



**TEWKESBURY BOROUGH PLAN:  
Preferred Options  
Revised Regulation 18 Consultation**

**SUSTAINABILITY APPRAISAL (SA)  
(integrating Strategic Environmental  
Assessment; Health Impact Assessment &  
Equality Impact Assessment)**

**NON-TECHNICAL SUMMARY**

**August 2018**

*enfusion*



# Tewkesbury Borough Council

## Tewkesbury Borough Plan: Preferred Options Revised Regulation 18 Consultation

### SUSTAINABILITY APPRAISAL (SA) [Incorporating Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA)]

[Please note the Habitats Regulations Assessment  
(HRA) Report is available separately]

### Sustainability Appraisal Report NON-TECHNICAL SUMMARY (NTS) March 2018

<i>date:</i>	March 2018 Draft v01 August 2018 v02 Final	
<i>prepared for:</i>	Tewkesbury Borough Council	
<i>prepared by:</i>	Owen Jeffreys Cheryl Beattie Barbara Carroll	Enfusion
<i>quality assurance:</i>	Barbara Carroll	Enfusion

*enfusion*

environmental planning and management for sustainability

Treenwood House  
Rowden Lane  
Bradford-on-Avon  
BA15 2AU  
T: 01225 867112  
[www.enfusion.co.uk](http://www.enfusion.co.uk)

## SA NON-TECHNICAL SUMMARY (NTS)

### Contents

This is the NTS of the Sustainability Appraisal Report  
The Tewkesbury Borough Plan (TBP)  
Sustainability (Integrated) Appraisal: SA, SEA, HIA, EqIA, and HRA  
Sustainability Characteristics of the Tewkesbury Borough area & likely  
evolution without the Local Plan  
Key Sustainability Issues, Problems and Opportunities  
How has the TBP been assessed?  
What reasonable alternatives have been considered & addressed?  
What are the likely significant effects of the Draft TBP: Preferred Options?  
How could negative effects be mitigated?  
EqIA & HRA  
Consultation  
Monitoring Proposals  
Next Steps

### This is the NTS of the Sustainability Report

1. This is the Non-Technical Summary of the Sustainability Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Draft Tewkesbury Borough Plan (TBP). This summary is an integral part of the SA Report that accompanies the Revised Regulation 18 Draft TBP Preferred Options for public consultation in Autumn 2018. It provides an outline of the SA process and findings, including how the SA has influenced the development of the draft 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 Tewkesbury Borough Plan (TBP)

2. The currently adopted Tewkesbury 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. The GCT JCS (plan period to 2031 and adopted December 2017) sets out the housing and employment needs for the Tewkesbury Borough area including the strategic direction for development growth with strategic policies (Strategic, Core, Allocation, and Delivery). The Tewkesbury Borough Plan, covering the administrative area of Tewkesbury borough, is part of a hierarchy of planning guidance, sitting underneath the higher level Joint Core Strategy and national planning guidance.
3. The GCT JCS Policy SP2 makes provision for at least 9,899 new homes within the Tewkesbury Borough area to meet identified local needs. This will be met through the strategic allocation at Ashchurch (JCS Policy A5) and the rest through smaller scale development meeting local needs at Tewksbury Town

in accordance with its role as a market town, at rural service centres, and service villages. The Tewkesbury Borough 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 Draft TBP has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability Appraisal, and consultation with the public, stakeholders and the regulators. The objectives of the TBP are aligned with the agreed community ambitions in the Tewkesbury Sustainable Community Strategy (2008-2028). The Draft TBP sets out the key challenges for the TBP area with a proposed Vision for the development until 2031 and suggests Objectives, based on those set out in the JCS, to address key issues and to help deliver the Vision.
5. The Draft TBP comprises the Vision & Objectives for the Tewkesbury Borough Local Plan area, followed by Chapters with Local Policies as follows:

#### **Chapter 1 Social Factors**

A: Housing (Policies RES1-17)

B: The Green Belt (Policies GRB1-3)

C: Community, Health & Recreation (Policies HEA1, COM1-3, RCN1-4)

D: Gypsies, Travellers & Travelling Showpeople (Policy GAT1)

E: Transport & Accessibility (Policies TRAC1-10)

#### **Chapter 2 Economic Factors**

F: Economy & Tourism (Policies EMP1-6, AGR1-4, TOR1-4)

G: Retail (Policies RET1-8)

#### **Chapter 3 Environmental Factors**

H: Quality Places (Policies DES1-4, HER1-6)

I: Natural Environment (Policies ENV1-3, LAN1-5, NAT1-2)

6. These draft Policies include preferred local site options for allocations for the smaller-scale housing, employment, and the proposed pitches/plots for Gypsies, Travellers & Travelling Showpeople. These Policies will guide the planning and management of growth and development in the Tewkesbury area to accommodate the identified new housing and jobs whilst protecting important and valued environmental assets such as the countryside and the historic heritage. A final Chapter 4 covers Monitoring and Review.

### **Sustainability Appraisal: SA, SEA, HIA, EqIA and HRA**

7. The purpose of Sustainability Appraisal 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.

8. For the Sustainability Appraisal of the TBP, an integrated process has been undertaken that also addresses health and equality issues (to demonstrate compliance with the Equality Act, 2010), alongside the requirements of the Habitats Assessment Regulations. The summary findings of the health, equality, and habitats assessments have been integrated into the Sustainability Appraisal. Tewkesbury Borough Council commissioned independent specialist consultants Enfusion to progress the appraisal work commencing in November 2014. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the higher level strategic plan – the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (adopted December 2017).
9. 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 of the SA is prepared and includes an SA Framework of objectives for sustainable development relevant to the Tewkesbury Borough area and which forms the basis against which the Draft TBP is assessed.

### **Sustainability Characteristics of the Tewkesbury Borough area and likely evolution without the Local Plan**

10. Tewkesbury Borough has a diverse landscape from the largely flat central Vale of the River Severn to the wooded slopes of the Cotswolds to the west; the area is characterised by the two main rivers of the Severn and the Avon (that meet in Tewkesbury) with significant areas of flood risk. The area is mostly rural in character with agricultural uses and over 50% of people living in rural settlements. However, there are significant areas of urban fringe around Cheltenham and Gloucester.
11. Compared with the rest of Gloucestershire, Tewkesbury Borough has a higher than average number of people aged 65 and over, but fewer young people and of working age, and only about 2.5% are from minority ethnic backgrounds. There is a wide range of economic activity and tourism is increasingly important, especially for the rural economy. Employment at 83% is higher than the county at 78.4%. The historic market towns of Tewkesbury and Winchcombe are popular tourist destinations and offer many shopping opportunities.
12. The Borough has many historic buildings and sites, including those of national importance. It also has rich environmental assets with nationally important landscapes (Cotswolds Area of Outstanding Natural Beauty), and a variety of

international, national and locally designated sites for nature conservation, including two Special Areas of Conservation (Dixton Wood and Cotswolds Beechwoods) protected at the European level for their biodiversity value.

13. Transport networks in the Borough area are under increased pressure from new developments and general growth in traffic. The M5 motorway running north-south and located to the east of the area is a dominant feature. The Borough has higher than national averages for residents who travel to work by car. Overall accessibility to public transport is poorest around the northern and eastern rural settlements, improving in and around the main settlements of Tewkesbury Town, Bishop's Cleeve and Winchcombe. There are higher levels of traffic-related nitrogen dioxide in Tewkesbury Town such that the centre is designated an Air Quality Management Area.
14. Without the Tewkesbury Borough Plan to guide and manage new development, pressures on important landscape, heritage and biodiversity assets may cause adverse effects that are difficult to mitigate; housing and employment will not be located in the most sustainable locations with accessibility to transport and community services.

### Key Sustainability Issues, Problems and Opportunities

15. Key sustainability issues, problems and opportunities include the following:

#### Key Sustainability Issues

- Maintaining and where appropriate, improving the quality of water bodies in the Borough (particularly the Rivers Chelt, Swilgate and Severn)
- Reducing the risk of flooding from new development and the impacts of flooding on existing development
- Protecting and enhancing biodiversity where possible, in particular international and national sites
- Maintaining and enhancing green infrastructure for people and wildlife
- High number of the County's recreational assets located within the Borough
- The sensitivity of historic character areas, particularly in rural settings and villages that typify the Cotswolds vernacular design and materials
- 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 and enhancing the riparian landscape of the Rivers Severn and Avon
- Improving air quality in and around the Tewkesbury Town Centre AQMA
- 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 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, including affordable housing that meets the needs of residents
- Supporting the retention of existing businesses, particularly micro businesses that may be more vulnerable to economic change
- Increasing educational attainment levels in the Borough

### How has the TBP been assessed?

16. The proposed scope of the Sustainability Appraisal was set out in the SA Scoping Report, including details of how the draft plan would be assessed. An SA Framework was compiled (based on that used for the GCT Joint Core Strategy to progress a consistency of approach), including SA Objectives that aim to resolve the issues identified for development planning in the TBP area. This SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

No.	SA Objective
1	<b>Housing:</b> To ensure everyone has access to a decent home that they can afford and meets their needs <i>Relevant JCS SA Objective: No 15</i> <i>Relevant TBP Scoping Consultation Objective: No 3</i>
2	<b>Economy &amp; Employment:</b> To ensure the availability of employment land and premises to encourage inward investment, support the growth of existing businesses and the vitality and viability of town and village centres <i>Relevant JCS SA Objectives: Nos. 10, 11, 17</i> <i>Relevant TBP Scoping Consultation Objectives: Nos. 1, 2</i>
3	<b>Healthy Communities:</b> To support communities with inclusive design, enhance wellbeing and promote healthy lifestyles <i>Relevant JCS SA Objectives: Nos. 12, 13, 14, 16, 17</i> <i>Relevant TBP Scoping Consultation Objectives: Nos. 4</i>
4	<b>Access to Services, Facilities and Employment:</b> To improve accessibility to services and facilities, including health and educational facilities <i>Relevant JCS SA Objectives: Nos. 12, 14</i> <i>Relevant TBP Scoping Consultation Objective: 4</i>
5	<b>Access to Public Transport:</b> To maximise the use of sustainable modes of transport and reduce the need to travel by car <i>Relevant JCS SA Objective: 8</i> <i>Relevant TBP Scoping Consultation Objectives: Nos. 4, 6, 7</i>

<b>6</b>	<b>Traffic:</b> To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth <i>Relevant JCS SA Objective: 8</i> <i>Relevant TBP Scoping Consultation Objectives: Nos. 6, 7</i>
<b>7</b>	<b>Air Quality and Climate Change:</b> To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases. <i>Relevant JCS SA Objectives: 2, 3, 5, 6, 9</i> <i>Relevant TBP Scoping Consultation Objectives: 6, 7</i>
<b>8</b>	<b>Water Quality:</b> To maintain and improve the quality of water <i>Relevant JCS SA Objectives: Nos. 5, 6</i> <i>Relevant TBP Scoping Consultation Objectives: Nos. 5, 7</i>
<b>9</b>	<b>Flooding:</b> To manage and reduce flood risk <i>Relevant JCS SA Objective: 4</i> <i>Relevant TBP Scoping Consultation Objectives: Nos. 5, 7</i>
<b>10</b>	<b>Biodiversity:</b> To safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats <i>Relevant JCS SA Objectives: Nos. 1, 16</i> <i>Relevant TBP Scoping Consultation Objective: 5</i>
<b>11</b>	<b>Landscapes:</b> To protect and improve the quality of the landscapes and settings, and reduce the potential for coalescence <i>Relevant JCS SA Objectives: Nos. 5, 6, 16, 18</i> <i>Relevant TBP Scoping Consultation Objective: 5</i>
<b>12</b>	<b>Cultural Heritage:</b> To protect and enhance the area's distinctive historic environment including known and potential archaeological sites, designated and non-designated heritage assets and their settings. <i>Relevant JCS SA Objectives: 7, 18</i> <i>Relevant TBP Scoping Consultation Objectives: 5</i>
<b>13</b>	<b>Land and Soils:</b> To minimise the use of natural resources including soil and greenfield land, and protect safeguarded mineral resources <i>Relevant JCS SA Objectives: 5, 6, 9</i> <i>Relevant TBP Scoping Consultation Objectives: 5, 7</i>

17. Each developing element of the Draft TBP, including potential site options and policies to manage proposed development, was subject to SA. Using the SA Framework of Objectives and decision-aiding questions, the baseline information, and professional opinion, the likely effects of the emerging Draft TBP were assessed. The SA considered positive/negative, short/long term, and cumulative effects where possible, and according to categories of significance as set out in the following table:

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

18. The SA made suggestions to the plan-making team for mitigating any significant negative effects identified, where possible, and any possibilities for enhancement, where relevant. 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?**

19. Various options for accommodating proposed growth and development in the Gloucester, Cheltenham and Tewkesbury local authority areas were considered for the Joint Core Strategy and have been variously subject to SA/SEA and wide consultation. This included strategic options for the amount and distribution of development, and the potential strategic site allocations for the JCS and including the Tewkesbury Borough area. Thus, the TBP (as a Local Plan that is in conformity with the JCS) is limited in the extent of options that are meaningful and proportionate. The TBP investigated potential options for local site allocations in the emerging draft Plan, and the SA tested those options that were considered to be reasonable alternatives.
20. The Initial Draft TBP with draft Policies and Site Options (February 2015) acknowledged that these options would collectively provide far in excess of the total numbers of housing sought for the rural areas. It was explained that

these potential options would be refined before identifying preferred options to take forward in the next stage of plan-making.

21. The JCS adopted in December 2017 does not change the strategic direction of JCS Policy SP2 but the housing requirement for Tewkesbury Borough was increased from 8,565 to 9,800 dwellings for the plan period, and the list of Service Villages was revised to include Stoke Orchard and delete Twigworth. Furthermore, since 2015, there have been significant changes to the site options to be considered for the emerging TBP, for example, some options have gained planning permission, others are no longer available, and new options have been brought forward.
22. The Council used a Sites Assessment Method to investigate potential site options and the SA tested all those options that were considered to be reasonable alternatives (suitable and deliverable). The SA considered cumulative effects and the inter-relationships between sustainability topics, and made comments with regard to any significant effects identified for each settlement area, where possible. The outline reasons for selection or rejection of site options and progression as preferred options was set out in the SA Report. The findings of the SA informed this selection but they are not the sole source of information to inform decision-making as part of the plan preparation.

### **What are the likely significant effects of the Draft TBP: Preferred Options? How has the SA influenced the draft TBP**

23. Overall, the implementation of the policies presented in the Draft TBP were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from the SA, 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 seeking to meet the housing needs of the TBP area - will also support economic objectives; good quality housing will have direct cumulative positive effects on health
  - Ensuring that community facilities and other supporting infrastructure will be provided with both short and long term positive effects
  - Support for the economy and employment – will also have further positive effects for health and wellbeing; also, for the vitality of town and village centres
  - Flooding is a particular issue for the TBP area and policies control any increase in flood risk with positive effects – directly and cumulatively with regard to flooding and health risk
  - Landscape, biodiversity and historic assets are protected

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, congestion, loss of tranquillity arising from the overall predicted growth in road based traffic
- Effects on landscape and indirect effects for biodiversity, where local level habitats and linkages disturbed or removed – cumulative in the longer term

### How could negative effects be mitigated?

24. A key aspect of the SA process is to provide advice and recommendations in order to help mitigate identified negative effects (and enhance positive effects). The proposed Policies presented in the Draft TBP include findings arising from SA work undertaken. In particular, the findings of the SA helped the selection of potential site allocations by avoiding locations that might have significant negative effects, for example on nationally protected biodiversity and heritage assets, or those with limited accessibility to community services; also suggesting any site-specific recommendations that could provide mitigation measures.
25. Potential negative effects have been mitigated through strong policies that protect the natural environment and promote sustainable communities through requirements for appropriate provision and phasing of supporting infrastructure, such as community centres and transport. A strong feature of the JCS is the commitment to Green Infrastructure, recognising the many benefits it can provide, including managing flood risk, enhancing biodiversity, and providing recreational and tranquil spaces for people. Potential negative effects on local biodiversity in the Draft TBP will be mitigated through the requirement to conserve and improve biodiversity in new development, wherever possible – and to be considered within a wider strategic approach to green infrastructure that will have cumulative positive effects in the long term.

### EqIA & HRA

26. The equalities screening assessment has found that the Draft TBP is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and thus a full EqIA will not be required. Overall, effects were compatible and positive, or not applicable, with regard to protected persons; no negative effects were identified.
27. There are two European Sites in the Borough area and others nearby. A screening assessment of the Draft TBP was carried out to determine if the emerging policies and potential sites have the potential for likely significant effects on any European sites. The screening found that the development

proposed in the Draft TBP is considered unlikely to have significant effects on any European sites.

28. The HRA considered the likely effects on air quality, disturbance, changes in water levels or quality, and habitat loss or fragmentation – from the Plan individually, or in combination with effects from other plans and projects. The HRA screening assessment found that the mitigation provided through Draft Local Plan Policies was sufficient such that there were no likely significant effects alone, or in-combination, as a result of the implementation of the Plan.

### **Were there any difficulties encountered?**

29. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment.

## **Consultation**

30. The proposed scope of the SA was consulted formally at the scoping stage in December 2014 with the statutory bodies (English Heritage, Environment Agency, and Natural England) and through the Council's website for wider consultation with stakeholders and the public. Representations were received and minor amendments were made to the SA Scoping Report, including additional information for the baseline.
31. The initial draft TBP and its accompanying SA documents were provided for consultation through the Council's website in 2015. Comments made and responses have been recorded and taken into account in the further revision of the draft Plan. Consultation is a vital ongoing and iterative element of both the plan-making and the SA processes. The Draft TBP Preferred Options (September 2018) and the accompanying SA Report (August 2018) reflect the findings of various technical studies and the responses received so far during consultation. Comments received on this revised Regulation 18 consultation will be taken into account in the SA and the next stage of plan-making – preparation of the Pre-Submission Local Plan.

## **Monitoring Proposals**

32. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. Monitoring proposals will be progressed, including consultation, as the draft TBP progresses. Tewkesbury Borough Council will

prepare a monitoring strategy that will include consideration of any specific requirements from the IA process.

## Next Steps

33. The Draft Tewkesbury Borough Plan Preferred Options and this accompanying Sustainability Appraisal Report will be available for consultation for a period of approximately six weeks during Autumn 2018. The documents are available to download from the TBP website at <http://www.tewkesbury.gov.uk/planningpolicy> and at 'deposit locations' across the area, as set out in the Consultation Statement.
34. Comments on the draft Sustainability Report of the Draft Tewkesbury Borough Plan are encouraged to be made online via the Tewkesbury Borough Council website at [www.tewkesbury.gov.uk](http://www.tewkesbury.gov.uk).

Alternatively comments can be submitted by email to [localplanconsultation@tewkesbury.gov.uk](mailto:localplanconsultation@tewkesbury.gov.uk)

or in writing to: Planning Policy, Tewkesbury Borough Council, Gloucester Road, Tewkesbury, Gloucestershire, GL20 5TT.