lower level development management policies to be used in the determination of planning applications. It also identifies locations to accommodate non-strategic development as required by the JCS. The JCS and lower level Cheltenham Plan, along with the Gloucestershire Minerals and Waste Local Plans and any Neighbourhood Plans, will (when adopted) form the statutory Local Plan for the Borough.
- 1.8 The Cheltenham Plan has been developed in two parts - both seeking to provide local detail that supports the strategic elements of policy contained within the GCT JCS. The Plan (Part One Preferred Options October 2016) focused on three primary issues: site allocations within the Borough (outside of the strategic allocations in the JCS), a local economic strategy, and provision for local infrastructure (particularly local green space). Comments made during consultation were taken into account in the preparation of the draft Cheltenham Plan (November 2017) that also includes the second part of the plan with detailed development management policies (including some policies carried brought forward from the adopted plan).
- 1.9 Local communities, businesses and visitors have all helped to shape what the Cheltenham Plan should deliver (the Vision) and how it should be achieved (the Objectives). The Vision is organised under three themes A-C, as follows:

⁷ <https://jointcorestrategy.org/>

⁸ <https://jointcorestrategy.org/examination>

Vision Theme A: *Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities*

Objectives Theme A:

- a) Recognise the local distinctiveness of Cheltenham's various neighbourhoods and deliver regeneration where appropriate;
- b) Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough;
- c) Understand what people need from the places where they live and work to help create socially sustainable communities via local models;
- d) Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation;
- e) Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities;
- f) Increase opportunities for sport and active leisure, particularly in areas of under-provision;
- g) Ensure that places are designed in a way that is accessible to all and where barriers to walking and cycling are removed so that active travel and public transport are the default choices
- h) Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities; and
- i) Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime.
- j) Improve health outcomes by promoting and prioritising active travel.

Vision Theme B: *Cheltenham is a place with a prosperous and enterprising economy where education and employment opportunities are increasing and diversifying, where businesses choose to invest and where the benefits are felt by all.*

Objectives Theme B:

- a) Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham;
- b) Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact;
- c) Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres;
- d) Deliver a range of sustainable transport choices through appropriate infrastructure improvements including better cross-town and local links, prioritised junctions, and improved public transport.
- e) Encourage knowledge-intensive services businesses in high value sectors;
- f) Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities.

Vision Theme C: *Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally and tourists choose to visit and return to.*

Objectives Theme C:

- a) Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas;
- b) Conserve, manage and enhance Cheltenham's natural environment and biodiversity;
- c) Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the Borough maintains its reputation as a cultural destination and continues to be an attractive place to visit;
- d) Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term;
- e) Create a walkable network of interconnected, multifunctional green spaces that link with the wider countryside;
- f) Support provision, maintenance and continued investment in a high quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity; and
- g) Manage and reduce the risk of flooding within the Borough.

1.10 The Cheltenham Plan comprises chapters including the Policies and Site Allocations, as follows:

- Introduction
- Vision and Objectives
- Scale & Distribution of New Development JCS Policies SP1-2
- Employment – JCS SD2; Local Policies EM1-6
- Design Requirements -JCS Policy SD5; Local Policies D1-D3
- Green Belt – JCS Policy SD6; Local Policies GB1-2
- Landscape – JCS Policy SD7; Local Policy L1
- Cotswold Area of Outstanding Beauty – JCS Policy SD8
- Historic Environment – JCS Policy SD9; Local Policies HE1-5
- Biodiversity and Geodiversity – JCS Policy SD10
- Health and Environmental Quality – JCS Policy SD15; Local Policy SL1
- Housing Mix and Standards – JCS Policy SD12; Local Policies HM1-4
- Gypsies, Travellers and Travelling Showpeople – JCS Policy SD14; Local Policy GT1
- Green Infrastructure – JCS Policy INF4; Local Policies GI1-3
- Renewable Energy and Low Carbon Energy Development – JCS Policy INF6
- Retail and City/Town Centres – JCS Policy SD3

- Social and Community Infrastructure – JCS Policy SD5; Local Policies CI1-4
- Transport Network – JCS Policy INF1; Local Policies TN1-2
- Residential Development – JCS Policy SD11; Local Policies H1-2

Integrated Appraisal (IA): Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), and Habitat Regulations Assessment (HRA).

- 1.11 For the IA of the Cheltenham LP, an integrated process has been undertaken that includes the requirements for Sustainability Appraisal (SA) as set out in national planning guidance⁹ and to meet with the requirements of the EU SEA Directive as implemented in UK legislation through the SEA Regulations, 2004¹⁰. For development planning documents in England, sustainability appraisal should address socio-economic factors to the same level of detail as environmental factors and as required by the SEA Regulations.
- 1.12 This IA also addresses health and equality issues¹¹ alongside the requirements of the Habitats Directive¹² as implemented into UK legislation through the Habitats Regulations¹³. The findings of the health/equality and habitats assessments have been integrated into the Sustainability Appraisal. The Equality Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA) are provided separately as they are subject to different legislation and guidance. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the appraisal of the higher level plan - the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. The Council commissioned independent specialist consultants Enfusion to progress the appraisal work in May 2015.
- 1.13 Integrated (Sustainability) Appraisal is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA¹⁴. Initially the scope of the IA is determined by establishing the baseline conditions and context of the plan by considering other relevant plans and objectives, and by identifying issues, problems and opportunities for the area. From this the scope the IA is prepared and includes an IA Framework of objectives for sustainable development in the plan area and which forms the basis against which the plan is assessed.
- 1.14 An integrated approach to appraisal and assessment brings resource efficiencies and allows complementary issues to be considered concurrently.

⁹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

¹⁰ <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

¹¹ To demonstrate compliance with the Equality Act, 2010

¹² EU Directive 1992/43/EEC (and see also NPPF paragraphs 14 & 117)

¹³ The conservation of Habitats & Species Regulations, 2010

¹⁴ ODPM A Practical Guide to the SEA Directive 2005

The Government's extant guidance recognises value in undertaking Habitats Regulations Assessment (HRA) and SA concurrently (although the findings and reporting of the two processes should be kept distinct)¹⁵. In practice, the evidence base for both processes can be shared with Habitats Regulations Assessment findings and conclusions supporting the SA/Strategic Environmental Assessment.

Habitats Regulations Assessment (HRA)

- 1.15 The Conservation of Habitats and Species Regulations (amendment) (2011) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any European site designated for its nature conservation importance. The HRA screening (and any more detailed Appropriate Assessment) considers if the potential impacts arising as a result of the Cheltenham Plan are likely to have significant effects on these sites either alone or in combination with other plans and projects. The methods and findings of the HRA process is set out in a separate HRA Report that will be sent to the statutory consultee (Natural England) and placed on consultation for the wider public. The HRA findings have informed the IA.

Equality & Diversity Impact Assessment (EqIA)

- 1.16 In addition, the Council has chosen to integrate the health and equality impact assessment processes within the overarching Integrated Appraisal (IA) process; this is consistent with the approach taken by the higher-level plan – the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Health Impact Assessment is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall IA process. Public bodies have a duty¹⁶ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity.
- 1.17 For the appraisal of the Cheltenham Plan, the integration of health and equality concerns has focused on ensuring that these issues are well represented in the IA Framework [through objectives and decision-aiding questions] against which the emerging policies are assessed. Consideration of health and equality issues has been addressed iteratively as the appraisal process has progressed. Details of the Equality Impact Assessment (EqIA) are also presented separately to demonstrate compliance with the Equality Act (2010) as Appendix VIII to this IA Report.

Consultation: Statutory, Public & Stakeholder Engagement

- 1.18 Consultation has been an important part of the development of the Cheltenham Plan since early preparation. The Cheltenham Plan Scope was subject to consultation during June-September 2013; comments received

¹⁵ Planning for the Protection of European Sites: Appropriate Assessment: Guidance for Regional Spatial Strategies and Local Development Documents (DCLG, August 2006)

¹⁶ Equality Act, 2010

informed the next stage of plan-making - the Issues and Options and subject to a 6-week consultation in 2015. The Preferred Options Plan (Part One) was subject to consultation 6 February – 20 March 2017. Again, comments received at each stage of plan-making have informed the next stage. The Council has published Consultation Statements¹⁷ for the 2015 and 2017 consultations.

- 1.19 The Issues & Options version of the Plan was accompanied by the Draft IA Scoping Report (June 2015) for consultation, including the SEA statutory consultees (Historic England, Environment Agency and Natural England). The representations received were considered and reported in the Final IA Scoping Report (Appendix II). The Preferred Options draft of the Plan was also accompanied by the IA Report (October 2016) and the responses to the representations made are reported in Appendix V of this IA Report that accompanies the Draft Cheltenham Plan on Regulation 19 consultation.
- 1.20 The Integrated Appraisal studies and findings continue to inform the ongoing development of the Cheltenham Plan and comprise part of the evidence base for the emerging plan. The chronology of the plan preparation, consultation, and the accompanying IA stages is as follows:

Table 1.1: Cheltenham Plan with IA Stages and Documents

| Cheltenham LP Stage and Documents Consultation | IA Stage and Documents Consultation |
|---|---|
| Cheltenham Plan Scope Consultation (Regulation 18) July to September 2013 | N/A |
| Draft Vision and Objectives published February 2014 | N/A |
| Issues and Options Consultation June 2015 | IA Draft Scoping Report Consultation June 2015 |
| Preferred Options Regulation 18 Consultation November 2016 / January 2017 | Draft IA Report Consultation November / December 2016 |
| Pre-Submission Draft Plan Regulation 19 Consultation November-December 2017 | Draft IA Report Regulation 19 Consultation November-December 2017 |
| Submission Plan Submission to the Secretary of State Spring 2018 Examination TBC: Autumn 2018 | Final IA Report Submission to the Secretary of State Spring 2018 Examination TBC: Autumn 2018 |

Summary of Compliance with SEA Directive & Regulations

- 1.21 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process, as for this integrated appraisal of the Plan), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly

¹⁷ https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan/2

signposted. The requirements for reporting the SEA process are set out in Appendix 1 of this IA Report.

Structure of this Integrated (Sustainability) Report

- 1.22 Following this introduction, Section 2 of the IA Report sets out the methods used to appraise the emerging elements of the Cheltenham Plan. Section 3 describes the sustainability context for the IA, including the objectives of other relevant plans and programmes, and the baseline characteristics of the area (full details in Appendices III & IV). Section 4 explains how options are considered and assessed in plan-making and how alternatives are considered in IA in order to explicitly demonstrate compliance with the requirements of the SEA Regulations.
- 1.23 Section 5 summarises the overall findings of the IA of the Cheltenham Plan (Part One Preferred Options, February 2017). The detailed integrated appraisals of potential site allocations are provided in Appendix VII. Section 6 describes the changes made as a result of the Preferred Options consultation and updated evidence. The effects of the proposed policies and the implementation of the plan as a whole are described according to sustainability themes.
- 1.24 Appendix VIII details the findings of the EqIA and provides a separate document to demonstrate compliance for the Council with the requirements of the Equality Act, 2010. The Habitats Regulations Assessment Report accompanies the draft Cheltenham Plan; the findings are summarised and have been taken into account in this IA Report.
- 1.25 The SEA Directive and Regulations require that the Report should include a description of the measures envisaged concerning monitoring and such proposals are set out in Section 7. Summary conclusions are provided in Section 8, together with the next steps for the plan and the IA. In accordance with the SEA Directive, a Non-Technical Summary is also provided – at the beginning of this IA Report and also available separately. Appendix I provides signposting to explain how this SA complies with the requirements of the SEA Directive – and as required by the Directive.

2.0 SUSTAINABILITY APPRAISAL METHODS

Introduction

- 2.1 Integrated (Sustainability) Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of IA is to inform the Council as the planning authority; the IA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback from consultation. There is a tiering of appraisal/assessment processes (see also later Figure 4.1) that align with the hierarchy of plans – from international, national and through to local.
- 2.2 This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that “Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.” The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS) is a strategic planning document that provides strategic policy and allocations to guide promoters, communities and the three Councils in their decisions regarding proposed development. The Cheltenham Plan is a lower level planning document that is in conformity with the Joint Core Strategy and national planning requirements. IA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.3 This IA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive, the findings from the Habitat Regulations Assessment (HRA), and the findings of the Equality and Diversity Impact Assessment (EqIA). Since the Habitats Regulations Assessment (HRA) and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are provided separately to clearly demonstrate compliance.

Scoping and the IA Framework

- 2.4 During 2015 (and the early stages of the Draft Cheltenham Plan preparation), relevant plans and programmes (PP) were reviewed and baseline information was gathered and analysed by the independent specialist consultants, Enfusion, to help identify the issues, problems and opportunities for the area (further detailed in the following Section 3). The details of this analysis were reported in technical Appendices I & II to the Draft IA Scoping Report June 2015¹⁸.
- 2.5 A Framework of IA objectives, sub-objectives (decision-aiding questions) and thresholds of significance was developed from the key issues identified. This framework aims to promote and/or protect sustainability factors that are relevant to the Cheltenham Borough area and its timescale for

¹⁸ <http://consult.cheltenham.gov.uk/consult.ti/CheltplanIO2015>

implementation in the period up to 2031. It forms the basis against which emerging elements of the Cheltenham Plan are appraised using both quantitative and qualitative assessment, the evidence base, and professional judgment.

- 2.6 The IA Scoping Report set out the process undertaken and it was published on the Cheltenham Borough Council website in June 2015 and subject to public consultation including the SEA statutory consultees (Historic England, the Environment Agency, and Natural England). As a result of the comments received, minor amendments and additions were made to the baseline and PP review; along with a minor amendment to the identified key issues. The consultation comments are provided here in this IA Report at Appendix V, together with a summary of how they were taken into account. The final IA Scoping Report is provided separately in Appendix II as part of this IA Report.
- 2.7 The final IA Framework of Objectives, Decision-Aiding Questions, and certain thresholds of significance is set out in the following Table 2.1 (including cross-references for the key requirements in the NPPF and relevant GCT JCS SA Objectives):

Table 2.1 IA Framework

| IA Objective | | Decision making criteria: Will the option / proposal... | Assumptions or uncertainties | Significance criteria: standards and thresholds for IA | |
|--------------|---|---|--|--|--|
| 1 | Housing Ensure everyone has access to a high quality home that they can afford and that meets their needs. Relevant NPPF Paragraphs: 47-68 Relevant GCT JCS SA Objectives: 15 | <ul style="list-style-type: none"> Identify an appropriate land supply for housing? Ensure everyone has access to high quality and flexible housing? Provide enough affordable housing to meet local needs? Support the existing housing stock? Support minority groups with appropriate provisions, including Gypsies and Travellers? Deliver zero carbon homes? | <p>It is assumed that development at any of the site options has the potential to meet the design standards of the NPPF, Building Regulations and the Government's zero carbon buildings policy.</p> <p>It is assumed that development at any of the site options has the potential to meet the affordable housing requirements set out in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.</p> <p>The nature and significance of the effects on this IA Objective will primarily relate to the capacity of the site to accommodate housing development, and the timescale for delivery, those sites that can be delivered in the immediate term are considered to have a significant positive effect as it addresses the backlog in housing delivery.</p> <p>The Cheltenham Borough</p> | ++ | Site option has the potential to accommodate housing in the immediate term and address housing backlog. Potential for major long term positive effect. |
| | | | | | |
| | | | | + | Site option has the potential to accommodate housing in the longer term of the plan period. Potential for minor long term positive effect. |
| | | | | | |
| | | | | 0 | If no housing is being proposed as part of development, as it is an employment site, then it is considered to have a neutral effect against this IA Objective. |
| | | | | | |
| | | | | ? | Capacity of the site to accommodate residential development is unknown. |
| | | | | | |
| | | | | - | Not applicable. |
| | | | | | |
| | | | | -- | Not applicable. |
| | | | | | |

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| | | | Council Sites Assessment will be used to inform the IA in regards to site capacity and delivery term. | | | |
| 2 | Economy, Employment and Tourism Ensure the availability of employment land and premises to encourage inward investment and support the growth of existing businesses and the vitality of the town and its suburbs. Relevant NPPF Paragraphs: 18-22 Relevant GCT JCS SA Objectives: 10, 11, 17 | <ul style="list-style-type: none">Support the vitality and viability of the town and its suburbs?Enhance the quality of the public realm?Support the retention and enhancement of existing businesses?Deliver new employment land?Provide opportunities to connect with existing housing, facilities and amenities?Provide opportunities to connect with sustainable transport modes?Encourage inward investment?Promote tourism and cultural distinctiveness? | 2 a) This IA Objective will address two separate issues relating to employment. The first is the capacity of the site to accommodate employment land as well as the potential loss of existing employment , and the second is access to existing employment areas. | ++ | Potential for the site option to accommodate a significant level of employment development (greater than 1 ha). | |
| | | | | | | |
| | | | | + | Potential for the site option to accommodate employment development (less than 1ha). | |
| | | | | | | |
| | | | | 0 | If no employment land is being proposed as part of development, as it is a housing site, then it is considered to have a neutral effect against this IA Objective. | |
| | | | | | | |
| | | | | ? | Capacity of the site to accommodate employment development is unknown. | |
| | | | | | | |
| | | | | - | Development at the site may restrict other employment development and/ or has poor access to existing employment opportunities. | |
| | | | | | | |
| | | | | | -- | Development at the site may prevent other employment development and/ or lead to the loss of existing employment. |
| | | | | | | |
| | | | 2 b) This IA Objective will | ++ | Site is within 400m of a strategic | |

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| | | | <p>address two separate issues relating to employment. The first is the capacity of the site to accommodate employment land, and the potential loss of existing employment, and the second is access to existing employment areas.</p> <p>Access to existing transport modes has been addressed against IA Objective 5.</p> <p>Access is measured using GIS map layers provided by Cheltenham Borough Council.</p> <p>The nature and significance of the effects against this IA Objective will primarily relate to the distance of the site from existing employment areas.</p> | <div></div> <div></div> <div>+</div> <div></div> <div>0</div> <div></div> <div>?</div> <div></div> <div>-</div> <div></div> <div>--</div> <div></div> | <p>employment area. Development has the potential to reduce reliance on the private vehicle.</p> <p>Site is within 800m of an employment area and is likely to reduce reliance on the private vehicle.</p> <p>A neutral effect is not considered possible</p> <p>An element of uncertainty exists.</p> <p>The site is within 800m of an employment area, but development is less likely to reduce reliance on the private vehicle (i.e. steep topography or lack of suitable footpath).</p> <p>The site option is beyond 800m to an existing employment area. Development is likely to continue reliance on the private vehicle.</p> |
| 3 | Healthy Communities Support communities with inclusive design, | <ul style="list-style-type: none"> Reduce opportunities for crime? Make people feel safer through good design? | <p>It is assumed that development at any of the site options has the potential for design that minimises opportunities for crime, and</p> | <div>++</div> <div></div> | <p>It is considered unlikely that development at any of the site options will have major positive effects on health.</p> |

| | | | | |
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| <p>promote healthy lifestyles and reduce inequalities in wellbeing and opportunity.</p> <p>Relevant NPPF Paragraphs: 69-78</p> <p>Relevant GCT JCS SA Objectives: 12, 13, 14, 16, 17</p> | <ul style="list-style-type: none"> ■ Enable everyone to participate in local decision making? ■ Encourage healthy and active lifestyles? ■ Be surrounded by compatible land uses? ■ Ensure that existing open spaces, gardens, allotments are protected and enhanced? ■ Help to reduce inequalities in wellbeing and opportunity? | <p>that makes people safer.</p> <p>It is assumed that development at any of the site options has the potential for short-term minor negative effects arising during construction phases, and that suitable mitigation exists to ensure that these do not result in long-term negative effects on health and wellbeing.</p> <p>It is assumed that development at any of the site options has the potential for indirect long-term positive effects on health through the provision of housing or employment by helping to meet the needs of the Borough.</p> <p>It is assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services, or contributions towards them.</p> <p>It is therefore considered that the nature and significance of</p> | <p>+</p> <p>0</p> <p>?</p> <p>-</p> <p>--</p> | <p>The site option is within a reasonable walking distance of green / open space, and surrounded by compatible land uses</p> |
| | | | | <p>The site is not likely to be affected by neighbouring land uses or major infrastructure. Potential for a residual neutral effect.</p> |
| | | | | <p>An element of uncertainty exists until more detailed site level assessments have been undertaken.</p> |
| | | | | <p>The site is affected by neighbouring land uses or major infrastructure and / or is not within a reasonable walking distance of green / open space.</p> |
| | | | | <p>The site is affected by neighbouring land uses or major infrastructure and is located over 300m from green / open space.</p> |
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| | | | <p>the effects against this IA Objective will primarily relate to neighbouring land uses and access to green / open space, or the loss of green / open space as a result of development at the site.</p> <p>Is the site located within a Cordon Sanitaire area?</p> <p>The Cheltenham Borough Council Sites Assessment will be used to inform the IA in regards to neighbouring land uses.</p> | | |
| 4 | <p>Access to Services and Facilities Improve provision and accessibility to services and facilities, including health and educational facilities.</p> <p>Relevant NPPF Paragraphs: 29-46</p> <p>Relevant GCT JCS SA Objectives: 12, 14</p> | <ul style="list-style-type: none"> Support housing growth with good access to existing services and facilities? Provide adequate means of access to health care and educational facilities? Increase provision of local services and facilities? | <p>It is assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure, and other community facilities and services.</p> <p>Access is measured using Maiden services provided by Gloucestershire County Council.</p> <p>The nature and significance of</p> | ++ | Site is within 400m of all services and facilities (including health and educational). Development has the potential to reduce reliance on the private vehicle. |
| | | | | + | Site is within 800m of most services and is likely to reduce reliance on the private vehicle. |
| | | | | 0 | A neutral effect is not considered possible |
| | | | | ? | An element of uncertainty exists. |
| | | | | | |
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| | | | effects against this IA Objective will primarily relate to the accessibility of a range of services and facilities including; supermarket, post office, library, primary school, secondary school, children's centre, GP, Pharmacy, A&E / MIU and fitness facilities. | - | The site is within 800m of most facilities and services, development is less likely to reduce reliance on the private vehicle (i.e. steep topography or lack of suitable footpath). |
| | | | | -- | The site option is beyond 800m to all existing facilities and services. Development is likely to continue reliance on the private vehicle. |
| 5 | Access to Sustainable Transport Modes Maximise the use of sustainable modes of transport and reduce the need to travel by car Relevant NPPF Paragraphs: 29-46 Relevant GCT JCS SA Objectives: 8 | <ul style="list-style-type: none"> Maximise opportunities for cycling and walking? Provide adequate means of access to public transport modes? Reduce the frequency and duration of journeys by private car? | 5 a) This IA Objective will address two separate issues relating to access to sustainable transport modes. The first being access to public transport modes and the second being access to strategic footpaths and cycle routes. It is assumed that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport. It is also assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green | ++ | Site has good access to all sustainable transport modes; within 400m of bus connections, and 800m of a train station. Development has the potential to reduce the need to travel by car. There are no potential barriers to movement. |
| | | | | + | The site has access to either bus (within 400m) or a train station (within 800m). Development is likely to reduce the need to travel. There are no potential barriers to movement. |
| | | | | 0 | A neutral effect is not considered possible. |
| | | | | ? | There is an element of uncertainty for all site options. |
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| | | | <p>infrastructure and other community facilities and services.</p> <p>Access is measured using Maiden services provided by Gloucestershire County Council.</p> <p>The nature and significance of the effects against this IA Objective will primarily relate to access to existing modes of public transport.</p> <p>Where necessary the appraisal will note the realities of the situation with regard to existing access, for example if there are barriers to movement.</p> | - | The site has access to either bus (within 400m) or a train station (within 800m). Development is less likely to reduce the need to travel. There may be barriers to movement. |
| | | | | | |
| | | | | -- | Site option is not within a reasonable walking distance (over 800m) of a bus connection or a train station. Development is likely to increase the need to travel by car. There may be significant barriers to movement. |
| | | | | | |
| | | | <p>5 b) This IA Objective will address two separate issues relating to access to sustainable transport modes. The first being access to public transport modes and the second being access to strategic footpaths and cycle routes.</p> <p>It is assumed that development at any of the site options could potentially provide or contribute to</p> | ++ | Site has good access (within 400m) to strategic footpath and cycle routes. Development has the potential to reduce the need to travel by car. There are no potential barriers to movement. |
| | | | | | |
| | | | | + | The site has good access (within 400m) to either strategic footpaths or strategic cycle routes. Development has the potential to reduce the need to travel by car. There are no potential barriers to movement. |
| | | | | 0 | A neutral effect is not considered |

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|--|--|--|---|----|---|
| | | | improved sustainable modes of transport. | | possible. |
| | | | It is also assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services. | ? | There is an element of uncertainty for all site options. |
| | | | | | |
| | | | | - | The site has access (within 400m) to either strategic footpaths or strategic cycle routes. Development is less likely to reduce the need to travel. There may be barriers to movement. |
| | | | Access is measured using Maiden services provided by Gloucestershire County Council. | | |
| | | | | -- | The site is not within reasonable distance (400m) of strategic footpaths or cycle routes. Development is likely to increase the need to travel by car. There may be significant barriers to movement. |
| | | | The nature and significance of the effects against this IA Objective will primarily relate to access to existing strategic pedestrian and cycle routes. | | |
| | | | Where necessary the appraisal will note the realities of the situation with regard to existing access, for example if there are barriers to movement. | | |
| | | | The appraisal commentary will make a judgement on the overall accessibility (to public transport, services and facilities and employment) of | | |

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| | | | the site options with regard to IA Objectives 4 and 5 and whether a particular site option is more likely to reduce the need to travel? | | |
| 6 | Traffic To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth. Relevant NPPF Paragraphs: 29-41 Relevant GCT JCS SA Objectives: 8 | <ul style="list-style-type: none"> Provide safe and clear access to the road network? Overload the surrounding work network? Increase traffic in the area? Exacerbate any congestion issues? | The nature and significance of the effects against this IA Objective will primarily relate to traffic impacts / road capacity and site access. Cheltenham Borough Council's traffic modelling report will inform the IA. | ++ | Development has the potential to significantly reduce levels of traffic in an area that is experiencing congestion issues. |
| | | | | + | Development has the potential to reduce levels of traffic. Potential for a minor positive effect. |
| | | | | 0 | There is satisfactory access to the road network and the site is well located in respect of the road network and vehicle movements. Whilst development at the site has the potential to increase traffic, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect. |
| | | | | ? | An element of uncertainty exists until more detailed lower level surveys and assessments have been carried out. |
| | | | | - | Development has the potential to increase traffic in the surrounding road network and there is no satisfactory access to the site from the road network or the site is not well located in respect of the road network and vehicle movements. Mitigation available, potential for a residual minor negative effect. |
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| | | | | -- | Development is likely to increase the levels of traffic in an area that is already experiencing congestion issues, there is no satisfactory access to the site from the road network, and the site is not well located in respect of the road network and vehicle movements. Mitigation difficult and/or expensive. |
| 7 | Air Quality and Climate Change To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases. Relevant NPPF Paragraphs: 93-125 Relevant GCT JCS SA Objectives: 2, 3, 5, 6, 9 | <ul style="list-style-type: none"> Reduce Cheltenham Borough's carbon footprint? Ensure that sustainable construction principles and standards are integrated into all development schemes, aiming for the highest possible standards? 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? | <p>It is assumed that development at any of the site options has the potential to meet the design standards of the NPPF, Building Regulations and the Government's zero carbon buildings policy.</p> <p>It is assumed that any proposal for development can ensure high standards of energy efficiency in construction and occupation.</p> <p>Flood risk has been assessed against IA Objective 9.</p> <p>It is assumed that any proposal for development can incorporate climate change adaptation measures.</p> <p>The nature and significance of the effects against this IA</p> | ++ | Development has the potential to significantly reduce emissions within an area that experiences congestion issues. |
| | | | | + | Development has the potential to reduce levels of emissions. Potential for a minor positive effect. |
| | | | | 0 | Whilst development at the site has the potential to increase emissions, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect. |
| | | | | ? | An element of uncertainty exists until more detailed lower level surveys and assessments have been carried out. |
| | | | | - | Development has the potential to increase emissions. Mitigation available, potential for a residual minor negative effect. |
| | | | | -- | Development is likely to increase the levels of emissions in an area that already experiences |
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| | | | <p>Objective will primarily relate to emissions.</p> <p>A significant source of emissions comes from traffic, therefore the appraisal commentary will make a judgement on the overall effect of development on air quality and climate change considering IA Objectives 6 and 7.</p> | | congestion issues. Mitigation difficult and/or expensive. |
| 8 | Water Resources and Quality To reduce the demand for water, and maintain and improve the quality of water Relevant NPPF Paragraphs: 94,99, 109-125 Relevant GCT JCS SA Objectives: 5, 6 | <ul style="list-style-type: none"> Reduce the demand for water? Enhance opportunities for water recycling? Improve the quality of water? | The nature and significance of effects on water quality is dependent on whether the site option lies within a Surface Water Safeguard Zone, Ground Water Safeguard Zone, or Water Protection Zone. | ++ | Development has the potential to significantly enhance water quality. |
| | | | | + | Development has the potential to enhance water quality. |
| | | | | 0 | The site is not within any Surface Water Safeguard Zones, Ground Water Safeguard Zones, or Water Protection Zones. |
| | | | | ? | There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out. |
| | | | | - | Site option lies partially within a Surface Water Safeguard Zone, Ground Water Safeguard Zone, or Water Protection Zone. |
| | | | | -- | It is considered unlikely that development at any of the site options will have a major negative |
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| | | | | | effect on water quality. |
| 9 | Flooding To manage and reduce flood risk. Relevant NPPF Paragraphs: 93-108 Relevant GCT JCS SA Objectives: 4 | <ul style="list-style-type: none"> Ensure that the risk of flooding in the immediate vicinity and in the wider catchment is not increased as a result of development? Ensure that surface water run-off is slowed and absorbed? Ensure that surface water run-off does not increase flood risk in the immediate vicinity or the wider catchment? Include the use of Sustainable Drainage Systems? Maximise water collection opportunities? | <p>It is considered that the nature and significance of the effects against this IA Objective will primarily relate to flood risk.</p> <p>There is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.</p> | ++ | The site option is not located within an area of flood risk and there is evidence that development could offer an opportunity to potentially reduce flood risk. |
| | | | | + | The site option is not located within an area of flood risk. |
| | | | | 0 | The site is partially within an area of high flood risk but development can avoid this area / suitable mitigation is available resulting in a residual neutral effect. |
| | | | | ? | There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out. |
| | | | | - | The site is partially within an area of high flood risk, or at risk of surface water flooding in parts of the site. The areas of flood risk would be difficult to avoid and mitigation is likely to be expensive / difficult. |
| | | | | -- | The site is located wholly within an area of high flood risk or at risk of surface water flooding across the entire site. |
| | | | | | |
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| 10 | Biodiversity To safeguard and enhance biodiversity and improve connectivity between green | <ul style="list-style-type: none"> Protect and enhance European designated sites outside of the Borough boundaries? Protect and enhance SSSIs? Protect and enhance sites | <p>The nature and significance of effects against this IA Objective will primarily relate to potential effects on designated biodiversity.</p> <p>Is the site within, adjacent to,</p> | ++ | Development will; deliver biodiversity gains, or improve green corridors / connections to strategic GI, or development will address a significant existing sustainability issue relating to biodiversity or geodiversity. |
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| <p>spaces and functional habitats.</p> <p>Relevant NPPF Paragraphs: 109-125</p> <p>Relevant GCT JCS SA Objectives: 1, 16</p> | <p>recognised for their local biodiversity and geodiversity values?</p> <ul style="list-style-type: none"> Lead to the loss of priority habitat(s)? Disturb European Protected Species, Priority Species or Habitats upon which they depend? Lead to the fragmentation of green corridors? Link up areas of fragmented habitat? Promote the creation of new habitats and sites of wildlife interest? | <p>or in close proximity (200m) to any nationally designated biodiversity or geodiversity (SSSIs)? It should be noted that there are no European Designated Sites within the Borough boundary.</p> <p>Is the site within, adjacent to, or in close proximity (200m) to any biodiversity or geodiversity sites designated as being of regional (RIGS) or local importance (Key Wildlife Sites, Local Nature Reserves)?</p> <p>Is there evidence of European Protected Species or Habitats on the site?</p> <p>It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on designated biodiversity that may be some distance away.</p> <p>Are there opportunities to</p> | + | Development will not lead to the loss of an important habitat, species, trees and hedgerows or lead to fragmentation of green corridors and there are potential opportunities to enhance biodiversity or geodiversity. |
| | | | 0 | Development at the site is not likely to have negative effects on any internationally / nationally or regionally/ locally designated biodiversity or geodiversity or contribute towards a severance of green and blue infrastructure or impede the migration of biodiversity. Potential for a residual neutral effect. |
| | | | | or Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation possible, potential for a residual neutral effect. Development at the site does not contribute to the severance of green or blue infrastructure or impede the migration of biodiversity. |
| | | | ? | Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out |
| | | | - | Development at the site has the potential for negative effects on sites designated as being of regional or local importance. |

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| | | | <p>enhance biodiversity? Possibly improve connectivity, green / blue infrastructure or enhance an important habitat?</p> <p>Are there any opportunities to enhance geodiversity?</p> | | <p>Mitigation difficult and / or expensive, potential for a minor residual negative effect.</p> <p>or</p> <p>Development at the site has the potential for negative effects on National (SSSI) designated sites and / or European protected species or habitats. Mitigation possible, potential for a minor residual negative effect.</p> |
| | | | | -- | <p>Development at the site has the potential for negative effects on International designated sites, or National (SSSI, NNR) designated sites and / or European protected species or habitats. Mitigation difficult and / or expensive, potential for a major residual negative effect.</p> |
| 11 | <p>Landscapes and Townscapes</p> <p>Protect and improve the quality of the townscape and the broader landscape setting.</p> <p>Relevant NPPF Paragraphs: 109-125</p> <p>Relevant GCT JCS SA Objectives: 5, 6, 16, 18</p> | <ul style="list-style-type: none"> Protect and enhance the quality, character and distinctiveness of the townscape? Protect and enhance local identities and distinctiveness? Encourage well-designed, high quality development that enhances the built and natural environment? Protect and enhance the Cotswolds AONB? Reduce the potential for | <p>11a) This IA Objective will address two separate issues relating to landscapes and settlement identity. The first being landscape sensitivity and the second being Green Belt land.</p> <p>The nature and significance of the effects will primarily be dependent on the landscape sensitivity of the site option.</p> <p>The Cheltenham Borough</p> | <p>++</p> <p>+</p> | <p>Development significantly enhances the landscape or removes a significant eyesore and/or would regenerate previously developed land and buildings (PDL) that is currently having a major negative effect on the landscape/ townscape.</p> <p>Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/ townscape.</p> |

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| | | coalescence of Cheltenham with adjoining settlements? | Council sites assessment, and the Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB will inform the IA in regards to landscape sensitivity and the presence of previously developed land. The appraisal commentary will note if the site forms an important contribution to the character of the settlement. If the landscape sensitivity is not known then it is assumed that development on a greenfield site has the potential for a minor negative effect as there would be development in a previously undeveloped area. If the landscape sensitivity is not known then it is assumed that development on a brownfield site has the potential for a minor positive effect as it would result in the regeneration of the site. It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out | 0 | A neutral effect is not considered possible. |
| | | | | | |
| | | | | ? | Element of uncertainty exists until more detailed lower level assessments have been carried out. |
| | | | | - | The site option has medium sensitivity in landscape terms, and / or is within the AONB setting. Mitigation available. Potential for a minor residual negative effect. |
| | | | | - | The site option has medium to high or high sensitivity in landscape terms and / or is within the AONB or its setting. Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect. |

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| | | | through planning applications. It is assumed that any Tree Preservation Orders within a site option will be retained. | | |
| | | | 11b) This IA Objective will address two separate issues relating to landscapes and settlement identity. The first being landscape sensitivity and the second being Green Belt land . The nature and significance of the effects will primarily be dependent on the location of the site option within or outside of designated Green Belt land . The Cheltenham Borough Council sites assessment, and GIS mapping information will inform the IA in regards to the location of the site option in relation to designated Green Belt land. | ++ | A major positive effect is not considered likely against this SA Objective. |
| | | | | + | The site is not located within designated Green Belt land. |
| | | | | 0 | A neutral effect is not considered possible |
| | | | | ? | There is an element of uncertainty |
| | | | | - | The site option is located partially within designated Green Belt land |
| | | | | -- | The site option is located wholly within designated Green Belt land |
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| 12 | Historic Environment To protect and enhance the area's distinctive historic environment, including known and potential archaeological sites, | <ul style="list-style-type: none"> Protect and where appropriate enhance nationally designated and locally important heritage assets and their settings (Conservation Areas, Listed Buildings, Registered Parks and Gardens, Scheduled | The nature and significance of the effects against this IA Objective will primarily relate to designated heritage assets and their setting. Any important non-designated heritage assets will be noted within the appraisal | ++ | Development is likely to have a substantial positive effect on the significance of the heritage asset / historic environment or address a significant existing sustainability issue relating to culture and heritage. |

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| <p>designated and non-designated heritage assets and their setting, in a manner appropriate to their significance.</p> <p>Relevant NPPF Paragraphs: 126-141</p> <p>Relevant GCT JCS SA Objectives: 7, 18</p> | <p>Monuments)?</p> <ul style="list-style-type: none"> ■ Protect significant archaeology? ■ Ensure appropriate archaeological assessment where there is the potential for archaeological finds? ■ Improve access to, understanding of, or enjoyment of the historic environment? | <p>commentary.</p> <p>Are there any designated heritage assets, or their setting, that could be effected within or adjacent to the site?</p> <p>Are there any opportunities to enhance culture or heritage assets, such as; securing appropriate new uses for unused Listed Buildings; the removal of an eyesore</p> | | |
| | | | + | Development has the potential for minor positive effects as it may secure appropriate new uses for unused Listed Buildings; enhance the setting of or access / signage to designated assets. |
| | | | 0 | Development will have no significant effect. This may be because there are no heritage assets within the influence of proposed development or that mitigation measures are considered sufficient to address potential negative effects with the potential for a residual neutral effect. |
| | | | ? | Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out. |
| | | | - | Development has the potential for a minor negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Battlefield and Registered Historic Parks and Gardens and/or their setting. Even once avoidance and mitigation measures have been considered there is still the potential for a |
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| | | | | | residual minor negative effect. |
| | | | | -- | Development has the potential for a major residual negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Battlefield and Registered Historic Parks and Gardens and/or their setting. Mitigation difficult and / or expensive. |
| 13 | Cultural Heritage To protect and enhance the area's distinctive qualities that form part of the attraction to and fondness for the area. Relevant NPPF Paragraphs: 126-141 Relevant GCT JCS SA Objectives: 7, 18 | <ul style="list-style-type: none"> Protect and enhance the retail attractions of the town? Protect and enhance opportunities for cultural events, including Cheltenham Races, Festivals, Arts, and Cultural events? Protect and enhance the character of the immediate and wider area? Provide opportunities for new attractions or events? | The nature and significance of the effects against this IA Objective will primarily relate to cultural heritage assets and their settings e.g. Cheltenham Racecourse. | ++ | There is evidence to suggest that development at the site option will have a significant positive effect on cultural heritage. |
| | | | | + | There is evidence to suggest that development at the site option will have a positive effect on cultural heritage. |
| | | | | 0 | Evidence suggests that development is unlikely to result in any significant effects, or there is mitigation available to reduce negative effects, with the potential for a residual neutral effect, |
| | | | | ? | There is an element of uncertainty, or evidence is unavailable at this stage. |
| | | | | - | There is evidence to suggest that development at the site option will have a minor negative effect on cultural heritage. |
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| | | | | -- | There is evidence to suggest that development at the site option will have a significant negative effect on cultural heritage. |
| 14 | Land and Soils Minimise the use of natural resources including soil and greenfield land, protect safeguarded mineral resources, and soil quality. Relevant NPPF Paragraphs: 28, 93-125, 142-149 Relevant GCT JCS SA Objectives: 5, 6, 9 | <ul style="list-style-type: none"> Result in the loss of greenfield land? Protect best and most versatile agricultural land? Encourage redevelopment of previously developed land? Safeguard and protect strategic or important mineral deposits for future use? Avoid the sterilisation of mineral resources? Improve / remediate contaminated land? Minimise the volume of waste created during construction? Minimise the volume of waste created during occupation? Maximise reuse, recycling and composting of waste? | <p>It is assumed that any development has the potential to ensure sustainable waste management.</p> <p>It is assumed that any development on a contaminated site will ensure appropriate remediation prior to development.</p> <p>It is considered that the nature and significance of the effects against this IA Objective will primarily relate to the loss of best and most versatile agricultural land, and the presence of allocated or safeguarded mineral deposits.</p> <p>If there is uncertainty with regard to the agricultural land classification for a site option then a precautionary approach will be taken, i.e. if the evidence indicates that a site option is Grade 3, but no distinction is made between 3a and 3b, it will be assumed that development at the site will lead to the loss of Grade 3a agricultural land.</p> | ++ | Development at the site option will not hinder future access to minerals or result in the loss of any agricultural land. Development will remediate contaminated land. |
| | | | | + | Development at the site option will not hinder future access to minerals or result in the loss of best and most versatile agricultural land. |
| | | | | 0 | A neutral effect is not considered possible. |
| | | | | ? | An element of uncertainty exists until more detailed lower level surveys and assessment have been carried out through planning applications. |
| | | | | - | Development at the site option would either result in; the loss of best and most versatile land or an area allocated/ safeguarded for minerals. |
| | | | | -- | Development at the site option would result in the loss of best and most versatile land and is within an area allocated/ safeguarded for minerals. |
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Appraising the Cheltenham Plan

- 2.8 The Vision for the Cheltenham Plan was appraised against the IA objectives for sustainable development. A compatibility analysis of the Plan Vision & Objectives with the IA objectives was undertaken and the findings reported here in summary in Section 5 with the detailed analysis provided in Appendix VI.
- 2.9 Each potential non-strategic site option was appraised against the full IA Framework of objectives, decision-aiding questions and thresholds of significance using professional judgment and the baseline evidence. Where possible and appropriate, specified qualitative and quantitative thresholds were used to define the five categories of significance of effects (major and minor negative; neutral; major and minor positive). The assessment of effects considered the nature of the likely sustainability effects, including positive/negative; short-medium term (5-10 years)/long term (10-20 years plus); permanent/temporary; direct/indirect; cumulative and synergistic, were described in accordance with Schedule 2 of the SEA Regulations.
- 2.10 An appraisal commentary was provided on how the potential options would progress SA objectives, and where appropriate, recommendations for enhancement of positive effects and mitigation of negative effects were provided. Detailed IA matrices for site allocation options are provided in Appendix VII of this IA Report and summary findings are set out in Sections 4 and 5. Where uncertainty or gaps in information were apparent, this was recorded.
- 2.11 The IA of the Cheltenham Plan, including policies, is structured under sustainability themes/topic headings, which have been linked to the Objectives in the IA Framework as well as the suggested topics in the SEA Directive. This provides a framework and structure to evaluate the likely significant effects of the Cheltenham Plan. The appraisal has considered each aspect of the emerging Plan (policies and site allocations) as well as the interrelationships between topics and cumulative/synergistic effects of the implementation of the Plan as a whole.
- 2.12 Integrated Appraisal is informed by the best available information and data. However data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

Consultation

- 2.13 The SEA Directive and Regulations require early and effective public consultation. The development of the Draft Cheltenham Plan has been subject to statutory and public consultation since early preparation in 2013 with the plan scoping. The SA Scoping Report was subject to statutory consultation with the environmental bodies (Environment Agency, Historic England, Natural England) and also available on the Council's website. The IA Report accompanied the Preferred Options Plan on consultation from 6 February to 20 March 2017.
- 2.14 This IA Report will accompany the Cheltenham Plan on Regulation 19 consultation, including the SEA statutory consultees, stakeholders, and the public. Any comments received on the IA, and responses made, will be taken into consideration and reported in the Final IA Report that will accompany the Submission Cheltenham Plan for submission to the Secretary of State for independent examination – likely to be some time in the spring of 2018.

3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

Introduction

- 3.1 The IA scoping process was undertaken and presented in the Draft Scoping Report (June 2015). Comments were received from five consultees and minor amendments and additions to information were made and reported in the finalised IA Scoping Report (attached as Appendix II). The detailed review of relevant plans and programmes and baseline information was included in the Draft Scoping Report (June 2015) as Appendices I and II, and further attached to this IA Report as Appendices III and IV.
- 3.2 This Section provides a summary of the review of relevant plans and programmes and baseline information as well as the key issues and opportunities for sustainable development and spatial planning that were identified as a result of such studies.

Review of Relevant Plans and Programmes (PPs)

- 3.3 In order to establish a clear scope for the IA of the Cheltenham Borough Local Plan Part 1 (Cheltenham LP) it is necessary (and a requirement of the SEA Directive) to review and develop an understanding of the wider range of “policies, plans, programmes and sustainability objectives”¹⁹ that are relevant to the Plan. This includes International, European, National, Regional and local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the Cheltenham LP could be influenced by - and help to fulfil them. A detailed analysis of the relevant PPs are provided in this IA Report in Appendix IV and the key relevant plans and programmes are summarised in the paragraphs following:
- 3.4 The National Planning Policy Framework (NPPF, 2012) is the overarching policy framework for the delivery of sustainable development across England, and is underpinned by a presumption in favour of sustainable development. The purpose of the planning system is to contribute to the achievement of sustainable development. The National Planning Policy Framework²⁰ (paragraph 7) states that: “There are three dimensions to sustainable development - economic, social and environmental - which give rise to the need for the planning system to perform a number of roles”.
- 3.5 The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS)²¹, 2017 sets the level of development that the Cheltenham Plan should plan for, identifying the need and location for housing, employment and supporting infrastructure, as well as a policy framework to guide the delivery of new development up to 2031. The JCS provides the high level strategic policies

¹⁹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

²⁰ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

²¹ <https://jointcorestrategy.org/home>

and allocations for the JCS area; the Cheltenham Plan supports this framework with more detailed, locally-specific planning policies and non-strategic allocations for development.

- 3.6 The Cotswolds AONB Management Plan 2013-18 sets the policy framework for the management of the Cotswolds AONB with a vision for the Cotswolds to be a landscape that; retains its visual unity and scenic diversity, is richer in nature, where historic heritage is conserved, is home to vibrant communities supported by a sustainable local economy, and which provides a high-quality experience for everyone. The potential cumulative effects of the Cheltenham LP on the AONB is an important consideration for the IA.
- 3.7 The JCS Green Infrastructure (GI) Strategy (2014²²) focuses on connectivity and water, with a vision where anyone in an urban area can walk out of their home or workplace and by going through a series of interconnected green spaces emerge into the strategic GI of the River Severn and its washlands or the Cotswolds AONB. The protection and enhancement of green and blue infrastructure is an important consideration for the IA.
- 3.8 The Minerals Local Plan for Gloucestershire²³ (2018-32 yet to be adopted) sets the framework for determining planning applications for minerals development. The Strategy identifies sites for minerals extraction, which should be considered when assessing potential housing or employment allocations which may be on or in close vicinity to the identified minerals sites.
- 3.9 The Gloucestershire Waste Core Strategy²⁴, 2012-2027 explains how the County Council and its partners will address the issue of planning for waste management in Gloucestershire in the period 2012-2027. The core strategic objectives include; waste reduction; re-use, recycling and composting; other recovery (including energy recovery); waste disposal; and minimising impacts.
- 3.10 The Gloucestershire Local Transport Plan²⁵, 2015-2031 overarching objectives are: to support sustainable economic growth; to enable community connectivity; to conserve the environment; and to improve community health and wellbeing.
- 3.11 The GFirst Local Enterprise Partnership, Strategic Economic Plan for Gloucestershire²⁶, 2014 seeks to grow the economy by 2022 to drive growth of 4.8% GVA per annum, averaged over the period of the plan. To achieve the growth potential, the Plan proposes a Growth Zone, a Growth Hub and a centre of excellence in renewable energy, engineering and nuclear skills.

²² <https://jointcorestrategy.org/green-infrastructure-study/>

²³ <http://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/minerals-local-plan-for-gloucestershire/emerging-minerals-local-plan-for-gloucestershire-2018-2032/>

²⁴ <http://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/gloucestershire-waste-core-strategy/>

²⁵ <http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/>

²⁶ <http://www.gfirstlep.com/about-us/our-vision/strategic-economic-plan/>

- 3.12 The Gloucestershire Health and Wellbeing Strategy²⁷, 2012-2032 aspiration of the Strategy is to continue to improve the quality of life for everyone in Gloucestershire within available resources, and the strategy spans 20 years with the plan to be implemented through three-year action plans that are refreshed annually, enabling the measurement of progress in the short, medium and longer term. The Strategy uses the life-course approach of; starting well, developing well, living and working well, and ageing well, and sets aspirations for each of these life stages. Health and well-being is linked to a number of different issues, such as access to open space and adjacent land uses, and is an important consideration for the IA.
- 3.13 Cheltenham Borough Council Strategic Flood Risk Assessment (SFRA Level 1, 2007 & Level 2²⁸, 2011). The assessment maps all forms of flood risk in the Borough. The assessment can also assist in determining which areas within the Borough require further flood risk assessment prior to any development.
- 3.14 Cheltenham Borough Council Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB, 2015. The assessment looks at reasonable site options that lie within or adjacent to the AONB, and provides information on the character, sensitivity and capacity of each site.
- 3.15 Cheltenham Borough Council Local Green Spaces Study Report, 2015. The study, through consultation with local communities, identifies 29 sites that could be considered for inclusion in the emerging Cheltenham LP as designated Local Green Spaces. Locally valued green spaces is an important consideration for the IA.
- 3.16 Cheltenham Borough Council Air Quality Action Plan²⁹, 2014. This sets out a number of actions that if implemented could have a positive impact on air quality within Cheltenham, and contribute to the reduction of emissions in areas that currently fail to meet the air quality objective for nitrogen dioxide. The effects of development on air quality will be an important consideration for both the Cheltenham LP and IA as the whole Borough is currently a designated Air Quality Management Area.
- 3.17 Cheltenham Economic Strategy: Developing Cheltenham as a Business Location, 2015. The strategy outlines key priorities and objectives for Cheltenham's economic strategy with delivery ideas and options. The Cheltenham Plan can ensure that development achieves high design standards to help attract further inward investment.

Baseline Conditions

- 3.18 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the plan area and to provide the basis for predicting and monitoring effects of the plan. In order to make judgments about how the

²⁷ http://www.gloucestershire.gov.uk/media/2941/joint_health_and_wellbeing_strategy-56736.pdf

²⁸ https://www.cheltenham.gov.uk/downloads/download/1037/strategic_flood_risk_assessment_level_2

²⁹ https://www.cheltenham.gov.uk/downloads/file/3780/air_quality_action_plan_2014

Cheltenham Plan will progress sustainable development, it is essential to understand the economic, environmental and social circumstances in the Borough today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the Borough to allow the potential effects of the Cheltenham Plan to be adequately predicted.

- 3.19 The SA/ SEA Guidance provided by Government³⁰ proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the IA process informs plan making and as new information becomes available. A summary of the collated baseline information is provided below with a description of the current situation. The detailed baseline information is presented in Appendix III of this IA Report – and this also details the likely evolution of the baseline without the Plan for each of the topics.

Water: Resources, Quality and Flooding

- 3.20 The Rivers Swilgate and Chelt within the Borough are of poor ecological quality and Hatherley Brook is of moderate ecological quality. The River Swilgate has good chemical quality, however the Hatherley Brook fails on its chemical quality status against the Environmental Quality Standards Directive 2008/105/EC. The River Chelt has not been assessed for its chemical quality. The baseline information has shown that the quality of these rivers and groundwater bodies in the Borough are unlikely to meet the requirements of the Water Framework Directive³¹ to be at *good status* by 2015; however, the Severn River Basin Management Plan³² predicts that 34% of surface waters will be at good or better ecological status or potential and 65% of groundwater bodies will be at good status by 2015. Key issues for water quality include; point source pollution from water industry sewage works; physical modification of water bodies; and diffuse pollution from urban sources.
- 3.21 Cheltenham is in the Severn Trent water supply area, within the Strategic Grid Water Resource Zone which requires significant investment over the next 25 years, as a result water efficiency in development becomes a vital factor in mitigating the expected loss in deployable output.
- 3.22 There are 9 main rivers in the Borough, of relevance is the River Chelt flowing through the centre of Cheltenham and regulated by a flood alleviation scheme. Flood risk is influenced by surface water and the overloading of the old drainage system. The Strategic Flood Risk Assessment indicates that a large proportion of any rain falling becomes runoff even when the soil is not saturated. The high degree of urbanisation coupled with the small size of catchments and impermeable underlying rock mean that the greatest flood

³⁰ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

³¹ Directive 2000/60/EC establishing a framework for the Community action in the field of water policy

³² <https://www.gov.uk/government/publications/severn-river-basin-district-river-basin-management-plan>

risk in the region is from high-intensity convective storms. Effective Sustainable Drainage Systems will be a vital factor in future development in the Borough, and the Cheltenham Plan has potential for positive effects by helping to address existing surface water flooding issues or by helping to reduce the risk of flooding.

Biodiversity: Fauna and Flora

- 3.23 There are no European designated biodiversity sites within the Borough. The Borough includes part of Leckhampton Hill and Charlton Kings Common SSSI, and is adjacent to a further four SSSIs. The area of the Leckhampton SSSI that falls within the Borough boundary contains areas that have been assessed as 'unfavourable recovering' and 'unfavourable declining'. The Cheltenham Plan can seek improvements to this biodiversity site to contribute to achieving a favourable status. The Borough also contains a designated Local Nature Reserve (Griffiths Avenue) and an urban nature reserve (Pilley Bridge), as well as eight Key Wildlife Sites. Cheltenham Borough Council is seeking to upgrade all their nature reserves to Local Nature Reserve designation status.

Cultural Heritage

- 3.24 The Borough contains highly valued heritage assets including; 7 Conservation Areas, 2 Registered Parks & Gardens, 6 Scheduled Monuments and over 2602 Listed Buildings. Of the Listed Buildings two are on the 'Heritage At Risk Register'; The Church of St Mark, Church Road and the Church of St Luke, College Road. The Cheltenham LP can seek development that contributes to improving their condition. There is also an Index of Buildings of Local Interest which serves to protect locally important buildings that do not meet the strict criteria for statutory listing but nevertheless make a special local contribution to the history, appearance, character and cultural value of Cheltenham. The index contains around 450 buildings and structures. Further to this there are 6 sites of archaeological remains within the Borough which are also designated as scheduled Monuments. The lower end of the High Street is also recognised as an archaeologically sensitive area. The Borough has strong cultural heritage values which were highlighted in the Cheltenham LP scoping responses³³ as highly valued by residents. Cultural aspects include; Cheltenham Racecourse, Sports Facilities, Events and various music, arts and science festivals.

Landscape and Visual Amenity

- 3.25 A significant part the Borough (22%) lies within the Cotswolds Area of Outstanding Natural Beauty (AONB). The AONB extends into southern and eastern edges of the town, as well as the parishes of Charlton Kings and the south east of Leckhampton. The AONB therefore is likely to come under pressure from housing development needs, and the sensitivity of this landscape area will be an important consideration for the Cheltenham LP. The Borough comprises of the Severn and Avon Vales National Character

³³ Cheltenham Borough Council (2013) Cheltenham Plan Scoping Documentation [online] http://www.cheltenham.gov.uk/downloads/file/3578/summary_report [accessed June 2015]

Area (NCA) and the Cotswolds NCA. The majority of the Severn and Avon Vales area is used for agriculture in a predominantly open landscape. The Cotswolds are characterised by patterns of steep scarp crowned by high, open wold, where expansive views across the Severn and Avon Vales exist. Settlements in the Cotswolds are also characterised by the use of local limestone in buildings and walls. Centrally the town is largely an urban townscape noted for its Regency architecture.

- 3.26 17% of the land within the Borough is also designated Green Belt land seeking to prevent the coalescence of Cheltenham with both Gloucester and Bishop's Cleeve.
- 3.27 A consultation process with local communities undertaken identified 29 sites within the Borough to be put forward for Local Green Space designation in the emerging Cheltenham Plan. The evidence indicates that Pittville Park is the most used green space within the Borough, and that the overall quality of all green spaces in the Borough is of a good standard. Green infrastructure improvements / opportunities have been identified in the GCT JCS for Hatherley Brook, Kingham Dismantled Railway Line, River Chelt, Wyman's Brook, the Honeybourne Line and strategic cycle ways / Sustrans routes.

Energy and Climate Change

- 3.28 There is a decreasing trend in carbon dioxide emissions since 2005 within the Borough, and the biggest contributor of emissions is the industrial and commercial sector, closely followed by domestic and then transport. In 2012, the Borough had a total renewable energy capacity of 4.11MW. Renewable energy capacity is lower in Gloucestershire than most other local authorities in the South West. There is much room for improvement in renewable energy provisions. Although energy consumption rates have decreased since 2005 they are still generally higher than averages across the South West and England for both electricity and gas.

Air Quality

- 3.29 The whole of Cheltenham Borough is a designated Air Quality Management Area (AQMA). Most nitrogen dioxide emissions are from road traffic exhaust emissions. There are five key areas within the Borough where nitrogen dioxide levels exceed air quality objectives:
- High Street – Bath Road; a reduction of 24% is required
 - Swindon Road – St Georges Street Junction; a reduction of 17% is required
 - Fairview Road – Winchcombe Street Junction; a reduction of 8% is required
 - London Road – Hales Road Junction; a reduction of 19% is required
 - High Street (Western End) – Junction with Gloucester Road; a reduction of 14% is required.

Infrastructure, Transport and Accessibility

- 3.30 The Borough has high rates of residents who travel to work by car, higher than national averages. There is also a higher than national average number of people who work from home, and number of people who cycle or walk to work. The M5 motorway is the busiest route in the County, carrying up to 90,000 vehicles a day, and there are further three main roads that pass through the Borough; the A40 London / South Wales route; the A46 / B4632 Coventry / Bath Road; and the A435 Evesham / Cirencester Road.
- 3.31 As Cheltenham is largely an urban area, daytime bus services within the Borough operate on a commercial basis (without the need for subsidy), and are largely more accessible than found in the surrounding rural areas. Cheltenham railway station is located within the Borough boundary and its' main routes include Gloucester, London, Birmingham and Bristol. There is also Gloucestershire Airport located in Tewkesbury Borough between Gloucester and Cheltenham. The civil airport is relatively small, but has customs facilities for flights to the continent. Constraints formed by surrounding development mean that Gloucestershire Airport is unlikely to significantly expand operations during the Transport Plan period. Therefore, the focus for commercial air travel to and from Gloucestershire will continue to be on the major airports located in the South East, West Midlands and at Bristol and Cardiff. The local cycle path network includes some traffic-free Sustrans routes connecting Cheltenham to Gloucester.
- 3.32 The Local Transport Plan³⁴ identifies through an Access Matrix that the majority of Cheltenham Borough has good accessibility rankings, however accessibility scoring decreases in the more rural areas in the south east of the Borough within the Cotswold AONB.

Land, Minerals and Waste

- 3.33 Some of the geology of the area impedes drainage or is slowly permeable which can contribute to flood risk. There is limited agricultural land within the Borough, as to be expected as it is predominantly an urban area. Small pockets of best and most versatile agricultural land exist in Leckhampton, Prestbury and adjacent to Kingsditch Industrial Estate. The area overlies Jurassic Limestone deposits, however there are no minerals allocations or safeguarded sites within the Cheltenham LP area.
- 3.34 In 2012, 87.2% of new housing development was located on previously developed land, there is only one site within the Borough that has been identified on the public register of contaminated land, and this site has since been remediated.
- 3.35 Waste is managed at the County level, and Municipal Solid Waste (MSW) and hazardous waste has been increasing since 2000. There are local recycling banks, generally located within car parks and supermarkets. There is a Materials Recovery Facility (MRF) at Moreton Valence (Gloucester), and

³⁴ Gloucestershire County Council (2011) Gloucestershire's Local Transport Plan 2011-26 [online]

planning permission for another MRF has been granted at Wingmoor Farm East (Tewkesbury). Wingmoor Farm also houses non-hazardous and hazardous waste landfill sites. There are currently 84 operational waste water treatment facilities in Gloucestershire, with major facilities at Netheridge (west of Gloucester) and Hayden (south west of Cheltenham)³⁵.

Housing

- 3.36 Recent trends indicate an increase in housing delivery, and a need for at least 10,917 new homes in the Borough in the period up to 2031. The average sale prices of housing over the last five years are; £247,856 for a terraced property; £280,455 for a semi-detached house; £495,251 for a detached house; and £193,226 for a flat, creating an overall average house price of £311,502. Affordable housing provision has fallen in the three years leading to 2010, which places pressure on existing housing to meet local needs. Over the period April 2006 to April 2011 the town delivered 2,100 new homes, with an average annual delivery of 430 dwellings. The current housing needs assessment estimates a requirement of 929 new affordable homes to be delivered every year. Housing need in Cheltenham is therefore more than twice as high as the actual supply of all new homes. The delivery of affordable housing in the Borough will be a crucial consideration for the Cheltenham Plan.
- 3.37 There is one authorised Gypsy and Traveller site within the Borough, which consists of one household, with two pitches. The 2007 GTAA identified the need for four pitches, however Cheltenham is largely seen as an unfavourable location for Gypsies and Traveller due to its urban nature; rural sites are favoured as they are better placed to meet Gypsy and Traveller needs (e.g. grazing for horses).

Healthy Communities and Equality

- 3.38 In 2011 Cheltenham had 115,732 usual residents, approximately 2.2% of the population of the South West, and there are slightly more females than there are males. The census data shows that the Borough had a population density of 24.8 people per hectare in 2011. The population has been steadily increasing from 110,013 residents in 2001. The majority of the resident population are white, with smaller ethnic groups of mixed races, Asian, Black and Arab communities³⁶.
- 3.39 The health of residents is generally better than the England average. Deprivation is lower than average, however about 15.2% (2,900) of children live in poverty. Life expectancy for both men and women is higher than the England average. In the most deprived areas of the Borough, life expectancy is reduced by 9.2 years for men and 7.3 years for women, reflecting the inequalities present.

³⁵ Gloucestershire County Council (2012) Gloucestershire Waste Core Strategy (WCS) [online]]

³⁶ ONS (2011) Datasets for Cheltenham Local Authority [online]

Economy, Employment and Education

- 3.40 In 2013-14 85.5% of the working population of Cheltenham Borough were economically active, a significant decrease from 89.2% in 2007, and as such the unemployment rate (economically active but unemployed) has risen from 3.2% in 2007 to 4.6% in 2013/14, though this remains lower than the national average of 6.8%. The largest employment sector for Cheltenham residents in 2014 is in professional and senior occupations (58.4%), followed by administrative and skilled trades (19%). The statistics show that the majority of businesses within the Borough are within the service industry, and average weekly earnings are higher in the Borough than found in the South West, but lower than the Great Britain average.
- 3.41 In 2014, 50.5% of residents obtained skill levels of NVQ4 or higher, which is higher than the national average of 36%. Less than 1% of residents were identified in 2014 as having no qualifications, which is significantly lower than the national average of 8.8%. There are 74 educational establishments within the Borough including special schools, community schools, voluntary controlled schools, and independent schools. The University of Gloucestershire is located across 3 sites, 2 of which are in Cheltenham and one in Gloucester.

Key Sustainability Issues, Problems and Opportunities

- 3.42 The key sustainability issues that were identified during the IA Scoping stage are summarised in Table 3.1 below.

Table 3.1: Key Sustainability Issues, Problems & Opportunities

| Key Sustainability Issues, Problems & Opportunities | |
|---|--|
| ■ | Maintaining and where appropriate, improving the quality of water bodies in the Borough (particularly the Rivers Chelt, Swilgate and Hatherley Brook) |
| ■ | Reducing the demand for water resources |
| ■ | Reducing the risk of flooding, particularly from surface water runoff, in new development and the impacts of flooding on existing development |
| ■ | Protecting and enhancing biodiversity where possible and required by legislation, and creating connections between existing and new GI and biodiversity sites |
| ■ | Maintaining and enhancing green/blue corridors to support the movement of people and biodiversity |
| ■ | Valuing local participation and responding to local views (e.g. designating locally valued green spaces identified through consultation, in the emerging Plan) |
| ■ | The sensitivity of historic environment |
| ■ | The promotion and enhancement of the cultural heritage of Cheltenham |
| ■ | Protecting and enhancing designated and non-designated heritage assets and their settings, including archaeology |
| ■ | Protecting and enhancing the landscape, in particular the Cotswolds AONB and its setting |
| ■ | Protecting limited agricultural land supplies in the Borough |
| ■ | Promoting development on previously developed land |

- Protecting the Green Belt to avoid the coalescence of Cheltenham with Gloucester and Bishop's Cleeve
- Improving air quality in the Borough
- Promoting and increasing renewable energy generation capacity in the Borough as well as a continued decrease in energy consumption
- Ensuring communities can access key services, facilities, green/open space, and employment opportunities by sustainable modes of transport
- Reducing the demand for the private vehicle
- Reducing the impacts of development on the road network and on road capacity
- Maintaining and improving walking and cycle routes through the Borough
- Delivering a mix of housing, and delivering affordable housing, to avoid the exacerbation of existing inequalities in the Borough
- Reducing existing inequalities
- Supporting the retention of existing businesses, and promoting inward investment
- Creating new job opportunities and reducing the rate of economic inactivity
- Maintaining and enhancing high educational attainment levels found in the Borough

The Likely Evolution of the Baseline Without the Plan

- 3.43 Without the Plan, there would be no coordinated approach to planning and managing new development with likely negative effects on environmental factors. The identified housing and employment needs may not be delivered – and not in the most sustainable locations. Opportunities for enhancing community services and green infrastructure are unlikely to be progressed in an effective manner.

Updating the Baseline

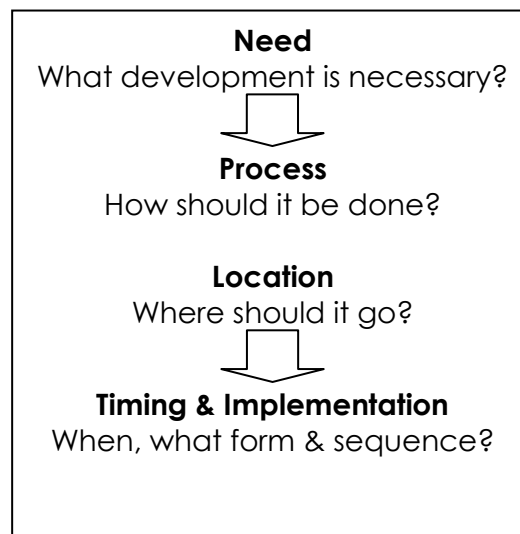
- 3.44 The IA shares the evidence base with the plan-making – and in accordance with Government advice. Any available updated information was considered in the updating of the IA, including the EqIA and the HRA.

4.0 CONSIDERATION OF PLAN-MAKING OPTIONS AND ALTERNATIVES IN IA

Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive³⁷ requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance³⁸ advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan.
- 4.2 Extant SEA guidance³⁹ sets out an approach and methods for developing and assessment of alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making



- 4.3 Case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment⁴⁰ confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of

³⁷ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

³⁸ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

³⁹ <http://www.pas.gov.uk/pas/core/page.do?pagelid=152450>

⁴⁰ Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

alternatives. The SA report accompanying the plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.

- 4.4 The Broadlands Judgment⁴¹ drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment⁴² confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report.

Assessment of Options in Plan-Making

- 4.5 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the Councils through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.6 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.
- 4.7 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services and impacts on local landscape, and particularly informed by technical studies such as the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), and Strategic Flood Risk Assessment (SFRA). There is a hierarchy of options assessment, with sites that are not viable or

⁴¹ Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

⁴² Cogent Land LLP v Rochford District Council (2012) EWHC 2542

deliverable or which might have adverse effects on protected environmental assets, rejected at an early stage.

- 4.8 The role of the IA is to inform a Council in their selection and assessment of options; IA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the IA can help with refining and further developing these options in an iterative and ongoing way. The IA findings do not form the sole basis for decision making – this is informed also from planning and other studies, feasibility, and consultation feedback.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy & the Cheltenham Plan

- 4.9 Different options for accommodating proposed growth in the Gloucester, Cheltenham and Tewkesbury local authority areas have been considered and variously subject to SA/SEA and consultation since early Joint Study Area studies in 2004-6, through iterations of the emerging Joint Core Strategy 2009-2013 and Submission in 2014, and continuing during the Examination stages 2015-2016 and to Main Modifications in 2017.
- 4.10 The approach that has been taken to options identification, refinement and appraisal is explained in the GCT JCS SA Report⁴³ (sections 4-8, 2014) that accompanied the JCS on submission (November 2014) to the Secretary of State for examination. This includes the SA findings and the reasons for selecting or rejecting alternatives in the wider JCS area and the Cheltenham Borough area. Consideration of options was discussed during the Examination of the JCS and this included reflection on the proposed Strategic Site Allocations (Policy SA1) to meet Cheltenham's identified need for new development. Details are provided in the Inspector's Interim Report⁴⁴ (May 2016) and the SA Addendum Report (September 2016) that accompanied the proposed Main Modifications to the JCS on consultation in October 2016.
- 4.11 Doing nothing is not a reasonable alternative for the Cheltenham Plan since a strategy with locally relevant Policies and local (non-strategic) site allocations is required to avoid negative effects and ensure a sustainable delivery of the required development in the Cheltenham area and as identified in the JCS (Policies SP1 & 2)⁴⁵.
- 4.12 There is limited possibility for investigating strategic options through the Cheltenham Plan. The Strategy and Development Principles are underpinned by a City Centre first approach that has developed over considerable time and study with the JCS, including testing through SA. Local development opportunity options were considered through public consultation in June 2015 with the Issues & Options stage of plan preparation and Sustainability Appraisal.

⁴³ <http://www.gct-jcs.org/SustainabilityAppraisal/>

⁴⁴ <http://www.gct-jcs.org/>

⁴⁵ Ibid

- 4.13 The plan-making and SA/SEA processes have identified and refined the reasonable options (suitable and deliverable) available for possible allocation as local sites in the Cheltenham Plan. These have been tested through the SA/SEA process and details are provided in this IA Report at Appendix VII. An outline of the reasons for selection or rejection of options is also reported in this IA Report in Section 5 (Table 5.1) and discussed in Section 6, and in accordance with requirements of the SEA Regulations.

5.0 INTEGRATED APPRAISAL OF THE CHELTENHAM BOROUGH LOCAL PLAN PART 1 PREFERRED OPTIONS (October 2016)

Vision and Objectives

- 5.1 The detailed Cheltenham Plan (Part One Preferred Options, 2016) Vision Themes are compatible with the IA Objectives. In particular, the Theme A Vision is highly compatible with IA Objectives relating to housing, settlement infrastructure and settlement connectivity, the Theme B Vision is highly compatible with IA Objectives relating to the economy and education, and the Theme C Vision is highly compatible with IA Objectives relating to environmental considerations. The Vision Themes are all also compatible with IA Objectives to reduce inequalities and support health and wellbeing. No significant incompatibilities were identified, and no IA recommendations were made the Vision Themes.
- 5.2 The Objectives of each Theme were found to be compatible with at least one of all of the IA Objectives, and as such will contribute to sustainable development to a certain extent. Theme A Objectives were found to be highly compatible with IA Objectives relating to the provision of housing, employment and infrastructure. Theme B Objectives were found to be highly compatible with IA Objectives relating to the economy, employment and education. Theme C Objectives were found to be highly compatible with IA Objectives relating to the protection and enhancement of the natural environment and the promotion of healthy lifestyles. Theme A, B and C Objectives were all found to be compatible with IA Objectives to reduce inequalities and support health and wellbeing. No significant incompatibilities were identified.
- 5.3 Some of the Objectives are very specific and therefore only relate to certain IA Objectives, as such these are likely to have a neutral effect on other IA Objectives. Given the complex inter-relationships between objectives, some uncertainties were found; for example, the delivery of new housing and employment land has the potential to affect water resources and quality, flood risk, townscape, biodiversity and historic heritage settings. Positive effects and compatibility would be dependent on further objectives that seek to minimise potential negative effects, for example, objectives that seek to reduce demand for water resources, or objectives that seek high quality design. To reduce these uncertainties, two recommendations were made as follows:
- Theme A Objective B could be expanded to include wording that seeks to minimise effects on the natural environment whilst meeting housing needs. For example, 'Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough, *whilst minimising the impacts of development on the natural environment*'.
 - Theme B Objective A could be expanded to include wording that seeks to minimise effects on the natural environment whilst

delivering new employment land. For example, ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham, *whilst minimising the impacts of development on the natural environment*¹.

Potential Site Allocations

- 5.4 The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (JCS) sets out the overarching strategy for development growth up until 2031. It has identified the objectively assessed need for the Cheltenham Borough area and the spatial strategy to accommodate this level of development. The JCS identifies a settlement hierarchy as the basis for delivering growth targets and Cheltenham Borough is identified within this as a Key Urban Area.
- 5.5 The Cheltenham Local Plan sets out in Policy PR1 housing site allocations and in Policy PR2 mixed-use development site allocations where new development will be provided to deliver the scale and distribution proposed in Policies SP1 and SP2 of the GCT Joint Core Strategy insofar as they relate to the need for development in Cheltenham Borough outside the strategic allocations proposed in the JCS. Policy SP2 of the JCS requires the Cheltenham Key Urban Area and its urban extensions to accommodate 10,917 new homes to 2031. Some of this development has already been completed and/or committed.
- 5.6 During preparation of the Cheltenham Local Plan, a number of site options were considered and appraised. Options were identified through the Strategic Housing Land Availability Assessment (SHLAA) and subject to Integrated Appraisal – the detailed findings of the IA are provided in this IA Report in Appendix VII.
- 5.7 Certain site options were progressed into the Cheltenham Borough Local Plan and others were not taken forward at this stage. The findings of the IA informed this selection but is not the sole source of information to inform decision-making as part of the plan preparation.

Table 5.1: Reasons for Selection or Non-Progression of Options for Site Allocations

| Preferred Housing site or mixed use allocation | Site Ref | CP I&O Ref (IA Ref) | Site Name | Reason for exclusion from Preferred Options |
|--|----------|---------------------|---|--|
| No | S002 | CP001 | Land at Hyde Lane, Hyde Lane | SALA found site to not be deliverable or developable |
| No | S003 | CP002 | Land at Hyde Farm (west section) | SALA found site to not be deliverable or developable |
| No | S003 a | CP003 | Land off Brockhampton Lane | The site is too small to allocate |
| No | S004 | CP004 | Land at Hunting Butts (west) | SALA found site to not be deliverable or developable |
| No | S005 | CP005 | Land at Hunting Butts (south), Swindon Lane | SALA found site to not be deliverable or developable |

| Preferred Housing site or mixed use allocation | Site Ref | CP I&O Ref (IA Ref) | Site Name | Reason for exclusion from Preferred Options |
|--|----------|---------------------|---|--|
| No | S006 | CP006 | Land at Hunting Butts (central) west of railway cutting | SALA found site to not be deliverable or developable |
| No | S007 | CP007 | Land at Hyde Farm (east section) | SALA found site to not be deliverable or developable |
| No | S008 | CP008 | Blooms Garden Centre, Evesham Road | SALA found site to not be deliverable or developable |
| No | S009 | CP009 | Hunting Butts Farm, east of railway cutting | SALA found site to not be deliverable or developable |
| No | S010 | CP010 | Land south of Hunting Butts Farm, Swindon Lane | SALA found site to not be deliverable or developable |
| No | S011 | CP011 | The Paddocks, Swindon Lane | SALA found site to not be deliverable or developable |
| No | S012 | CP012 | Land at Hunting Butts (east), Evesham Road | SALA found site to not be deliverable or developable |
| No | S013 | CP013 | Cheltenham Racecourse (north) | SALA found site to not be deliverable or developable |
| No | S014 | CP014 | Cheltenham Racecourse (south) | SALA found site to not be deliverable or developable |
| No | S015 | CP015 | Land off New Barn Lane 1 (south of Racecourse) | SALA found site to not be deliverable or developable |
| No | S016 | CP016 | Land off New Barn Lane 2 (south of Racecourse) | SALA found site to not be deliverable or developable |
| No | S017 | CP017 | Land off New Barn Lane 3 (south of Racecourse) | SALA found site to not be deliverable or developable |
| No | S018 | CP018 | Land east of Cheltenham Racecourse 1, Lake Street | SALA found site to not be deliverable or developable |
| No | S019 | CP019 | Land east of Cheltenham Racecourse 2, Park Lane | SALA found site to not be deliverable or developable |
| No | S020 | CP020 | Land north of Cheltenham Racecourse | SALA found site to not be deliverable or developable |
| No | S021 | CP021 | Land between Cheltenham Racecourse and B4632 | SALA found site to not be deliverable or developable |
| No | S022 | CP022 | Land at Prestbury | SALA found site to not be deliverable or developable |
| Mixed use | S023 | CP023 | Priors Farm Fields (Land at Oakley) | Significant sustainability issues (landscape) |
| No | S024 | CP024 | Castle Dream Stud, Mill Lane | SALA found site to not be deliverable or developable |
| No | S025 | CP025 | Land at Mill Lane | SALA found site to not be deliverable or developable |
| No | S026 | CP026 | Land north of Greenway Lane | SALA found site to not be deliverable or developable |
| No | S027 | CP027 | Land south of Greenway Lane | SALA found site to not be deliverable or developable |
| No | S028 | CP028 | Land adjacent to Orchard Cottages | SALA found site to not be deliverable or developable |
| No | S029 | CP029 | Land south of Glenfall Way | SALA found site to not be deliverable or developable |
| No | S030 | CP030 | Land off Timbercombe Lane | SALA found site to not be deliverable or developable |
| No | S031 | CP031 | Land off Leckhampton Road | Site has planning permission: 15/00681/FUL |

| Preferred Housing site or mixed use allocation | Site Ref | CP I&O Ref (IA Ref) | Site Name | Reason for exclusion from Preferred Options |
|--|----------|---------------------|--|--|
| No | | CP032 | Land at Sunnyfield Lane (south), Up Hatherley Way | SALA found site to not be deliverable or developable |
| No | S040 | CP033 | Land at Sunnyfield Lane (north), Up Hatherley Way | SALA found site to not be deliverable or developable |
| No | S041 | CP034 | Arle Nursery and allotments, Old Gloucester Road | SALA found site to not be deliverable or developable |
| No | S042 | CP035 | Land at Old Gloucester Road | SALA found site to not be deliverable or developable |
| No | S043 | CP036 | Land at Fiddler's Green, Fiddler's Green Lane | SALA found site to not be deliverable or developable |
| No | S044 | CP037 | Land at Fiddler's Green, adjacent to Hayden | SALA found site to not be deliverable or developable |
| No | S045 | CP038 | Land at Golden Valley, Pheasant Lane | SALA found site to not be deliverable or developable |
| No | S046 | CP039 | Land north of Bamfurlong Lane | SALA found site to not be deliverable or developable |
| No | S047 | CP040 | Briarfields Motel and Touring Park, Bamfurlong Lane | SALA found site to not be deliverable or developable |
| No | S048 | CP041 | Land between A40 and Bamfurlong Lane (east) | SALA found site to not be deliverable or developable |
| No | S049 | CP042 | Land between A40 and Bamfurlong Lane (west) | SALA found site to not be deliverable or developable |
| No | S050 | CP043 | Land at The Reddings, north of Branch Road | SALA found site to not be deliverable or developable |
| No | S051 | CP044 | Land at The Reddings, south of Branch Road | SALA found site to not be deliverable or developable |
| No | S052 | CP045 | Land at the Hayloft (west), The Reddings / Badgeworth Road | SALA found site to not be deliverable or developable |
| No | S053 | CP046 | Land at the Hayloft (east), south of The Reddings | SALA found site to not be deliverable or developable |
| No | S054 | CP047 | Flowerdale Farm, The Reddings | SALA found site to not be deliverable or developable |
| No | S055 | CP048 | Land at Stansby Mobile Home and Touring Caravan Park, The Reddings | SALA found site to not be deliverable or developable |
| No | S056 | CP049 | Land west of Grovefield Way, The Reddings | SALA found site to not be deliverable or developable |
| No | S057 | CP050 | Land off Grovefield Way, The Reddings | SALA found site to not be deliverable or developable |
| No | S058 | CP051 | Land r/o Shakespeare Cottages, The Reddings | SALA found site to not be deliverable or developable |
| Housing | S059 | CP052 | Springbank Shopping Centre | Promotes plan objectives and aligns with strategy |
| No | S060 | CP053 | Land adjacent to former Goat and Bicycle Public House | SALA found site to not be deliverable or developable |
| Mixed use | S061 | CP054 | Land and buildings at Coronation Square | Site has mixed ownership but could come forward as a mixed regeneration scheme |
| No | S062 | CP055 | Community Centre & Scout Hut, Brooklyn Road | SALA found site to not be deliverable or developable |

| Preferred Housing site or mixed use allocation | Site Ref | CP I&O Ref (IA Ref) | Site Name | Reason for exclusion from Preferred Options |
|--|----------|---------------------|---|---|
| No | S063 | CP056 | Rowanfield Exchange, Devon Avenue | No net gain expected. Site is unlikely to come forward within the plan period. |
| Housing | S064 | CP057 | Christ College Site B | Promotes plan objectives and aligns with strategy |
| No | S065 | CP058 | Outer West, Land at Tewkesbury Road | SALA found site to not be deliverable or developable |
| No | S066 | CP059 | The Folley, Gardner's Lane | SALA found site to not be deliverable or developable |
| No | S067 | CP060 | Cheltenham Spa Railway Station | SALA found site to not be deliverable or developable |
| Housing | S068 | CP061 | Land at Lansdown Road (Gloucestershire Constabulary Headquarters) | Promotes plan objectives and aligns with strategy |
| No | S069 | CP062 | Commercial Street Car Park | SALA found site to not be deliverable or developable |
| No | S070 | CP063 | Reeves Field, Old Bath Road | Lack of evidence that playing fields loss, and landscape and conservation area impact can be satisfactorily mitigated |
| No | S071 | CP064 | King Alfred Way 1 & 2 | SALA found site to not be deliverable or developable |
| No | S072 | CP065 | St Edwards Car Park, London Road | SALA found site to not be deliverable or developable |
| No | S073 | CP066 | Ellerslie Care Home, Albert Road | Site has planning permission: 13/01861/FUL |
| Mixed use | S074 | CP067 | Prestbury Road / Windsor Street 1 | Part of larger mixed use site with S123 |
| No | S075 | CP068 | Prestbury Road / Windsor Street 2 | SALA found site to not be deliverable or developable |
| No | S076 | CP069 | Cakebridge Place | SALA found site to not be deliverable or developable |
| No | S077 | CP070 | Land at Prestbury Road | SALA found site to not be deliverable or developable |
| No | S078 | CP071 | Bences Timber Yard, St Johns Avenue | SALA found site to not be deliverable or developable |
| No | S079 | CP072 | Sherborne Place Car Park | SALA found site to not be deliverable or developable |
| No | S080 | CP073 | Axiom, 57 Winchcombe Street | Site has planning permission: 15/02268/FUL |
| No | S081 | CP074 | Rodney Road Car Park, Rodney Road | SALA found site to not be deliverable or developable |
| Mixed use | S082 | CP075 | Royal Well & Municipal Offices | Promotes plan objectives and aligns with strategy |
| No | S083 | CP076 | St Georges House, Bayshill Road | Site has planning permission: 15/00786/FUL |
| No | S084 | CP077 | Land at St Georges Place / St James Square | SALA found site to not be deliverable or developable |
| Housing | S085 | CP078 | Rivershill House, St Georges Road | Employment but planning permission for housing has been granted but it is pending a legal agreement |
| No | S086 | CP079 | Elim Pentecostal Church, St Georges Road | SALA found site to not be deliverable or developable |

| Preferred Housing site or mixed use allocation | Site Ref | CP I&O Ref (IA Ref) | Site Name | Reason for exclusion from Preferred Options |
|--|----------|---------------------|---|--|
| No | S087 | CP080 | Land adjoining Great Western Road | SALA found site to not be deliverable or developable |
| No | S088 | CP081 | Land at Chester Walk Car Park | Site is too small to allocate |
| No | S089 | CP082 | Rear of High Street Car Park | SALA found site to not be deliverable or developable |
| No | S090 | CP083 | Henrietta Street Car Park, St Margarets Road | SALA found site to not be deliverable or developable |
| No | S091 | CP084 | 47 - 51 Swindon Road | Site has planning permission: 15/00354/FUL |
| No | S092 | CP085 | Land adjoining Kynance, Church Road | Site capacity is below 10 units |
| Housing | S093 | CP086 | Former Monkscroft Primary School | Promotes plan objectives and aligns with strategy |
| No | S094 | CP087 | Land at Stone Crescent | Site has planning permission: 14/01276/OUT but no S106. Site is too small to allocate |
| No | S095 | CP088 | Pittville School, New Barn Lane | Site has planning permission: 15/01163/OUT |
| No | S096 | CP089 | Pittville Campus | Site has planning permission: 14/01928/FUL |
| No | S098 | CP090 | Land adjacent to Ellerslie, Albert Road | The site functions as an important space between existing buildings. There are strong concerns over the impact of any development of the site in terms of built form, impact on heritage assets and amenity. |
| No | S099 | CP091 | Hardwick Site, St. Pauls Road | SALA found site to not be deliverable or developable |
| No | S100 | CP092 | Park Campus | SALA found site to not be deliverable or developable |
| No | S101 | CP093 | Depot | SALA found site to not be deliverable or developable |
| No | S102 | CP094 | Sandford Lido Car Park | SALA found site to not be deliverable or developable |
| No | S103 | CP095 | St James's Street Car Park | SALA found site to not be deliverable or developable |
| No | S104 | N/A | Bath Road Car Park | SALA found site to not be deliverable or developable |
| No | S105 | CP096 | St. George's Road Car Park | SALA found site to not be deliverable or developable |
| No | S106 | CP097 | Bath Terrace Car Park | SALA found site to not be deliverable or developable |
| No | S107 | CP098 | Land south of Collum End Rise | SALA found site to not be deliverable or developable |
| No | S108 | CP099 | Land at Swindon Lane (Adj to dismantled line) | SALA found site to not be deliverable or developable |
| No | S109 | CP100 | Battledown | SALA found site to not be deliverable or developable |
| Mixed use | S110 | CP101 | North Place and Portland Street | Mixed use allocation in previous Local Plan |
| No | S111 | CP102 | Spirax Sarco HQ, Charlton House | SALA found site to not be deliverable or developable |

| Preferred Housing site or mixed use allocation | Site Ref | CP I&O Ref (IA Ref) | Site Name | Reason for exclusion from Preferred Options |
|--|----------|---------------------|--|--|
| No | S112 | CP105 | Land at Whaddon Road | Site capacity is below 10 units |
| Housing | S113 | N/A | Premiere Products, Bouncers Lane | Promotes plan objectives and aligns with strategy |
| No | S114 | N/A | Land Adjacent to Timbercombe Farm, Little Herberts Road, Charlton Kings | SALA found site to not be deliverable or developable |
| No | S115 | N/A | Land to rear of 291-297 Cirencester Road, Charlton Kings | SALA found site to not be deliverable or developable |
| No | S116 | N/A | The East Gloucestershire Club, Old Bath Road; | Site capacity is below 10 units |
| No | S117 | N/A | Land adjacent to Longfield, Charlton Kings | SALA found site to not be deliverable or developable |
| No | S118 | N/A | John Dower House, 24 Crescent Place, Cheltenham, Gloucestershire, GL50 3RA and South Court | SALA found site to not be deliverable or developable |
| No | S119 | N/A | Karenza, Naunton Parade (HLA ref: COL1052) | Site is too small to allocate |
| No | S121 | N/A | The Bredons, Harp Hill | SALA found site to not be deliverable or developable |
| No | S122 | N/A | Land rear of Nuffield Hospital, Hatherley Lane | Safeguarded employment site |
| Mixed use | S123 | N/A | 100 – 102 Prestbury Road, Cheltenham | Part of larger mixed use site with S074 |
| No | S124 | N/A | Park Corner and land to the west of Park Corner, Bowbridge Lane, Prestbury | SALA found site to not be deliverable or developable |
| No | S125 | N/A | Land north west of Racecourse | SALA found site to not be deliverable or developable |
| No | S126 | N/A | Land south west of Racecourse | SALA found site to not be deliverable or developable |
| No | S127 | N/A | Land south east of Ham Road | Site is within the AONB |

- 5.9 The Integrated Appraisal considered cumulative effects and the inter-relationships between sustainability topics for each site option where possible; uncertainty and any gaps in information were recorded also.

IA of Policies: Social, Economic, Environmental

Introduction

- 5.10 This Section sets out the findings of the IA of the Cheltenham Borough Local Plan Part 1 Preferred Options. It is structured according to three key topics which cover the development of the Local Plan to date and which have been linked to relevant SA Objectives as well as SEA Directive topics. The appraisal of these topics have been divided into a number of sub-headings to ensure that each aspect of the emerging Local Plan is considered,

including policies and site allocations, as well as the interrelationships between topics and cumulative effects of the Plan as a whole.

- 5.11 Further topics covering in particular the natural environment, design and the Historic Environment are not assessed in detail in this appraisal, given that the more detailed development management policies will arise in later development of the Cheltenham Local Plan Part 2. The Cheltenham Local Plan Part 2 will be subject to SA which will identify the potential effects of the implementation of the Plan Part 2 and the Cheltenham Borough Local Plan as a whole. In the absence of detailed development management policies at this stage of Plan production, the Council has decided to retain the saved policies from the 2006 review of the previous Cheltenham Borough Local Plan. The saved policies include core principle policies (e.g. sustainable development and design), built environment policies (e.g. historic environment protection policies), natural environment policies (including urban green environment policies), landscape policies, retailing policies, cultural and recreational policies, transport policies, and utilities infrastructure policies. These retained policies will provide protection and mitigation for potential negative effects arising as a result of new development.
- 5.12 These policies are further supported by the policy framework contained within the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (GCT JCS) and national planning policies. The GCT JCS was subject to SA which concluded that given the mitigation provided through the plan and recommendation of the SA, the level and distribution of development is unlikely to lead to any significant negative effects.
- 5.13 In accordance with the SEA Directive and Regulations any likely significant effects are identified along with any mitigation measures necessary to address them.

Housing

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 1: To ensure everyone has access to a high-quality home that they can afford and meets their needs

Appraisal of Cheltenham Borough Local Plan Policies

- 5.14 The overall level of housing growth is strategically set by the GCT JCS which seeks to deliver 35,175 new homes during the plan period. Policy SP1 in the Submission JCS (November 2014) sets a housing requirement of 10,917 new homes to be delivered in Cheltenham Borough between 2011 and 2031, with the distribution of development between the three authorities defined further in GCT JCS Policy SP2. Cheltenham Borough is unable to meet its full objectively assessed housing needs within the Borough boundary, and as such the JCS has determined strategic urban extensions on adjacent land which will support the future growth of Cheltenham. The urban extensions are identified as North West Cheltenham and West Cheltenham, which together

will deliver 5,385 new homes. The residual need of 5,532 dwellings will be met within the existing city boundary and is distributed across 9 allocations identified in Proposed Policy PR1 and 5 allocations for mixed-use development proposed in Policy PR2. This includes the Leckhampton site that has been subject to SA through the GCT JCS, and given significant reductions in numbers at this site, is now considered through the Local Plan.

- 5.15 Policies and allocations which deliver new housing have the potential for major long term positive effects on housing. Whilst the overall level of growth is determined by the GCT JCS, the Cheltenham LP seeks to deliver growth in areas with the least constraint (e.g. away from the Green Belt and AONB), to minimise potential negative effects arising.
- 5.16 It is considered that development in the Borough could be enhanced by further housing policies which seek to deliver an appropriate mix of types and tenures to meet the needs of the population in these local areas in line with the Plan and SA Objectives. Though it is recognised that this may emerge in later in the Cheltenham Borough Local Plan Part 2 as part of the more detailed development management policies, and is supported through Policy SD12 of the GCT JCS.
- 5.17 Gypsy and Traveller needs were assessed in the GCT JCS which has identified no need to deliver any new pitches within the Borough boundary. Affordable housing delivery targets are set in the GCT JCS, and the Cheltenham LP does not include any further policies relating to affordable housing.

Appraisal of Site Allocations

- 5.18 All of the proposed site allocations have the potential for long term positive effects on housing through the provision of residential development. Housing site allocations a) to g) are considered to have the potential for positive effects of greater significance given that these sites can be developed within the early stages of the plan period to address the existing housing backlog. The mixed-use site allocations are also considered to have positive effects of greater significance by delivering housing that is well connected to employment and infrastructure development. Housing Site Allocation i) is a combination of the previously assessed CP034 and CP035. Housing Site Allocation g) has a slightly amended boundary to that assessed as CP061, however this is not considered to significantly affect the findings of the assessment of site option CP061.

Synergistic and Cumulative Effects

- 5.19 Overall, the Cheltenham LP will have short to long term positive cumulative effects on housing through the provision of new homes to help meet the objectively assessed need of the Plan area as determined within the GCT JCS. The Cheltenham LP seeks to designate existing green spaces (Proposed Policy GE8) which will support housing and mixed-use development with the potential for major long term positive synergistic effects, through connected spaces, new green infrastructure network connections, and an attractive public realm which can attract continued investment and renewal.

Interrelationships with other Topics

- 5.20 The provision of housing and associated delivery of services and facilities also has the potential for indirect positive effects on a number of other topics, which include economy and employment, health and equalities, and transport and accessibility. Conversely, the delivery of housing also has the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change, water resources, water quality, flooding, the natural environment, cultural heritage and waste and recycling. The potential indirect effects are mitigated by other saved policies from the 2006 review of the Cheltenham Local Plan, and through higher level policies provided through the GCT JCS and NPPF.

Economy and Employment

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 2: Ensure the availability of employment land and premises to encourage inward investment, support the growth of existing businesses and the vitality of the town and its suburbs

Appraisal of Cheltenham Local Plan Policies

- 5.21 Policy SP1 in the GCT JCS plans for the delivery of new employment land to support around 39,500 new jobs. Policy SD2 supports economic development within the identified strategic allocations in the GCT JCS, as well as within Gloucester, Cheltenham and Tewkesbury town. GCT JCS Policy SD3 identifies that new retail development will be encouraged in accordance with the saved policies of the existing Cheltenham Local Plan (saved from the 2006 review).
- 5.22 The delivery of new employment land outlined in Policy EM3 has the potential for major long term positive effects on the economy by helping to meet the employment needs of the Plan area. The Cheltenham LP further seeks to support economic development through the safeguarding of existing key employment sites, including non-designated employment sites which is likely to lead to major long term positive effects by retaining and supporting existing businesses to thrive and grow.
- 5.23 Policy PR2 further seeks to deliver mixed-use development, which can indirectly lead to long-term major positive effects on the economy by increasing accessibility and supporting comprehensive development to meet local needs. This is supported by Policy EM5 which seeks to safeguard the former Honeybourne rail line, recognising its value as a future sustainable transport corridor linked to economic areas.
- 5.24 Policy EM4 seeks to promote the economic strengths of Cheltenham (the cyber-security sector) which is likely to lead to long term major positive effects

by increasing the opportunity to economies distinct to Cheltenham and of high value.

- 5.25 It is considered that the economic policies could be enhanced by recognition of the tourism values within Cheltenham, particularly Cheltenham Racecourse, which supports local economies and local economic distinctiveness. However it is recognised that retail and tourism is likely to be considered in Part 2 of the Cheltenham Local Plan.

Appraisal of Site Allocations

- 5.26 The employment site allocations have the potential for long term positive effects on the economy through the provision of new employment land. Allocation E3 is considered to have positive effects of greater significance given the larger scale of development at this site. Allocation E1 is located centrally and as such is well connected to the central area infrastructure, services and facilities and easily accessible by existing public transport routes, which will support access to employment opportunities for local residents.

Synergistic and Cumulative Effects

- 5.27 Overall the policies contained within the Cheltenham LP seek to deliver the identified employment growth needs, protect and enhance existing employment areas, and restrict the loss of existing employment areas with the potential for minor to major long term positive cumulative effects.

Interrelationships with other Topics

- 5.28 The provision of new employment land has the potential for indirect positive effects on health and equalities, and transport and accessibility. However, there is also the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change and flooding, water resources, water quality, flooding, natural environment, cultural heritage and waste and recycling. The potential indirect effects are mitigated by other saved policies from the 2006 review of the Cheltenham Local Plan, and through higher level policies provided through the GCT JCS and NPPF.

Equality Impact Assessment (EqIA)

- 5.29 Under the Equality Act 2010, public authorities such as Cheltenham Borough Council must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
 - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
 - Foster good relations between people who share a characteristic and those who do not share a characteristic.

- 5.30 An EqlA is a tool which seeks to improve the work of the Council and ensure that they meet the requirement of the Equality Act 2010. This Act applies to the provision of services and public functions and includes the development of Council policies and plans. The Act prevents discrimination on the basis of nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 5.31 Inequality can exist in a number of forms and where land use planning is concerned, this can include inadequate provision of and access to services (health, food stores, education facilities), good quality homes, employment opportunities, a healthy living environment and transport infrastructure (roads, pavements, public transport) for all members of society.
- 5.32 It is important to note that assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the Integrated Appraisal (IA) process. All aspects of the developing Cheltenham Local Plan have been appraised against a IA framework including several IA objectives that directly and indirectly address equality, health and diversity and these include: No.1 – Housing; No.2 Economy & Employment; No. 3 Healthy Communities; No. 4 Accessibility to Services (including health & education); No. 5 Accessibility to Public Transport; No. 7 Air Quality; No. 11 Landscape; No.12 Historic Environment and No. 13 Cultural Heritage. The findings of this EqlA have been integrated into the IA of the Cheltenham Local Plan and are provided separately as Appendix VIII to the Draft IA Report.
- 5.33 The screening assessment has found that the Cheltenham Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required.

Habitats Regulations Assessment (HRA)

- 5.34 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites⁴⁶.
- 5.35 The HRA process for the Cheltenham Local Plan will be informed by the findings and conclusions of the HRA process for the JCS. The Pre-Submission Draft JCS HRA Report⁴⁷ (May 2014) concluded that the mitigation provided through JCS policies and available at the project level is sufficient to ensure that there will be no adverse effects on any European sites as a result of proposed development either alone or in combination.
- 5.36 An initial screening assessment of the Cheltenham Local Plan was carried out to determine if the emerging policies and potential sites have the potential

⁴⁶ These include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

⁴⁷ <http://www.gct-jcs.org/PublicConsultation/SAPR-Sustainability-Appraisal-Pre-Submission.aspx>

for likely significant effects on any European sites. The screening found that the development proposed in the Cheltenham Local Plan is considered unlikely to have significant effects on any European sites alone or in-combination with other plans and projects.

6.0 INTEGRATED APPRAISAL OF THE PRE-SUBMISSION CHELTENHAM PLAN (REGULATION 19) (November 2017)

Context

- 6.1 **Joint Core Strategy:** As a result of issues raised and discussions held at the independent examination of the Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS), proposed main modifications were published for consultation between 27 February and 10 April 2017. These were further considered at the resumed examination in July 2017. The Inspector's final report⁴⁸ (October 2017) confirmed the uplift in housing numbers, including a minimum requirement of 10,917 dwellings for Cheltenham (para 55). The strategic allocation at Leckhampton (A6) was confirmed to be unsound; however, a reduced allocation is considered to be appropriate for the Cheltenham Plan.
- 6.2 The cross-boundary strategic urban extensions at North West Cheltenham and West Cheltenham (subject to SA through the JCS) were confirmed (para 104) – both are partly within Tewkesbury Borough. As these strategic sites will take time to deliver, the Inspector recommended that a stepped approach is justified for Cheltenham – 450 dwellings per annum from 2011-22 and a stepped increase to 663 dwellings per annum from 2022-31. The NW Cheltenham land is safeguarded (4,285 dwellings) at present for reasons of deliverability due to traffic issues, but has potential for future development; a green buffer must be retained around Swindon village. The W Cheltenham land is safeguarded (1,100 dwellings) and cannot be allocated currently due to odour emission issues from the Hayden Sewage Treatment Works. Odour modelling will identify where development can occur and potential areas for future development.
- 6.3 **The Cheltenham Plan:** The Part One Preferred Options draft plan was subject to consultation for six weeks from 6 February to 20 March 2017, and focused on three policy areas:
- Economic strategy
 - Potential local green space designations
 - Potential development site allocations

All responses are available to view online⁴⁹ and a consultation statement is available.

- 6.4 The Council considered the representations received and any updated evidence, including a further call for sites⁵⁰ that may be suitable for future development, in order to prepare the next draft of the Plan – Pre-Submission

⁴⁸ <https://jointcorestrategy.org/examination>

⁴⁹ <http://consult.cheltenham.gov.uk/consult.ti/cododdo/consultationHome>

⁵⁰ https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan/3

Regulation 19 consultation. The Council decided to bring forward its work to prepare the development management policies, rather than prepare a Part Two Plan. All components of the plan (Vision, Objectives, Policies & proposed Site Allocations) are integrated and presented in the Pre-Submission Cheltenham Plan.

- 6.5 **Integrated Appraisal (IA):** The IA Report (incorporating SA/SEA, HRA and EqIA) (October 2016) accompanied the Preferred Options Plan on consultation. The details of comments received are presented in Appendix V of this IA Report (November 2017). The Environment Agency had no specific comments on the SA and HRA but raised issues for site option selection and plan-making associated with requirements for Strategic Flood Risk Assessment (SFRA) Level 2 and as foul drainage infrastructure assessment (as part of the Infrastructure Delivery Plan).
- 6.6 Natural England (NE) did not agree with the conclusion of the HRA Screening (October 2016) of no likely significant effects with regard to the Cotswold Beechwoods Special Area of Conservation (SAC). They assert that the Cheltenham Plan area is approximately 5km from the Cotswold Beechwoods SAC. Whilst most of the site allocations are over 10km from the Cotswold Beechwoods SAC, as yet there is no strategic understanding of where visitors come from and how they use the SAC, no established zone of influence for recreational pressure and no mitigation plan. In combination impacts must also be considered. Without this information NE advised that it is not possible to reach a conclusion of no likely significant effects from the Cheltenham Plan based on distance alone. It may be noted that at this time, discussions were ongoing between the JCS authorities and NE in respect of the Cotswold Beechwoods SAC and the emerging final JCS.
- 6.7 Historic England had no comments on the SA or HRA but recommended a specific heritage policy in the Plan. Highways England did not have any comments on the SA or HRA but noted that they could not support an all-movement M5 J10 at this time, and that further modelling/evidence is required.
- 6.8 One respondent asserted that the SA Report (October 2016) did not include a comparative assessment of potential sites and is not transparent. The SA is only required to carry out a comparative assessment using the SA objectives/criteria of those options that are considered to be reasonable. Table 5.1 sets out the reasons for selection or rejection of site options. Comparative assessment was undertaken and reported in detail in Appendix VI; however, summary table now included here in this Section 6 of the SA Report to present explicitly the comparative analysis.
- 6.9 Another respondent was concerned that there should a full Health Impact Assessment to address well recorded concerns are in respect of unacceptable levels of air or soil pollution, odours both alone or cumulatively. The SA response explained that there was no requirement for a full HIA of the plan but that the SA Framework of Objectives includes consideration of Health/Well-being (No 3), Transport & Traffic (Nos 5&6), Air Quality (No 7),

Water (No 8) and Soils (No 14); and that the SA considers the cumulative effects of the emerging elements of the draft Plan.

- 6.10 A final respondent was concerned about when and how air pollution is to be recognised and tackled in the Local Plan. This is a matter for plan-making but the SA response explained that the SA Framework includes consideration of Health/Well-being (No 3), Transport & Traffic (Nos 5&6), and Air Quality (No 7).

The Pre-Submission Regulation 19 Cheltenham Plan

- 6.11 The Cheltenham Plan comprises the same as the Preferred Options for the three themed Vision and Objectives – with only minor amendments made as a result of consultation. The Objectively Assessed Need (OAN) for Cheltenham has been assessed as part of the JCS process; the overall housing requirement for the whole of the JCS area between 2011 and 2031 is 35,175 dwellings with the Cheltenham-specific figure being 10,917 units– and as set out the JCS Policy SP1. The Strategic Allocations have been confirmed at 5,385 dwellings through the safeguarded sites at North West Cheltenham (4,285 dwellings) and West Cheltenham (1,100 dwellings) and to be delivered later in the plan period. Land allocated for housing and mixed-use development is set out in two new policies H1 and H2 respectively (previously RD1-2).
- 6.12 The Plan includes further locally specific development management Policies to guide development (and building upon the strategic policies in the JCS) in chapters as follows:
- Employment (EM1-6)
 - Design Requirements (D1-3)
 - Green Belt (GB1-2)
 - Historic Environment (HE1-5)
 - Residential Development (H 1-2)
 - Housing Mix & Standards (HM1-5)
 - Gypsy, Travellers, & Travelling Showpeople Sites (GT1)
 - Health & Environmental Quality (SL1)
 - Access to the Transport Network (TN1-2)
 - Green Infrastructure (GI1-3)
 - Social & Community Infrastructure (CI1-4)

Integrated Appraisal (IA) Findings

- 6.13 **Vision & Objectives:** Minor amendments were made to the Vision & Objectives. Theme A (g) was amended for clarification and a new criterion (j) added to “*improve health outcomes by promoting and prioritizing active health*”; this will confirm and enhance the previous positive compatibility for SA Objectives Health/Well-being (No 3), Transport & Traffic (Nos 5&6), and Air Quality (No 7). Clarification and stronger aims are carried into Themes B criterion (d) & C criterion (e) seeking to deliver a range of sustainable transport choices and recognising the multi-functionality of green spaces that

link pedestrian and cycle routes. Again, the clarifications to the criteria strengthen the positive compatibility effects found at the Preferred Options stage, which remain valid and relevant.

- 6.14 **Site Allocation Options:** All options for possible site allocation that were deemed to be reasonable (realistic and deliverable in the plan period) were subject to IA and the findings detailed in the IA Report accompanying the Preferred Options Plan (October 2016) and including here in this IA Report as Appendix VII. The IA findings were discussed and as presented in Section 5 previously in this IA Report, including the reasons for selection or rejection of options (Table 5.1). At the time of assessment in 2016, strong mitigation measures for potential negative effects were available through the strategic policies in the higher-level plan – the JCS – notably SD4 sustainable Design & Construction, SD8 Cotswold AONB, SD9 Historic Environment, SD10 Biodiversity & Geodiversity, SD13 Affordable Housing, INF3 Flood Risk Management, INF6 Renewable Energy/Low Carbon Development, INF7 Infrastructure Delivery, and INF8 Developer Contributions. This Pre-Submission Cheltenham Plan includes locally specific policies that provide further mitigation for negative effects and this has been taken into account when updating the SA of the site allocations.
- 6.15 **Development Management & Allocation Policies:** The Preferred Options Plan included draft policies EM1-3 & 5; minor wording change for clarification, otherwise policies remain the same in the Pre-Submission Plan. Policies RD1-2 allocating land for housing and mixed use are now renamed Policies H1-2 and include some changes to sites. Land off Oakhurst Rise is a new site added to Policy H1 for housing development; Leckhampton is a new site that had previously been considered as a strategic site for the JCS – now considered more suitable as a non-strategic site in the Cheltenham Local Plan. Lansdown Industrial Site is a new mixed-use site that is included in Policy H2 Mixed Use Development. The detailed SAs of these additional site options are presented in Appendix VII of this IA Report.
- 6.16 The Preferred Options Draft Plan also included Policy TN1 protecting the route of the former Honeybourne railway line, which remains the same but is now part of the transport section rather than the economy section. Policy GI1 remains the same but includes more sites for public open/green space rather than having another separate policy. Therefore, the IA of the previous Plan elements remains valid and relevant.
- 6.17 The Pre-Submission Plan now includes additional locally specific development management policies as listed above in paragraph 6.12 of this report. The locally specific requirements provide more detail and more certainty for implementation of potential mitigation measures for any local negative effects identified; also, implementation of any possibilities for enhancement and positive effects. This IA has sought to build upon the previous IA and consider the implementation of the draft Plan as a whole on sustainability themes as follows:

Housing

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- No 1: To ensure everyone has access to a high-quality home that they can afford and meets their needs

6.17 Policy H1 Housing Development lists the sites allocated for housing development and includes two new sites – Land off Oakhurst Lane (80-100 dwellings) & Leckhampton (350 dwellings) – detailed SA findings in Appendix VII of this SA Report. The Policy continues to include sites b, d, h and l; sites c, e and g are not progressed at this stage as they already have planning permission now. Previous site f is now called Bouncers Lane and included as an allocation (part has planning permission). The Leckhampton site (previously site h) had been a strategic locational option (>500 dwellings) considered in the GCT JCS but was found through the examination to only be suitable for a local site allocation (350 dwellings) due to concerns about landscape and visual amenity impacts. The new allocations for land off Oakhurst Lane, Stone Crescent & Brockhampton Lane are now progressed to help meet the identified local need for housing. The Priors Farm site has been moved from mixed-use to housing policy. Site a is not progressed because of heritage and landscape concerns.

6.18 The allocations for local (non-strategic) development sites is shown in the table following:

| Policy H1: Allocated Local Sites | Number of Dwellings |
|---|----------------------------|
| Christ College Site B | 70 |
| Land at Lansdown Road | 45 |
| Reeve's Field | 80 |
| 100-102 Prestbury Road | 40 |
| Former Monkscroft Primary School | 60 |
| Bouncer's Lane | 70 |
| Land off Oakhurst Rise | 80-100 |
| Land at Stone Crescent | 15-20 |
| Brockhampton Lane | 20-25 |
| Prior's Farm Fields | 90 |
| Leckhampton | 350 |
| Old Gloucester Road | 200 |

6.19 Certain major negative effects on air quality, transport, landscape and health had been identified in the October 2016 Initial SA Report (Appendix VII) for several of the potential site allocation options. This included five of the options that are now local allocation sites in the Regulation 19 Plan, as follows:

- Monkscroft primary school
- Brockhampton Lane

- Priors Farm fields
- Coronation Square
- Old Gloucester Road

- 6.20 Monkscroft primary school, Coronation Square and Old Gloucester Road all had potential major negative effects on transport and air quality, with some uncertainty. However, mitigation is available through the development management policies in both the GCT JCS and the Draft Cheltenham Local Plan. JCS policies INF1-4 and INF6 Renewable Energy/Low Carbon Energy Development and Cheltenham Plan Policies TN1-2 will favor public transport and therefore reduce emissions from private vehicles. Furthermore, the sites have good access to sustainable transport and services/facilities, such that an increase in private vehicle use is less likely. Therefore, taking into consideration the available Policy mitigation, it is considered major negative effects are reduced to a neutral effect.
- 6.21 Brockhampton Lane, Priors Farm fields and Old Gloucester Road were all considered to have major negative effects on landscape. However, the JCS contains mitigation through Policy SD7 Landscape and SD8 Cotswold AONB. These policies will protect the landscape in and around Cheltenham and the setting of the AONB from the effects of new development. Further mitigation is provided through Local Plan Policy L1 and Local Plan Policies D1-3. Therefore, with mitigation available it is considered that major negative effects are reduced to neutral.
- 6.22 Further major negative effects had been indicated for health at the Priors Farm Fields site due to the distance for access to the walking/cycle network for Coronation Square. However, mitigation is available for Priors Farm through Local Plan Policy CI2 which requires new development to contribute to meeting local open space and sports standards, reducing major negative effects to neutral. Coronation Square has good sustainable transport links via bus, and therefore is less likely to result in increased car use. Major negative effect reduced to minor negative.
- 6.23 Policy H2 Mixed Use Development retains Land at North Place/Portland Place (previously site e) and a new site at Lansdown Industrial Estate includes housing provision of 143 plus 180 respectively. The new allocation for land at the Lansdown Industrial Estate is included to help meet the identified local need for housing whilst retaining important employment land. Policy H2 also now progresses Land at Coronation Square and at Royal Well/Municipal Offices. Policy GT1 Gypsy, Traveller & Travelling Showpeople Sites is a new policy setting out a location for 3 pitches at Mill Lane. Policies HM1-5 set out guidance for specific types of housing – student; elderly; loss of residential accommodation; agriculture & forestry dwellings; and houses in multiple occupation. Policies GB1-2 carry forward the approach to building in the Green Belt providing mitigation measures to safeguard the principles & aims of the Green Belt designation.

- 6.24 The reasons for selecting or rejecting reasonable alternative site options for allocation remain valid and as reported in the SA Report (2016) and as set out here in this report in Table 5.1. Allocations proposed at the Regulation 18 consultation (February-March 2017) have been updated to take account of some sites gaining planning permission and other suitable sites coming forward. New site options have been subject to SA and reported here within the updated Appendix VII. Overall, the land allocated for housing in H1-2 & GT1 will have major positive effects on SA objective for housing with cumulative effects in the longer term. Policies GT1 and HM1-5 further support the positive effects and help ensure that the needs of all are met.
- 6.25 At a late stage of plan-making and assessment, Gloucester County Council advised the need for a secondary school and that the Leckhampton site was preferred. This means that the proposed development changes from around 330 dwellings to around 200-250 dwellings plus the school. The implications for the overall findings of the SA are not significant: the quantum of housing remains sufficient that affordable units can be provided and maintains the major positive effects for SA objectives on housing for all; the provision of a new school will ensure that there is educational capacity for existing and new communities in the area into the longer term, thus confirming the likely positive effects for SA objectives on provision and access to services/facilities. The JCS and other Plan Policies will ensure that there are no significant negative effects arising from the change of proposed development.

Economy, Employment & Tourism

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- No 2: Ensure the availability of employment land and premises to encourage inward investment, support the growth of existing businesses and the vitality of the town and its suburbs

- 6.26 Policies EM1-3 & EM5 were EM1-4 in the Preferred Options and there have been no significant changes such that the major positive effects for economy and employment are confirmed. New Policy EM1 requires provision of an Employment Skills Plan for major employment development to identify opportunities for local people. This will have further positive effects for sustainable transport through helping to avoid the need for people to travel outside the area for work. New Policy EM6 carries forward the previous approach to conversion of rural buildings, safeguarding existing or planned uses for agriculture with positive effects for such viability and employment.

Healthy Communities

SEA Directive Topics: Population & Human Health, Material Assets

Relevant SA Objectives:

- No 3: Support communities with inclusive design, promote healthy lifestyles and reduce inequalities in wellbeing and opportunity.
- No 4: Improve provision and accessibility to services and facilities, including health and educational facilities.

- 6.27 Provision of land for housing and employment will contribute to SA objectives for communities/population and health. Policy D1 confirms the previous approach to design and sets out how the local approach will accord with the requirements in the JCS. Policy D2 sets out requirements for advertisements, signs & hoardings providing mitigation measures against potential negative effects on visual amenity. Policy D3 sets out the requirements with regard to private green space which is a particular issue for Cheltenham. The policy seeks to ensure that the value of such spaces is understood and maintained in order to contribute to a strategic approach for enhancing the townscape and environmental value of Cheltenham's green space – all with positive effects for human health.
- 6.28 New Policies CI1-4 provide guidance to ensure that adequate services and facilities are associated with new development, indicating positive effects for SA objectives. Policy CI1 will ensure that development is only permitted where adequate community infrastructure is available or can be provided. Policy CI2 ensures that new development will contribute to meeting local open space and sports standards – with positive effects also for health that will be cumulative in the longer term. Policy CI3 provides mitigation through compensation for any loss of allotment land – with neutral effects. Policy SL1 Safe & Sustainable Living requires development to address crime/fear of crime, security and amenity of adjacent land users – providing strong mitigation measure for potential negative effects. New Policy CI 4 requires new development to be served by high speed and reliable broadband with positive effects; also supporting other SA objectives such as reducing the need to travel as this might encourage home-working.

Sustainable Transport

SEA Directive Topics: Population & Human Health; Material Assets

Relevant SA Objectives:

- No 5: Maximise the use of sustainable modes of transport and reduce the need to travel by car
- No 6: To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth.

- 6.29 Policy TN1 is retained and now located in the Transport section of the Plan with positive effects for the longer term in protecting the route of the former Honeybourne rail line. New Policy TN2 seeks to encourage more sustainable transport by discouraging any new long-stay carparking in the Core Commercial Area – with positive effects.

Air Quality & Climate Change

SEA Directive Topics: Air; Climatic Factors

Relevant SA Objectives:

- No 7: To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases

- 6.30 The adopted GCT JCS (2017) includes policies that guide new development with the aims of mitigating effects and adapting to climate change – JCS INF1-4 and INF6 Renewable Energy/Low Carbon Energy Development. These JCS Policies together with the Cheltenham Plan Policies TN1-2 will further support the SA objective. Air quality is closely associated with emissions from vehicles – JCS and Cheltenham Plan Policies that discourage the use of private vehicles and promote more sustainable transport are likely to have positive effects on air quality, particularly in the longer-term.

Flooding, Water Resources and Water Quality

SEA Directive Topics: Water; Material Assets

Relevant SA Objectives:

- No 8: To reduce the demand for water, and maintain and improve the quality of water
- No 9: To manage and reduce flood risk.

- 6.31 The adopted GCT JCS (2017) includes Policy INF3 Flood Risk Management that ensures new development conforms to national policy with at least neutral effects. As part of ongoing commitments to reducing flood risk in the county, the JCS authorities will, subject to meeting other national and local policy objectives, support any development that contributes to the delivery of any proposed flood alleviation plans that have wider benefit to communities at risk in the JCS area – with potential for positive synergistic effects.

Biodiversity & Geodiversity

SEA Directive Topics: Biodiversity, Flora & Fauna; Heath

Relevant SA Objectives:

- SA Objective No 10: To safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats.

- 6.32 The adopted GCT JCS (2017) includes Policy SD10 Biodiversity & Geodiversity that requires conservation and enhancement of biodiversity on international, national and locally designated sites and other assets of demonstrable value - ensuring that new development has no unacceptable adverse impacts; thus at least neutral effects and potential positive effects if enhancement included in proposals. Policy INF4 explains how the JCS authorities will work together with stakeholders such as Natural England & the Environment Agency to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this.
- 6.33 Natural England had some concerns about the effects on the Cotswold Beechwoods SAC as a result of the Cheltenham Plan in response to the consultation on the Regulation 18 draft plan (February-March 2017) (please note Appendix V of this IA Report & separate HRA Report).
- 6.34 The Habitats Regulations Assessment (HRA) Screening Report (October 2014, updated May 2015 & October 2016) sets out how the GCT JCS will not have adverse effects, alone or in-combination, on the integrity of the identified European sites, and that there is no need to undertake further Appropriate Assessment. Mechanisms are in place to mitigate likely significant effects arising from increased traffic on the A46 (air quality) and increased recreational use (disturbance) in respect of Strategic Allocation A11 West Cheltenham that is some 2.3km from the Cotswold Beechwoods SAC – and as agreed through the Statement of Cooperation with Natural England. The HRA of the GCT JCS was found to be legally compliant through the examination process.
- 6.35 The JCS authorities are committed to working in partnership including with the environmental regulators for further discussions to identify and agree any necessary appropriate mitigation plan to ensure delivery of strategic green infrastructure. Cheltenham Borough Council will continue to consider the implications of the Local Sites in the Cheltenham Plan and the need for any visitor surveys to inform the development of any local green infrastructure plan- and in line with ongoing JCS discussions. Thus, the HRA screening continues to conclude that Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.
- 6.36 Local Plan Policy GI1 Local Green Space is progressed from the previous consultation draft and includes more sites, confirming positive effects that will be synergistic and cumulative for both biodiversity and human health. New Policy GI2 progresses the protection and replacement of trees and thus, contributes to these positive effects.

Landscape & Townscape

SEA Directive Topics: Landscape

Relevant SA Objectives:

- SA Objective No 11: Protect and improve the quality of the townscape and the broader landscape setting

- 6.37 The adopted GCT JCS (2017) includes Policy SD7 Landscape and SD8 Cotswold AONB – which protect the landscapes/townscapes and their settings from the effects of new development with at least likely neutral effects through mitigation measures such as screening and layout design. Local Plan Policy L1 complements the JCS policy and recognises the local distinctiveness and particular qualities that make Cheltenham special, thus confirming mitigation and ensuring no significant negative effects. Also, further supported by JCS Policy SD5 Design and Local Plan Policies D1-3.

Historic Environment

SEA Directive Topics: historic environment

Relevant SA Objectives:

- SA Objective No 5: To protect and enhance the area's distinctive historic environment, including known and potential archaeological sites, designated and non-designated heritage assets and their setting, in a manner appropriate to their significance.

- 6.38 The adopted GCT JCS (2017) includes Policy SD9 Historic Environment that requires new development to have regard to the JCS Historic Environment Assessment (HER) to demonstrate that potential impacts on heritage assets and appropriate mitigation measures have been addressed. Local Plan Policies HE1-3 & 5 set out requirements for locally specific issues in Conservation Areas, and HE4 covers national and local archaeological remains of importance. These policies ensure that any potential negative effects will be avoided or mitigated with residual neutral effects for SA objective on the historic environment.

Cultural Heritage

SEA Directive Topics: Cultural Heritage

Relevant SA Objectives:

- SA Objective No 13: To protect and enhance the area's distinctive qualities that form part of the attraction to and fondness for the area.

- 6.39 The JCS Policy SD8 Cotswold AONB includes specific reference to cultural heritage qualities with regard to the AONB. This is continued with the Local Plan that has not allocated any development sites in the AONB or the Green Belt. One site (Policy GT1) with 3 pitches is suggested at Castle Dream Stud,

Mill Lane for gypsies and travellers, a site that has been occupied since 2011 via a temporary permission, and the small scale of this indicates that there will be no significant negative effects on the special qualities of the AONB.

Land & Soils

SEA Directive Topics: Soil

Relevant SA Objectives:

- SA Objective No 14: Minimise the use of natural resources including soil and greenfield land, protect safeguarded mineral resources, and soil quality.

- 6.40 All development will take the soil resource with permanent negative effects. However, the Local Plan seeks to use previously developed land, wherever possible, and this contributes to mitigation. Policy CI3 seeks to protect allotment land with positive effects for natural resources and human health.

Equality Impact Assessment (EqIA)

- 6.41 Initial findings were subject to consultation from wider stakeholders during the Regulation 18 consultation February – March 2017 alongside the Draft Cheltenham Borough Local Plan (Part One Preferred Options, October 2016) Integrated (Sustainability) Appraisal Report. No comments were received on the EqIA.
- 6.42 The EqIA was updated to reflect the changes made to the plan since Regulation 18. Overall, the proposed policies in the Regulation 19 Cheltenham Plan help to confirm the compatibility with aims for equality by confirming the approach proposed in the Preferred Options Plan and confirming the likely positive effects. Policies on housing and employment land are confirmed; this includes Policy GT1 for gypsies and travellers with major positive effects for this distinct ethnic group. Policies HM1 & 2 recognise the particular needs for students and the elderly respectively – confirming positive effects.
- 6.43 The updated assessment has confirmed that the Cheltenham Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

Habitats Regulations Assessment (HRA)

- 6.44 The updated HRA Screening continues to conclude that the Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European sites. Some concerns were raised by the environmental regulator Natural England (NE) regarding no strategic understanding of where visitors come from and how they use the Cotswold Beechwoods SAC.

- 6.45 Since these concerns were raised by NE, the modifications to the JCS have been agreed and the JCS has been found sound (November 2017). The adopted JCS confirms that the JCS authorities are committed to working in partnership, including NE, to identify and agree any necessary appropriate mitigation plan to ensure delivery of strategic green infrastructure. Cheltenham Borough Council will continue to consider the implications of the Local Sites in the Cheltenham Plan and the need for any visitor surveys to inform the development of any local green infrastructure plan- and in line with ongoing JCS discussions.

7.0 PROPOSED MONITORING

Proposed Monitoring

- 7.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance⁵¹ on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication.
- 7.2 Government requires local planning authorities to produce Monitoring Reports (MRs), and the Cheltenham Borough Monitoring Report⁵² (produced annually) alongside the monitoring framework provided in the GCT JCS⁵³ is considered sufficient to ensure appropriate monitoring takes place going forward.

⁵¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁵² https://www.cheltenham.gov.uk/info/46/planning_policy/378/local_development_framework_evidence_base/5

⁵³ <https://jointcorestrategy.org/home>

8.0 SUMMARY CONCLUSIONS, CONSULTATION AND NEXT STEPS

Summary Conclusions

- 8.1 The representations to the Regulation 18 consultation (February – March 2017) have been taken into consideration in both the SA & HRA, and to inform the development of the Regulation 19 draft Cheltenham Plan. The changes made to the draft plan have been considered with regard to the implications of the previous findings of the SA; any significant changes have been subject to SA and the implications for the implementation of the plan as a whole have been assessed.
- 8.2 Minor changes have been made to site allocations for updating where sites now have planning permission, and to include other sites to ensure that the identified need for housing and employment is met. The reasons for selecting and rejecting site options remains valid as previously reported and updated in this report. The Regulation 19 Cheltenham Plan now includes development management Policies that support the Policies in the GCT JCS and provide guidance for development that recognises the special qualities and characteristics of the Cheltenham area. These policies strengthen and confirm positive effects and mitigation measures to address potential negative effects.
- 8.3 Overall, the SA found that the Cheltenham Plan is likely to have positive effects for SA objectives for housing, employment/economy, and communities, that are cumulative in the longer-term. There is the potential for negative effects on the highway network, landscape/townscape and the historic environment, but mitigation is provided through policies and the location of local allocations to minimise effects. The JCS includes mitigation measures and specific requirements for strategic level development – A6 North West Cheltenham & A11 West Cheltenham. Positive effects are indicated through policy on green space and green infrastructure that will have positive effects for both biodiversity and human health.
- 8.4 The Equality Impact Assessment (EqIA) found that the Cheltenham Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required. The Habitats Regulations Assessment (HRA) found that the Cheltenham Local Plan is considered unlikely to have significant effects on any European sites, alone or in-combination with other plans and projects.

Consultation & Next Steps

- 8.5 The Cheltenham Local Plan and its accompanying IA documents are provided for Regulation 19 consultation through the Council's website www.cheltenham.gov.uk during January to March 2018. Comments made will be taken into consideration in preparing the Submission Plan that will be submitted to the Secretary of State for independent examination later in 2018.

Glossary & Abbreviations

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| MR | Monitoring Report - Government requires local planning authorities to produce annual Monitoring Reports (MRs) relating to Local Plans. According to Government guidance, these need to include the findings of SA monitoring. |
| AONB | Area of Outstanding Natural Beauty. A landscape area of high natural beauty which has special status, and within which major development will not be permitted, unless there are exceptional circumstances. Designated under the 1949 National Parks and Access to Countryside Act. |
| Compatibility Analysis | The comparison of the vision and strategic objectives against the SA Framework. |
| Cumulative Effects | The effects that result from changes caused by a project, plan, programme or policy in association with other past, present or reasonably foreseeable future plans and actions. Cumulative effects are specifically noted in the SEA Directive in order to emphasise the need for broad and comprehensive information regarding the effects. |
| EqlA | Equality Impact Assessment - a process of analysing a proposed or existing service, strategy, policy or project. The aim is to identify any effect or likely effect on different groups within the community. The outcome is to make sure that, as far as possible, any negative consequences for minority groups are eliminated or minimised and opportunities for promoting equality are maximised. |
| Green Infrastructure | Green Infrastructure (GI) is a network of high quality green and blue spaces and other environmental features. It is designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities. Green Infrastructure includes parks, open spaces, playing fields, woodlands, wetlands, grasslands, river and canal corridors allotments and private gardens. |
| HIA | Health Impact Assessment - is a practical approach that determines how a proposal will affect people's health. Recommendations to 'increase the positive' and 'decrease the negative' aspects of the proposal are produced to inform decision-makers. |
| HRA | Habitats Regulations Assessment - The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). |
| Indicator | A means by which change in a system or to an objective can be measured. |
| LEP | Local Enterprise Partnership |
| Mitigation | Measures to avoid, reduce or offset the significant adverse effects of the plan on sustainability. |
| Monitoring | Activities undertaken after the decision is made to adopt the plan or programme to examine its implementation. For example, monitoring to examine whether the significant sustainability effects occur as predicted or to establish whether mitigation measures are implemented. |
| Objective | A statement of what is intended, specifying the desired direction of change. |
| SA | Sustainability Appraisal - A process by which the economic, social and environmental impacts of a project, strategy or plan are assessed. |
| SA Framework | The SA Framework provides the basis by which the sustainability effects of the emerging development planning document will be described, analysed and compared. It includes a number of sustainability objectives, elaborated by 'decision-aiding questions'. |
| Scoping | The process of deciding the scope and level of detail of the SEA. This also includes defining the environmental / sustainability effects and alternatives that need to be considered, the assessment methods to be used, the structure and contents of the |

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| | Environmental / Sustainability Report. |
| Screening | The process of deciding whether a plan or programme requires SEA or an Appropriate Assessment. |
| SEA | Strategic Environmental Assessment - systematic method of considering the likely effects on the environment of policies, plans and programmes. |
| SEA Directive | Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment". |
| SFRA | Strategic Flood Risk Assessment - Detailed and robust assessment of the extent and nature of the risk of flooding in an area and its implications for land use planning. Can set the criteria for the submission of planning applications in the future and for guiding subsequent development control decisions. SFRA's inform sustainability appraisal. |
| Sustainability Appraisal | A systematic assessment process designed to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of spatial development planning documents. |
| SSSI | Site of Special Scientific Interest - Areas of high quality habitat (or geological features) of regional, national or international nature conservation importance, designated by English Nature. |
| Target | A specified desired end, stated usually within a specified time-scale. |