



DRAFT GLOUCESTER CITY PLAN:

HABITATS REGULATIONS ASSESSMENT SCREENING REPORT

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enfusion



Gloucester City Council

Draft Gloucester City Plan:

Habitats Regulations Assessment Screening Report

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1.0 Introduction

The Plan & The HRA

- 1.1 Gloucester City Council (GCC) is preparing the Gloucester City Plan (GCP) to guide future development in the Local Authority area. The GCP will set out an overall strategy to guide development across the City in the period up to 2031. The GCP sets out how much new development (land for housing and employment) is needed, and where this development should take place, as well as providing information about the infrastructure (roads, schools, and open spaces) needed to support new development.
- 1.2 Enfusion has been commissioned to progress the Habitats Regulations¹ Assessment (HRA) of the Draft GCP on behalf of the Council in their role as the competent authority. HRA is a process that assesses the likely significant effects (individually and in combination) of proposed development on EU designated sites. At the same time, Enfusion is also undertaking the Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the Draft GCP; this work has been undertaken concurrently, with the two processes informing each other as appropriate.

Background

- 1.3 GCC, in partnership with Cheltenham Borough Council and Tewkesbury Borough Council, have produced a Joint Core Strategy² (JCS) which sets out the strategic planning framework for the delivery of development across the three local authority areas. The Gloucester, Cheltenham & Tewkesbury (GCT) JCS (plan period to 2031) sets out the housing and employment needs for the Gloucester City area, the strategic direction for development growth, and strategic policies to guide development. The GCP covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance³.
- 1.4 The GCT JCS identifies an overall level of growth across the three local authority areas of 35,175 new dwellings in the period up to 2031. 14,359 of these dwellings are identified to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS therefore identifies strategic allocations / urban extensions to meet the residual need.

¹ The Conservation of Habitats and Species Regulations 2010 (as amended). Online at: <http://www.legislation.gov.uk/uksi/2010/490/contents/made> [August 2016]

² Gloucester, Cheltenham & Tewkesbury Joint Core Strategy 2013. Online at <http://www.gct-jcs.org/> [August 2016]

³ National Planning Policy Framework (March 2012) Online at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [August 2016]

As the GCT JCS progresses through examination and proposed main modifications, more work is being undertaken to address the shortfall in meeting Gloucester's housing needs.

- 1.5 The GCP will allocate the remainder of the identified local sites (7,685 new dwellings) which will contribute to meeting the development needs of Gloucester. The GCP will also provide local planning policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031.

Consultation

- 1.6 The Habitats Regulations require the plan making/competent authority to consult the appropriate nature conservation statutory body. Due to the proximity to Wales and the potential of far reaching effects on European designations, both Natural England and Natural Resources Wales (NRW) will be consulted on this draft HRA Screening Report, as was the GCT JCS.
- 1.7 The Habitats Regulations leave consultation with other bodies and the public to the discretion of the plan making authority. In addition to the statutory consultation undertaken with the appropriate nature conservation body, this HRA Screening Report is available for wider public consultation alongside the Draft GCP.

Purpose & Structure of Report

- 1.8 This report documents the process and the findings of the HRA screening for the Draft GCP. Following this introductory section, the document is organised into a further three sections:
 - Section 2 summarises the requirements for HRA, the methods used, and the background to the Draft GCP.
 - Section 3 outlines the screening process and the findings of the screening assessment with technical details presented in the Appendices I-IV.
 - Section 4 summarises the findings of the HRA and explains the next steps.

2.0 Habitats Regulations Assessment & The Draft Plan

Requirements for Habitats Regulations Assessment

- 2.1 The Conservation of Habitats and Species Regulations 2010 (as amended) [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 conservation objectives of any site designated for its nature conservation importance.
- 2.2 The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive] which aims to protect habitats and species of European nature conservation importance. The 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) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In addition, Government guidance⁴ also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process as required by the Regulations.
- 2.3 The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the impacts of a land-use plan, when considered individually or in combination with the effects of other plans and projects against the conservation objectives of a European Site, would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

Guidance & Good Practice

- 2.4 The application of HRA to Local Plans has been informed by a number of key guidance and practice documents. Guidance for HRA was published by the Government⁵ based on the European Commission's (2001) guidance for the Appropriate Assessment (AA) of Plans. The Government's guidance recommends three main stages to the HRA process:
- **Stage 1:** Screening for Likely Significant Effect
 - **Stage 2:** Appropriate Assessment, Ascertaining Effects on Integrity
 - **Stage 3:** Mitigations Measures and Alternatives Assessment.

⁴ DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas- Core guidance for developers, regulators & land/marine managers

⁵ DCLG, 2006, Planning for the Protection of European Sites: Appropriate Assessment

- 2.5 If alternative solutions or avoidance/ mitigation measures to remove adverse effects on site integrity cannot be delivered, then current guidance recommends an additional stage to consider Imperative Reasons of Overriding Public Interest (IROPI) for why the plan should proceed. For the HRA of land use plans, IROPI is only likely to be justified in a very limited set of circumstances and must be accompanied by agreed, deliverable compensation measures for the habitats and species affected. Since the HRA of the JCS did not identify any potential residual adverse effects, this additional stage is not needed for this lower level local plan and is not considered any further in this report.
- 2.6 More recently, the nature conservation regulator Natural England has produced additional, detailed guidance⁶ on the HRA of Local Development Documents that complements the DCLG guidance, and builds on assessment experience and relevant court rulings. In 2012 DEFRA published a Core Guidance⁷ document relating to the Habitats & Wild Birds Directive, providing information on decision making and the HRA process for developers, regulators and land/marine managers.

Method

- 2.7 The approach taken for the HRA of the Draft GCP follows the method set out in the formal guidance documents. The key stages of the HRA process and the specific tasks undertaken for each stage are set out in Table 2.1.

Table 2.1: HRA Key Stages:

Stages	Habitats Regulations Assessment
Stage 1: Screening for Likely Significant Effects	1. Identify European sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the European site(s) potentially affected.
	3. Analyse the policy/ plan and the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects on European sites (magnitude, duration, and location) based on best available information.
	4. Examine other plans and programmes that could contribute (cumulatively) to identified impacts/ effects.
	5. Produce screening assessment based on evidence gathered and consult statutory nature conservation body on findings.
	6. If effects are judged likely or uncertainty exists – the precautionary principle applies proceed to Stage 2.
Stage 2: Appropriate Assessment	1. Agree scope and method of Appropriate Assessment with statutory nature conservation body.
	2. Collate all relevant information and evaluate potential impacts on site(s) in light of conservation objectives.
Stage 3:	1. Consider how effect on integrity of site(s) could be avoided by changes to plan and the consideration of alternatives (e.g. an

⁶ Tyldesley, D., 2009, The Habitats Regulations Assessment of Local Development Documents (Natural England)

⁷ DEFRA, 2012. The Habitats and Wild Birds Directives in England and its seas- Core guidance for developers, regulators & land/marine managers

Stages	Habitats Regulations Assessment
Mitigation Measures and Alternatives Assessment	alternative policy/ spatial location). Develop mitigation measures (including timescale and mechanisms for delivery).
	2. Prepare HRA/ AA report and consult statutory body.
	3. Finalise HRA/AA report in line with statutory advice to accompany plan for wider consultation.

The Draft Gloucester City Plan

Aims & Principles

- 2.8 The Gloucester City Plan has an identified Vision and strategic Principles to help deliver this Vision. These are as follows:

Vision:

"Between 2016 and 2031 the City Council, together with its partners, stakeholders and the community will work together in positively delivering the Joint Core Strategy and Gloucester City Plan.

During this time significant progress will have been made in the regeneration of the City Centre and elsewhere within the City. Gloucester will be a flourishing, healthy, modern and ambitious City, where people feel safe and happy in their community and are proud to live and work.

Gloucester will grow as an economy and make a significant contribution to the wider economy of Gloucestershire, building on its strengths as a business location. The City Council will work with partners and neighbouring authorities to ensure that the economic development required beyond its boundary benefits Gloucester, while at the same time, supporting business growth and expansion within the City itself.

A significant number of new decent homes will have been delivered in a way that reflects the type and tenure needed by the local community and that supports economic growth.

Health and wellbeing will be a key consideration in all planning decisions ensuring the protection and provision of active streets, open spaces, playing fields, community infrastructure, environmental quality, connectivity and access.

New development will be built to the highest possible standard of design and will be focused on protecting the quality and local distinctiveness of the City.

Gloucester's unique heritage, culture, and natural environment will be safeguarded and enhanced to create a highly attractive place that all residents and visitors can enjoy."

Principles:

1. To ensure development contributes to the delivery of a transforming City which brings regeneration benefits, promotes sustainable development and makes the most efficient use of brownfield land and buildings
2. To ensure that new development is supported by the necessary infrastructure
3. To regenerate the City Centre and other areas of the City in accordance with the Council's adopted strategies and maximise benefits associated with Housing Zone status
4. To develop a City Centre that provides for the needs of the 21 st Century, with increased choice, an improved environment and to protect it from inappropriate competition in other locations
5. To provide a balanced network of local and district centres that provide for the everyday shops, services and facilities needed by the local community.
6. To provide a balanced mix of new homes that provide for the needs and aspirations of the local community, working with neighbouring authorities where they are providing for housing needs of the Gloucester community.
7. To encourage and facilitate inward and home grown investment, attracting innovative growth sectors, create high and stable levels of economic growth and increases job opportunities.
8. To improve educational attainment, skills and learning opportunities.
9. To protect and enhance the City's leisure, recreation and environmental assets, including valuable heritage, public open space, allotments, areas of nature conservation, sensitive landscapes, playing fields and sporting facilities.
10. To encourage a vibrant and safe evening and night-time economy in the City Centre that appeals to all age groups and encourages more people to stay overnight.
11. To tackle poverty and deprivation in the worst affected areas of the City.
12. To deliver development that achieves high quality design that reduces crime and the fear of crime, builds positively on local distinctiveness and contributes to the creation of an active, connected and sustainable City.
13. To ensure that development minimises its impact on climate change through sustainable construction and design, encourages the use of sustainable forms of transport and integrates with and makes the most of existing infrastructure.
14. To improve health and wellbeing through good design that promotes opportunities for all residents to lead 'activity lives', by providing access to good quality open spaces, playing fields and community facilities, and protecting air quality and residents from pollution and contamination.

Level and Distribution of Growth

- 2.8 The overall level of proposed growth in Gloucester is identified within the GCT JCS. As detailed in paragraph 1.4 Gloucester cannot currently meet its housing needs within its administrative boundaries. The GCP proposes the

allocation of 7,685 new dwellings through identified local sites. The GCT JCS (and through ongoing work) identifies strategic allocations / urban extensions to meet the residual need. Much of this growth is directed towards the housing regeneration zones (Greater Blackfriars and the Railway Corridor) and within the central area. The GCP also provides planning policies that will, alongside the GCT JCS, be used to guide and manage development over the plan period to 2031.

Site Allocations & Local Policies

2.9 The Draft GCP proposes 25 site allocations for new housing and employment development and 69 local policies to guide and manage development. The policies cover a range of topics including:

- Historic Environment
- Health & Wellbeing
- Flooding & Water Management
- Design
- Climate Change
- Natural Environment
- Retail & City/Town Centres
- Housing
- Economy & Employment

3.0 Screening

The JCS HRA (2013)

- 3.1 The GCT JCS (2013) has set the overall level of growth and a HRA was undertaken during its preparation. The HRA screening of the JCS found that for 12 of the 13 identified European sites there would be no significant effects, although there was some uncertainty regarding the in combination effects on 7 European sites as a result of changes to Air Quality, Disturbance and Water Levels & Quality. There was also uncertainty around the significant impacts that short range atmospheric pollution might have on the Cotswolds Beechwoods SAC. Therefore, an AA was undertaken to gain a more detailed understanding of the possible significant impacts which may occur.
- 3.2 The AA made a number of recommendations to ensure potential impacts on European sites did not occur, including conducting a transport assessment and a water cycle study, and strengthening the flooding policy. Overall the HRA concluded that with consideration to the recommendations provided, the Draft JCS would not have significant alone or in combination effects on the integrity of the identified European sites. There was some uncertainty raised during consultation and examination by Natural England regarding the potential recreational impacts on the Cotswolds Beechwoods SAC and proposed mitigation measures. However, this has now been resolved through a HRA Addendum Report⁸ (May 2015) and a subsequent Memorandum of Understanding between the JCS authorities and Natural England. No further concerns on the HRA have been raised during examination of the JCS and therefore, it can be concluded that the strategic development proposed for Gloucester in the JCS will not have adverse effects on the identified European sites.

Screening the Draft GCP 2016

- 3.3 Many of the European sites that were scoped into the HRA for the JCS are also applicable for consideration in the HRA of the Draft GCP. However, the Bredon Hill, Lyppard Grange Ponds, River Usk, River Wye, Wye Valley Woodlands and Dixton Wood European sites have not been included in this HRA given their distance of over 15km from the City. The European sites which have been included in this HRA for the Draft GCP are listed below:

- Cotswold Beechwoods SAC
- Rodborough Common SAC
- Severn Estuary SAC
- Wye Valley and Forest of Dean Bat Sites SAC
- Severn Estuary SPA

⁸ <http://www.gct-jcs.org/Documents/Examination-Documents/Examination-Documents/SAPR119A-HRA-Addendum-Cotswold-Beechwoods.pdf>

- Walmore Common SPA
- Severn Estuary Ramsar

Characterisation of European Sites

- 3.4 A general overview of the European sites scoped into the assessment is provided below in Table 3.1. More detailed characterisations including conservation objectives and the specific vulnerabilities for each site are provided in Appendix I.

Table 3.1: Summary of European Site Characterisations

Cotswolds Beechwoods SAC
The Cotswolds Beechwoods SAC is the most westerly block of <i>Asperulo-Fagetum</i> beech forests in the UK. The woods are structurally varied with blocks of high forest and areas of remnant Beech Coppice. The area is designated as a SAC due to the presence of both <i>Asperulo-Fagetum</i> Beech forests and semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>). The site has a number of vulnerabilities including recreational activities and invasive non-native species.
Rodborough Common SAC
Rodborough Common is the most extensive area of semi-natural dry grassland in the Cotswolds, and represents CG5 <i>Bromus erectus – Brachypodium pinnatum</i> grassland. The area is a designated SAC due to the presence of semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) on the site. The site has a number of vulnerabilities including recreational activities and grazing activities.
Severn Estuary SPA/SAC/Ramsar
The Severn estuary SPA/SAC/Ramsar is the largest coastal plain estuary in the UK with extensive mudflats and sandflats, rocky shore platforms, shingle and islands. Saltmarsh fringes the coast, backed by grazing marsh with freshwater and occasional brackish ditches. The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have the second highest tidal range in the world (after the Bay of Fundy in Canada) at more than 12 meters. This tidal regime results in plant and animal communities typical of the extreme physical conditions of strong flows, mobile sediments, changing salinity, high turbidity and heavy scouring. The resultant low diversity invertebrate communities, that frequently include populations of ragworms, lugworms and other invertebrates in high densities, form an important food source for passage and wintering birds. The site is important in the spring and autumn migration periods for waders moving along the west coast of Europe, as well as in winter for large numbers of waterbirds including swans, geese, ducks and waders. These bird populations are regarded as internationally important. The Severn estuary SPA/SAC/Ramsar has a number of vulnerabilities including changes in abiotic conditions, changes in hydraulic conditions and industrial activities.
Wye Valley & Forest of Dean Bat Sites SAC
The Wye Valley and Forest of Dean Bats SAC straddles the Wales-England border and covers an area of 142.7ha. The SAC contains by far the greatest concentration of lesser horseshoe bat <i>Rhinolophus hipposideros</i> in the UK, totalling about 26% of the national population. The site also supports the greater horseshoe bat <i>Rhinolophus ferrumequinum</i> in the northern part of its range, with about 6% of

the UK population. The site has a number of vulnerabilities including recreational activities and ecosystem modifications.

Walmore Common SPA

Walmore Common is located 10km South-West of Gloucester. The site is a wetland overlying peat providing a variety of habitats including improved neutral grassland, unimproved marshy grassland and open water ditches. The site is an important location for of Bewick's Swan *Cygnus columbianus bewickii*. The site has a number of vulnerabilities including recreational activities and changes in biotic conditions.

Other Plans and Programmes

- 3.5 A review of other plans and programmes in and around the Gloucester plan area was conducted to consider the potential for significant in-combination effects. The review found that a number of existing plans could have a variety of in-combination effects with the Draft GCP. These potential significant effects include impacts on air pollution through increased traffic; increased levels of disturbance through recreational activities, and noise and light pollution; increased levels of water abstraction and impacts on water quality through increased wastewater discharge.

The Effects of The Plan

- 3.6 As detailed in paragraph 2.9 the Draft GCP proposes a number of local sites for development and a number of policies to guide development. Housing, employment and infrastructure development has the potential to generate a range of environmental effects that could have impacts on European sites.
- 3.7 The first stage in the screening process considered the likely significant effects (LSEs) arising from implementation of the policies and proposed local sites - and whether these have the potential to lead to potential impacts. The screening identified that two Draft GCP Policies (climate change & employment land allocations) and 18 site allocations for which the LSEs could potentially lead to impacts (detailed in this HRA Report Appendix III) alone or in-combination with each other – as follows in Table 3.2 below.

Table 3.2: Draft GCP Policies and Site Allocations Identified for LSE

Climate Change: F8 Potential of River and Canal
Economy & Employment: B3 New Employment Sites
Site Ref: 2, Site Name: Quayside & Barbican (part of Greater Blackfriars) (Site Allocation SA02)
Site Ref: 3, Site Name: Gloucester Prison (part of Greater Blackfriars) (Site Allocation SA02)
Site Ref: 4, Site Name: Ladybellgate Street Car Park (part of Greater Blackfriars) (Site Allocation SA02)
Site Ref: 7, Site Name: Southgate Moorings (Site Allocation SA03)
Site Ref: 10, Site Name: Land at 'The Wheatridge' (Site Allocation SA05)
Site Ref: 13, Site Name: Former Civil Service Club (Site Allocation SA08)
Site Ref: 18, Site Name: Former Bishops College (Site Allocation SA13)
Site Ref: 20, Site Name: Land East of Waterwells (Site Allocation SA27)
Site Ref: 21, Site Name: Land at Clearwater Drive (Site Allocation SA15)
Site Ref: 23, Site Name: Spinnaker Park, Spinnaker Road (Site Allocation SA17)
Site Ref: 25, Site Name: Land at Rea Lane, Hempsted (Site Allocation SA19)
Site Ref: 28, Site Name: Land adjacent to St Oswalds Retail Park (Site Allocation SA22)
Site Ref: 29, Site Name: Allstones, Myers Road (Site Allocation SA23)
Site Ref: 30, Site Name: Barnwood Manor, Barnwood Road (Site Allocation SA24)
Site Ref: 32, Site Name: Holly House, Barnwood (Removed as a Site Allocation)
Site Ref: 33, Site Name: Fieldview House, Barnwood/Abby (Removed as a Site Allocation)
Site Ref: 39, Site Name: Land East of Hempsted Lane (Site Allocation A)
Site Ref: 40, Site Name: MOD Site, Hempsted (Site Allocation B)
Site Ref: 41, Site Name: Former Contract Chemicals (Site Allocation C)
Site Ref: 44, Site Name: Land adjacent to Wall's Factory (Site Allocation D)

3.8 A summary of the types of effects and impacts that can arise from housing and employment development is provided in Table 3.3 below.

Table 3.3: Housing, Employment and Infrastructure Development - Possible Effects & Impacts on European Sites

Effects on European Sites	Impact Types
Habitat (& species) fragmentation and loss	Direct land take, removal of green/ connecting corridors/ supporting habitat, changes to sediment patterns (rivers and coastal locations) Introduction of invasive species (predation)
Disturbance	Increased recreational activity (population increase)

Effects on European Sites	Impact Types
	Noise and light pollution (from development and increased traffic)
Changes to hydrological regime/ water levels	Increased abstraction levels (new housing) Increased hard standing non-permeable surfaces/ accelerated run-off Laying pipes/ cables (surface & ground) Topography alteration
Changes to water quality	Increase in run-off/ pollutants from non-permeable surfaces (roads, built areas) Increased air pollution (eutrophication) (traffic, housing) Increased volume of discharges (consented)
Changes in air quality	Increased traffic movements Increased emissions from buildings

- 3.9 The potential impacts were then screened against each of the European sites scoped into the HRA (Appendix IV). This included consideration of the environmental pathways and sensitivities of the sites, as well as mitigation measures provided by the Draft GCP Policies and the JCS strategic policies. Appendix III and IV detail the results of the HRA screening process for the Draft GCP; the key findings are summarised below.

Screening Assessment

- 3.10 HRA screening good practice combines both a plan and a European site focus. The policy screening removes from consideration those elements of the plan unlikely to have effects on European sites. The remaining plan elements (summarised above) can then be considered in more detail for their impacts on European sites. The site focus considers the impacts and potential effects identified through the policy screening, in the light of the environmental conditions necessary to maintain site integrity for the European sites scoped into the assessment.

Air Quality

- 3.11 For 6 out of the 7 identified European Sites assessed, it was found that there was no risk of significant effects occurring either alone or in-combination through increased levels of short range and diffuse atmospheric pollutions caused as a result of the Draft GCP. This was either because there were no existing environmental pathways or that the European site was not vulnerable to atmospheric pollutants and critical loads were not being exceeded. The Draft GCP has a number of policies designed to protect air quality and minimise the impacts of increased atmospheric pollution and traffic:

- Design: G6- Cycle Parking & Storage- This policy encourages uses of cycling (sustainable transport) by ensuring developments have space for cycle storage.
- Design: G14- Transport Arrival Nodes- This policy encourages the regeneration key public transport nodes which should help reduce traffic by encouraging use of sustainable public transport methods.
- Natural Environment: F5- Green Infrastructure (GI)- This policy aims to protect and enhance Green Infrastructure assets.
- Health & Wellbeing: Policy D1- Active Design- This policy ensures walking and cycling are encouraged through design.
- Health & Wellbeing: Policy D10-Air Quality- The policy ensures developments do not contribute to increased air pollution and design should reduce exposure to pollutants.
- Health & Wellbeing: Policy D12-Pollution- The policy prevents development which will cause pollution that will have a negative effect on the environment.
- Sustainable Transport: Policy H1- The policy encourages new development to provide cycle parking and storage.
- Sustainable Transport: Policy H1- The policy encourages improvement to the sustainable transport network.
- Natural Environment: F1- Landscape- The policy aims to protect vulnerable and protected landscapes from negative effects of development.

The GCT JCS also provides strong guidance through strategic policies to mitigate potential effects on European Sites. Relevant JCS policies that will provide mitigation against Air Quality effects are listed below.

- Policy C6 - requires new development to contribute to a healthier urban environment through maintaining or improving air quality.
- Policy S3 - requires all development to achieve high standards / levels under BREEAM or Code For Sustainable Homes. These set minimum standards for CO2 and credits can be earned by incorporating measures to reduce pollution, if the developer chooses to do so.
- Policy S4 – requires that new development should be designed to prioritise movement by sustainable transport modes and encourage.
- Policy S10 – development is required to protect and enhance Green Infrastructure (GI) assets.
- Policy C7 – requires all proposals to include provision of transportation measures including opportunities for installation or retrospective installation of new transport technologies such as electric car plug-in and ultra-low emission vehicle fuelling.
- Policy D2 – this requires that all major development sites including urban extensions and strategic allocations, need to be accompanied by a transport, a dust and a GI assessment.
- Policy D3 – requires that the exacerbation of atmospheric pollution will need to be assessed in a transport assessment and any impacts identified will be mitigated either directly or through financial contributions.

- 3.12 The screening identified that Walmore Common SPA was at potential risk of impacts from short range atmospheric pollution due to the close proximity of the A48 which runs within 200 metres of the site and the potential increase in traffic along this road caused by future development. However, an increase in the level of activity on the A48 as a result of the GCP is unlikely to be significant due to the proposed local scale of development. It is considered that the mitigation provided through the draft policies should be sufficient to ensure that there are no significant impacts on Walmore Common caused by short range atmospheric pollution. The overall level of growth has already been assessed through the GCT JCS and is considered unlikely to lead to any significant negative effects given the policy mitigation in place.
- 3.13 It is therefore determined that there will be no adverse effects – either alone or in combination- on any of the European sites with regard to short range and diffuse atmospheric pollution. Mitigation provided through the GCT JCS and Draft GCP policies is comprehensive and detailed enough to ensure the protection of European sites from significant impacts. The policies encourage the use and development of sustainable transport methods as well as the protection of air quality and vulnerable landscapes from negative effects caused by development.

Disturbance

- 3.14 The screening found that whilst all of the European sites are located outside of the Plan area they are vulnerable to disturbance impacts. Due to this vulnerability every site was considered at risk from disturbance activities with further details provided in Appendix IV. The Draft GCP has a number of policies which can mitigate disturbance at European Sites:
- Health & Wellbeing: Policy CPXX-Outdoor Space- The policy aims to ensure amenity and garden space is retained, ensuring people will not need to go to the SAC for recreational use if there are spaces for recreation in the city boundary.
 - Health & Wellbeing: Policy CPXX-Open Space- The policy ensures large employment and residential developments will need to provide an appropriate amount of open public space.
 - Health & Wellbeing: Policy CPXX- Provision of Playing Pitches in New Development- The policy will ensure that development residents sporting needs are met, ensuring recreational space will be provided.
 - Health & Wellbeing: Policy CPXX- Protection of Open Space and Playing Fields- The policy ensure that the loss of open space and playing fields is prevented.
 - Natural Environment: CPXX- Green Infrastructure (GI)- This policy aims to protect and enhance Green Infrastructure assets.

- Natural Environment: CPXX- Landscape- The policy aims to protect vulnerable and protected landscapes from negative effects of development.
- Health & Wellbeing: Policy CPXX-Pollution- The policy prevents development which will cause pollution (including light pollution) that will have a negative effect on the environment.
- Health & Wellbeing: Policy CPXX-Noise- The policy states that unacceptable noise levels next to noise sensitive zones will not be permitted.
- Natural Environment: CPXX- Biodiversity- The policy will protect biodiversity from possible harm caused by development.

The GCT JCS also provides strong guidance through strategic policies to mitigate potential impacts on European Sites. Relevant JCS policies that will provide mitigation against disturbance effects are listed below.

- Policy C6 - Supporting Healthy Lifestyles and Wellbeing. The Policy requires new development to contribute to a healthier urban environment through minimizing disturbance associated with light, noise and odour. It also requires that new development delivers public open space that is safe, encourages active use and maximizes opportunities for informal recreation.
- Policy S3 - requires all development to achieve high standards / levels under BREEAM or Code For Sustainable Homes. These set minimum standards for CO2 and credits can be earned by incorporating measures to reduce pollution, if the developer chooses to do so.
- Policy S4 – requires that new development should provide and/or link into Green Space.
- Policy S10 – development is required to protect and enhance Green Infrastructure (GI) assets.
- Policy D2 – this requires that all major development sites including urban extensions and strategic allocations, need to be accompanied by a noise, a dust and a GI assessment.
- Policy D3 – requires that the exacerbation of noise pollution will need to be assessed in a transport assessment and any impacts identified will be mitigated either directly or through financial contributions.

3.15 Both Cotswolds Beechwoods SAC and Walmore Common SPA were identified as being the closest sites to the Plan Area. The Cotswolds Beechwoods SAC site is located only 2.4km from the Plan area and the Walmore Common SPA is 4km from the Plan area. Both sites are known to be vulnerable to disturbance. Through the screening it was found that the policies in the GCP Draft should prevent significant impacts occurring. These policies include the creation of open spaces in the plan boundary for recreational use and the protection of playing fields from any potential loss. The policies also ensure noise and light pollution is restricted especially when near sensitive zones such as a European designation. In this case the scale of development and location of proposed sites can also be taken into

consideration. Many of the proposed sites are not close enough to European sites to be a risk of having significant effects, the closest site allocations are also small scale development sites.

- 3.16 As a result of policy mitigation, the location of European sites in regard to the Plan Area, and the local scale of the proposed development sites, the screening has found that none of the European sites will be subject to significant alone or in combination effects caused by disturbance.

Water Levels and Quality

- 3.17 The screening found that for 3 out of the 7 European Sites there was no risk of significant effects occurring from changes in water levels or water quality as these sites are not considered to be vulnerable to changes in hydraulic conditions. The Draft GCP has a number of policies designed to protect water quality and maintain water levels:
- Flooding and Water Management: F7- The policy aims to prevent flooding from occurring and effective and sustainable management of water resources.
 - Design: G16 - Design & Climate Change- The policy states that development should have a high level of environmental awareness and contributes to climate change mitigation and prevention.
 - Natural Environment: F1 - Landscape- The policy aims to protect vulnerable and protected landscapes from negative effects of development.
 - Health & Wellbeing: Policy D12 – Pollution - The policy prevents development which will cause pollution (including water pollution) that will have a negative effect on the environment.
 - Health & Wellbeing: Policy D13 – Contamination - This policy is aimed to prevent contamination of groundwater.
- 3.18 The GCT JCS also provides strong guidance through strategic policies to mitigate potential effects on European Sites. Relevant JCS policies that will provide mitigation against disturbance effects are listed below.
- Policy S3 requires all development to achieve high standards / levels under BREEAM or Code For Sustainable Homes. These set minimum standards for water use and efficiency and credits can be earned by incorporating measures to reduce pollution, if the developer chooses to do so. This should reduce water abstraction and could reduce pollution.
 - Policy S10 requires development to protect and enhance Green Infrastructure assets which could help intercept pollutants and improve water quality.
- 3.19 Both Walmore Common SPA and the River Severn Ramsar/SAC/SPA sites were noted as being at risk to potential impacts due to their particular

vulnerabilities to changes in hydraulic conditions. The screening process showed that there were no environmental pathways which would lead to significant effects on water quality and level for Walmore Common SPA. For the River Severn Ramsar/SAC/SPA there are possible environmental pathways through the streams and rivers which flow into the River Severn from Gloucester. However, mitigation provided through policies in the Draft GCP was found to be sufficient to ensure no impacts would occur. The policies include effective and sustainable management of water resources, the prevention of pollution (including water pollution) and contamination of groundwater, and the protection of vulnerable landscapes, including European sites.

- 3.20 The screening found that overall none of the European sites should be subject to significant effects either alone or in combination as a result of changes in water quality and water levels. The Draft policies, alongside the GCT JCS policies, provide comprehensive and sufficient mitigation to ensure that the sites are protected from any effects caused by developments within the Plan Area.
- 3.21 Table 3.5 summarises the potential impacts arising from the Draft GCP policies and site allocations (Appendix III) against the identified European sites (Appendix IV), considering the mitigation outlined above to determine if there is the potential for likely significant effects. Table 3.4 provides the key to Table 3.5 to describe the results of the assessment.

Table 3.4- Screening Summary Key

Likely Significant Effect	Yes	Appropriate Assessment required
No Likely Significant Effect	No	No further assessment required
Significant Effect Uncertain	?	Uncertain, precautionary approach taken and Appropriate Assessment required

Table 3.5 – HRA Screening Summary

	Potential Likely Significant Effects		
	Air Quality	Disturbance	Water Levels & Quality
European sites			

	A⁹	IC¹⁰	A	IC	A	IC
Cotswold Beechwoods SAC	No	No	No	No	No	No
Rodborough Common SAC	No	No	No	No	No	No
Severn Estuary SAC/ SPA/ Ramsar	No	No	No	No	No	No
Walmore Common SPA	No	No	No	No	No	No
Wye Valley and Forest of Dean Bat Sites SAC	No	No	No	No	No	No

⁹ AA required alone?

¹⁰ AA required in combination?

4.0 HRA Summary, Conclusions & Next Steps

Summary

- 4.1 This report presents the methods used and the findings arising from the HRA Screening of the Draft GCP. The HRA has been undertaken in accordance with extant guidance and good practice and has been informed by the previous HRA work on the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.
- 4.2 The Draft GCP will, alongside the GCT JCS, deliver new housing and employment development to meet the identified needs of the resident populations, and deliver policies to guide and manage future growth over the plan period to 2031. The GCP covers the administrative area of Gloucester City and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance.
- 4.3 The GCT JCS identifies that 14,359 new dwellings are required to meet the needs of the Gloucester City area. Gloucester City is unable to fully meet its identified needs within the existing administrative boundary, with an identified local urban capacity for 7,685 new dwellings. The GCT JCS (including through ongoing work) identifies strategic allocations / urban extensions to meet the residual need. The GCP will allocate the remainder of the identified local sites (7,685 new dwellings).
- 4.3 The screening identified two Draft GCP policies and 18 site allocations for which the impacts could potentially lead to significant effects either alone, or in combination with other plans and programmes. The two policies and 18 site allocations with their potential effects were then screened against each of the 7 European sites scoped into the HRA. This included consideration of the environmental pathways and sensitivities of the sites, as well as mitigation provided by Draft GCP and the GCT JCS.

Conclusion

- 4.4 The screening found that none of the European sites identified will be impacted by significant alone or in combination effects from atmospheric pollution, disturbance or changes in water levels and quality potentially arising from implementation of the Draft GCP. Although some sites were at risk to potential effects, policy mitigation provided through the Draft GCP and GCT JCS was comprehensive enough to ensure that the European sites will not be adversely affected. Therefore, no further Appropriate Assessment is required to be undertaken for this HRA.

Consultation and Next Steps

- 4.5 These findings will be subject to further consultation comments and advice from the relevant regulator, Natural England. HRA is an iterative process and

further work will be undertaken alongside the Gloucester City Plan to inform its development.

- 4.6 The findings of this plan level HRA do not obviate the need to undertake HRA for lower level, project scale/ implementation plans where there is potential for significant effect on one or more European sites. The findings of this HRA should be used to inform any future assessment work.