### Key Issues:

A planning application for the redevelopment of the former HMP Gloucester was submitted in June 2017. Following the initial consultation period, Gloucester City Council (‘GCC’) determined through a screening opinion that the scheme was likely to have significant effects on the environment, comprising the potential for impacts on potential archaeological remains and the site’s historic location.

Following consultation and formal representations to the Council and the Secretary of State, it was agreed that the Environmental Impact Assessment (‘EIA’) for the scheme would assess archaeology and built heritage only, with all other technical considerations scoped out.

In understanding the key receptors required for assessment, extensive consultation was undertaken with the Council and its internal officers, Historic England and the Secretary of State, to ensure the scope of the ES was appropriate for the scale of the development and likely significant impacts on the environment.

### Purpose of the project:

The prison opened as a County Gaol in 1791 and was subsequently rebuilt in 1840. It comprises of a number of listed buildings and structures, with there being four core listed buildings at Grade II and one at Grade II*. City & Country Gloucester Ltd acquired the prison from the Ministry of Justice following its closure in 2013, with the intention of delivering a residential-led mixed-use development at the site.

### Description of the project:

Redevelopment of the former HMP Gloucester site comprising the partial demolition and conversion of Grade II* and Grade II listed buildings to provide 38 residential dwellings (Use Class C3) and 481 sqm (GIA) of flexible commercial/community floorspace (Use Classes A2, A3, A4, A5, B1, D1, D2) at ground floor and first floor of Block C (Chapel Wing); demolition of non-listed structures and the construction of seven new buildings up to six storeys to accommodate 164 residential dwellings (Use Class C3); and associated car parking, cycle parking, private and communal amenity space, landscaping, access and related infrastructure works.
## EIA Learning Outcomes

### Lessons learnt:
The EIA for this scheme was undertaken following the submission of the planning application, which posed many new challenges, though did also have its benefits.

Due to the timeline of the planning application having already been submitted, a formal scoping process had not been undertaken, and this required Lichfields, as the Environmental Statement ('ES') co-ordinator to be very proactive with case officers in determining the scope of the assessment, and where the likely key sensitivities on the environment lay.

With regard to the sensitive receptors likely to be affected, these were identified through extensive consultation with relevant Officers at the Council and stakeholders, and by interpreting consultation received to date on the application and the screening opinion issued by the Council. A key benefit of this allowed all parties to focus on the sensitive receptors, with the consultation process also acting as a screening stage for less sensitive issues such as transport and ecology. This ensured that the ES was a proportionate document, with only cultural heritage and archaeology considered, as much of the assessment work had already been undertaken by consultants at the site.

### Lessons learnt continued:
Whilst this process did allow for proportionate EIA to be undertaken, there was a clear timescale implication which would otherwise have been likely to be shorter had engagement happened with the local authority and stakeholders at an earlier stage. In future, we would try to ensure that where a project may or may not be subject to EIA, that Lichfields is engaged earlier in the process for the scheme and able to advise on the likelihood or otherwise for EIA. However, this would also need to be balanced against the fact that assessment work would not have been undertaken (or completed) on topics such as transport and ecology, and that the ES might otherwise have been a longer document, had the scoping process happened at an earlier stage.

A key benefit to the completion of the ES was that the scheme had already been finalised and submitted, ensuring that assessment was not being undertaken with insufficient information available. However, this had to be balanced alongside the fact that the consultation process for the determination of the planning application was underway, and this was identifying various design changes. Thus, the technical consultants undertaking the EIA had to be live to changes to the scheme as the assessments of significant impacts on the environment were being undertaken, and the ES was being completed.

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