



Cotswold Canals Brimscombe Area Action Plan: Sustainability Appraisal

Stroud District Council

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1	Introduction	4
	Sustainability Appraisal and Strategic Environmental Assessment	4
2	Options	6
3	Assessment Tables	7
	Option 1	12
	Option 2	12
	Option 3	13
	Option 4	14
	Option 5	15
4	Conclusions	17

1 Introduction

- 1.1 Sustainability appraisal is a systematic and iterative process, incorporating the requirements of the Strategic Environmental Assessment Directive (footnote: European Union Directive 2001/42/EC). In carrying out the appraisal, local planning authorities should have regard to the specific objectives and principles of sustainable development as outlined in PPS 1. The potential direct, indirect and cumulative impacts of different policy options need to be identified and appraised in order to integrate sustainable development objectives in the formulation of policy and to inform decisions on which options should be promoted in local development documents.
- 1.2 Following SA Guidance and the advice on PPS 12, the relevant SA commentary on the likely significant effects of the options should be available at the same time as the options themselves, in an informal pre-submission consultation stage.
- 1.3 The Guidance suggests possible methods of public involvement and also recommends that the work should be published on the Local Authority's website.
- 1.4 This report examines the likely significant sustainability effects of the options being considered for the Brimscombe Area Action Plan.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.5 SEA is required by European and by English law. It involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The aim of the SEA Directive is "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development".
- 1.6 The Directive was transposed into English legislation by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations'), which came into force on 21st July 2004. The SEA Regulations apply (with some specific exceptions) to plans and programmes subject to preparation and / or adoption by a national, regional or local authority or those prepared by an authority for adoption through a legislative procedure by Parliament or Government and are required by legislative, regulatory or administrative provisions.



- 1.7 SA extends the concept of SEA to encompass economic and social concerns. The Planning and Compulsory Purchase Act 2004 (PCPA) requires Local Planning Authorities to undertake SA for each of their Local Development Documents (LDDs), including the Core Strategy. SA is therefore a statutory requirement for LDDs along with SEA.
- 1.8 The Government’s approach is to incorporate the requirements of the SEA Directive into a wider SA process that considers economic and social, as well as environmental effects. To this end, in November 2005, the Government published guidance on undertaking SA of LDDs that incorporates the requirements of the SEA Directive (‘the Guidance’). The combined SA / SEA process is referred to in this document as Sustainability Appraisal (SA).
- 1.9 The Guidance advocates a five-stage approach to undertaking SA (see figure 1.1).

Figure 1.1 Five-stage approach to SA



- 1.10 Stage A involves gathering an evidence base and defining SA Objectives. The findings of this stage are documented in a Scoping Report. The appraisal is conducted at Stage B and outcome recorded in the Preferred Options SA Report during Stage C. Following statutory consultation (Stage D) the SA Report may require updating to reflect changes made in response to representations. Stage E concerns ongoing monitoring of significant effects.
- 1.11 This report represents the first phase of the appraisal, or Stage B.

2 Options

- Option 1 'do nothing' approach
- Option 2 'heritage focused' mixed use approach (100% of historic water extent)
- Option 3 'employment influenced' mixed use approach
 - A 100% of historic water extent
 - B 70% of historic water extent
 - C 40% of historic water extent
 - D 15% of historic water extent
- Option 4 'housing led' mixed use approach
 - A 100% of historic water extent
 - B 70% of historic water extent
 - C 40% of historic water extent
 - D 15% of historic water extent
- Option 5 'retail and leisure influenced' mixed use approach
 - A 100% of historic water extent
 - B 70% of historic water extent
 - C 40% of historic water extent
 - D 15% of historic water extent



3 Assessment Tables

- 3.1** The following process was used to judge whether an effect was likely to be significant or not.
- 3.2** For each of the land use types the Scoping report and Stroud District Local Plan were used to pick out key messages. Targets for the provision of land uses were taken from these documents. The targets identified were as follows:

Table 3.1 Table 1 - Targets from Policies/Plans

Land Use	Messages from the Scoping Report and the Stroud District Local Plan	
Housing	Stroud District is allocated a target of 6,750 dwellings between 2001-2016 A target of 30% of new household units on appropriate developments should be affordable	Gloucestershire Structural Plan – Third Alteration (unadopted) Stroud District Council IPS Affordable Housing Provision in Association with New Residential Development
Employment (B1, B2 and B8 uses)	Employment Land Supply at 1st April 2004 Structural Plan Requirements: about 100 ha Land developed 01/01/91 to 31/03/04 : 35.16 ha Commitments at 01/04/04 (planning consents): 36.18 ha Shortfall: 28.66 ha Losses to 31/03/04: 20.43 ha Total shortfall about 49.09	Stroud District Local Plan
Retail/Leisure/Food and Drink	No appropriate policy / target found.	Stroud District Local Plan
Community Uses	Proposals for new residential development should provide appropriate public outdoor playing space in accordance with the adopted standards of	Stroud District Local Plan

Land Use	Messages from the Scoping Report and the Stroud District Local Plan	
	2.4 hectares per 1,000 population	

3.3 A judgment was made as to what % achievement of these targets, which would need to be delivered for the effect to be considered to be significant. It was considered that the delivery of 5% of the target in question would be considered to be significant. For unemployment a target for reducing the number of economically active unemployed in the district was not found. In the absence of this a 5% reduction in the absolute number of unemployed was used. It should be noted that the methodology adopted to judge significance for employment land and job provision was modified slightly to take into account the existing provision on the site under its current use that would be lost following redevelopment.

Table 3.2 Table 2 - Judgement on significance

Land Use		Significance Measure
Housing	Average target of 422 dwellings per year. Achieving 5% of this target is judged to be significant. This equates to the provision of 106 dwellings on the site (it is assumed that the residential units will be built over a 5 year period)	Provision of 106 dwellings
Employment (B1, B2 and B8 uses)	100 ha of new provision required. Achieving 5% of this is judged to be significant. The number of jobs provided by the proposed site mix will also be considered. The current number of Economically active unemployed people in Stroud District is 1,843 (2001 census).	Provision of 7.75 ha of employment land (This takes account of the provision of 2.75ha by the current use of the site which will be lost) Providing 416 jobs (This takes account of the provision of 324 jobs by the current use of the site which will be lost)



Land Use		Significance Measure
	Providing new jobs equal to 5% of this figure is considered to be significant.	
Retail/Leisure/Food and Drink	No targets were found for this land use in a format that could be used for this exercise.	
Community Uses	Due to the phrasing of the options it is not possible to calculate the provision of open space under each of the options.	

3.4 The sustainability effects of these options are documented in Table 1, above, by cross-indexing them with the SA Objectives. If an Option is incompatible with an SA Objective, a cross ('X') is used to highlight this. A question mark ('?') indicates a potential incompatibility. A tick ('✓') denotes that the option is likely to contribute to the achievement of the SA Objective. Where no symbol is used this indicates that there is not likely to be a significant effect. Explanatory references are provided below.

SA Objective	1	2	3A	3B	3C	3D	4A	4B	4C	4D	5A	5B	5C	5D
To meet the challenges of a growing and aging population														
To encourage social inclusion, equality, the promotion of equality and a respect for diversity														
To maintain and improve the community's health and accessible healthcare for residents														

SA Objective	1	2	3A	3B	3C	3D	4A	4B	4C	4D	5A	5B	5C	5D
To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth		✓ 1	? 1	? 1	? 1	? 1	? 1	? 1	? 1	? 1	? 1	? 1	? 1	? 1
To develop the economy within environmental limits														
To maintain and enhance employment opportunities within the District		✓ 2	? 2	? 2	? 2	? 2	? 2	? 2	? 2	? 2	? 2	? 2	? 2	? 2
To promote traffic reduction and encourage more sustainable alternative forms of transport			? 2	? 3	? 3	? 3	? 3	? 3	? 3	? 3	? 3	? 3	? 3	? 3
To restore, manage and promote canal towpaths as part of the sustainable transport infrastructure		✓ 3	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4	✓ 4
To reduce crime and anti-social behaviour and the fear of crime											? 5	? 5	? 5	? 5
To provide affordable and decent housing to meet local needs			✓ 4	✓ 5	✓ 5	✓ 5	✓ 5	✓ 5	✓ 5	✓ 5	✓ 6	✓ 6	✓ 6	✓ 6
To reinforce local distinctiveness, local environmental quality and amenity through the conservation and enhancement of the built and cultural heritage		✓ 4	✓ 4	✓ 6	✓ 6	✓ 6	✓ 6	✓ 6	✓ 6	✓ 6	✓ 7	✓ 7	✓ 7	✓ 7



SA Objective	1	2	3A	3B	3C	3D	4A	4B	4C	4D	5A	5B	5C	5D
To implement energy efficiency through building design to maximise the re-use of land and buildings, recycle building materials and use renewable sources of energy.		✓ 5	✓ 4	✓ 7	✓ 7	✓ 7	✓ 7	✓ 7	✓ 7	✓ 7	✓ 8	✓ 8	✓ 8	✓ 8
To implement strategies that help mitigate global warming and adapt to unavoidable climate change within the District														
To ensure that air quality continues to improve			? 8	? 8	? 8	? 8	? 8	? 8	? 8	? 8	? 9	? 9	? 9	? 9
To protect and enhance soil quality														
To maintain and enhance the quality and quantity of ground and surface waters														
To manage and reduce the risk of flooding in new and existing developments														
To conserve and provide enhancement of the natural environment and biodiversity		✓ 6	✓ 9	✓ 9	✓ 9	✓ 9								
To conserve and enhance landscapes and townscapes		✓ 7	✓ 10	✓ 10	✓ 10	✓ 10	✓ 9	✓ 9	✓ 9	✓ 9	✓ 10	✓ 10	✓ 10	✓ 10

SA Objective	1	2	3A	3B	3C	3D	4A	4B	4C	4D	5A	5B	5C	5D
To provide access to the countryside and appropriate land for leisure and recreation use		✓ 8	✓ 11	✓ 11	✓ 11	✓ 11	✓ 10	✓ 10	✓ 10	✓ 10	✓ 11	✓ 11	✓ 11	✓ 11
To minimise the amount of waste produced, maximise the amount of material that is reused or recycled, and seek to recover energy from the largest proportion of the residual material														

3.5 The sustainability effects of these options are documented in Table 1, above, by cross-indexing them with the SA Objectives. If an Option is incompatible with an SA Objective, a cross ('X') is used to highlight this. A question mark ('?') indicates a potential incompatibility. A tick ('✓') denotes that the option is likely to contribute to the achievement of the SA Objective. Where no symbol is used this indicates that there is not likely to be an effect. Explanatory references are provided below.

Option 1

Under this option a 'do nothing' approach is adopted and therefore it is assumed that the status quo is maintained. The option has been assessed as having no effect when measured against the SA objectives.

Option 2

1. The provision of jobs under this option is considered to be significant.
2. The provision of jobs under this option is considered to be significant.
3. Canal towpaths will be restored
4. The option is considered to have a positive impact on local distinctiveness, local environmental quality and amenity.



5. All the options are judged likely to have a positive effect on the climate change objective as Statement 17 in the AAP states a commitment to produce energy efficient buildings and each option involves building re-use.
6. Particular focus would be given to conserving wildlife habitats, archaeology and historic features. This option provides an opportunity to de-culvert a length of the River Frome enhancing its biodiversity value.
7. The option is considered to conserve and enhance landscapes and townscapes.
8. The option will provide appropriate land for leisure and recreation.

Option 3

1. The provision of employment land and jobs is not considered to be significant. This option may have a potential incompatibility with the SA objectives. However the option has not been assessed as incompatible as the option may provide employment diversification and modernisation of facilities. The option will improve the current poor quality of the canal environment, which has been identified as a key constraint to investment in the area. The option may be incompatible with the SA objective as the majority of the development area is dedicated to housing, which may exacerbate current trends for high levels of commuting to work
2. The provision of employment land and jobs is not considered to be significant. This option may have a potential incompatibility with the SA objectives. However the option has not been assessed as incompatible as the option may provide employment diversification and modernisation of facilities. The option will improve the current poor quality of the canal environment, which has been identified as a key constraint to investment in the area. The option may be incompatible with the SA objective as the majority of the development area is dedicated to housing, which may exacerbate current trends for high levels of commuting to work.
3. The proposed mix of housing and employment uses may promote commuting out of the area for work. Given the remote location of the area the majority of out commuting is likely to be by private car and this may have negative impacts on congestion and air quality.
4. Canal towpaths will be restored.

5. The housing provision is judged to be significant.
6. The option is considered to have a positive impact on local distinctiveness, local environmental quality and amenity.
7. All the options are judged likely to have a positive effect on the climate change objective as Statement 17 in the AAP states a commitment to produce energy efficient buildings and each option involves building re-use.
8. The imbalance between housing and employment land uses may promote out commuting for work with associated private car use.
9. The option considers integrating historical conservation interests and wildlife habitats.
10. The option is considered to conserve and enhance landscapes and townscapes.
11. The option will provide appropriate land for leisure and recreation.

Option 4

1. The provision of employment land and jobs is not considered to be significant. This option may have a potential incompatibility with the SA objectives. However the option has not been assessed as incompatible as the option may provide employment diversification and modernisation of facilities. The option will improve the current poor quality of the canal environment, which has been identified as a key constraint to investment in the area. The option may be incompatible with the SA objective as the majority of the development area is dedicated to housing, which may exacerbate current trends for high levels of commuting to work.
2. The provision of employment land and jobs is not considered to be significant. This option may have a potential incompatibility with the SA objectives. However the option has not been assessed as incompatible as the option may provide employment diversification and modernisation of facilities. The option will improve the current poor quality of the canal environment, which has been identified as a key constraint to investment in the area. The option may be incompatible with the SA objective as the majority of the development area is dedicated to housing, which may exacerbate current trends for high levels of commuting to work.



3. The proposed mix of housing and employment uses may promote commuting out of the area for work. Given the remote location of the area the majority of out commuting is likely to be by private car and this may have negative impacts on congestion and air quality.
4. Canal towpaths will be restored
5. The housing provision is judged to be significant.
6. The option is considered to have a positive impact on local distinctiveness, local environmental quality and amenity.
7. All the options are judged likely to have a positive effect on the climate change objective as Statement 17 in the AAP states a commitment to produce energy efficient buildings and each option involves building re-use.
8. The imbalance between housing and employment land uses may promote out commuting for work with associated private car use.
9. The option is considered to conserve and enhance landscapes and townscapes.
10. The option will provide appropriate land for leisure and recreation.

Option 5

1. The provision of employment land and jobs is not considered to be significant. This option may have a potential incompatibility with the SA objectives. However the option has not been assessed as incompatible as the option may provide employment diversification and modernisation of facilities. The option will improve the current poor quality of the canal environment, which has been identified as a key constraint to investment in the area. The option may be incompatible with the SA objective as the majority of the development area is dedicated to housing, which may exacerbate current trends for high levels of commuting to work.
2. The provision of employment land and jobs is not considered to be significant. This option may have a potential incompatibility with the SA objectives. However the option has not been assessed as incompatible as the option may provide employment diversification and modernisation of facilities. The option will improve the current poor quality of the canal environment, which has been identified as a key constraint to investment in the area. The option

may be incompatible with the SA objective as the majority of the development area is dedicated to housing, which may exacerbate current trends for high levels of commuting to work.

3. The proposed mix of housing and employment uses may promote commuting out of the area for work. Given the remote location of the area the majority of out commuting is likely to be by private car and this may have negative impacts on congestion and air quality.
4. Canal towpaths will be restored
5. A number of the characteristics of this option may help to reduce crime and the fear of crime including the creation of a walkable neighbourhood and having a variety of uses with a mix of day and evening uses. However evening drinks venues may have a negative impact on anti-social behaviour.
6. The housing provision is judged to be significant.
7. The option is considered to have a positive impact on local distinctiveness, local environmental quality and amenity.
8. All the options are judged likely to have a positive effect on the climate change objective as Statement 17 in the AAP states a commitment to produce energy efficient buildings and each option involves building re-use.
9. The imbalance between housing and employment land uses may promote out commuting for work with associated private car use.
10. The option is considered to conserve and enhance landscapes and townscapes.
11. The option will provide appropriate land for leisure and recreation.



4 Conclusions

- 4.1** In a number of the options (3, 4 and 5) the majority of the developed area has been dedicated to housing. In each of these options the provision of employment land and jobs are not considered to be significant when judged against the targets set in the Structural Plan. The provision of housing under each of these three options is considered to be significant. The implications of this imbalance of housing and employment provision on the site should be considered given the stated desire to ensure that housing and employment provision are matched to address high levels of commuting out of the district for work. Given the remote location of the area the majority of out commuting is likely to be by private car and this may have negative impacts on congestion and air quality.



Chief Executive: David Hagg

