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Our ref
Your ref
Date 29th March 2018

By email only

Dear Andrew,

Draft Hengrove and Whitchurch Park Neighbourhood Plan Strategic Environmental Assessment/Habitat Regulations Assessment – Screening Determination

To assist in the production of the Hengrove and Whitchurch Park Neighbourhood Development Plan, Bristol City Council undertook a Strategic Environmental Assessment screening exercise. This was intended to determine whether or not the Neighbourhood Development Plan (NDP) would require a Strategic Environmental Assessment.

SEA Screening Opinion – Bristol City Council

A pre-submission version of the Hengrove and Whitchurch Park NDP, received in December 2017 by Bristol City Council, and revisions to the text of policy HWP4, confirmed to Bristol City Council in March 2018, were used to consider the likely environmental effects. To ensure legal compliance and a robust screening opinion Bristol City Council considered the likely effects of the NDP against the criteria in Schedule I, of the Environmental Assessment of Plans and Programmes Regulations 2004. The consideration of likely effects against the Schedule I criteria are available to view in **Appendix I**.

Following analysis of likely significant effects Bristol City Council considered that the draft Hengrove and Whitchurch Park NDP was unlikely to have any significant effects on the environment and therefore, determined that a Strategic Environmental Assessment of the Hengrove and Whitchurch Park Neighbourhood Development Plan was not required.

As required by Regulation 9(2) (a) of the Environmental Assessment of Plans and Programmes Regulations 2004, the screening opinion and determination was then sent to Historic England, Natural England and the Environment Agency to arrive at a determination in consultation with the statutory consultees. This was sent on 1st March 2018 and is available to view in **Appendix I**.

SEA Screening Opinion

Response was received from Historic England and Natural England, both statutory consultees agreed with Bristol City Council's screening opinion, that the Hengrove and Whitchurch Park Neighbourhood Development Plan was unlikely to give rise to significant environmental effects and therefore would not require Strategic Environmental Assessment.

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No comment was received from the Environment Agency.

The response of Historic England and Natural England can be viewed in **Appendix II**.

Habitat Regulation Assessment Screening Opinion

Natural England utilised the information within the analysis of likely significant effects to also determine that the Hengrove and Whitchurch Park NDP would be unlikely to give rise to significant environmental effects on European Designated Sites and can therefore be screened out from any requirement for further assessment under the Habitat Regulations. This determination is also available to view in **Appendix II**.

Determination

The draft Hengrove and Whitchurch Park NDP is unlikely to give rise to significant environmental effects which would require Strategic Environmental Assessment, or have significant effects on European Designated Sites that would require consideration under the Habitats Directive. This determination has been arrived at in agreement with relevant statutory consultees.

For the purpose of demonstrating that the NDP is unlikely to have significant effects on the environment, as required by regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended), **Appendix I** of this document could be considered to form the statement of reasons.

Yours sincerely

A handwritten signature in black ink that reads "Sarah O'Driscoll". The signature is written in a cursive style and is contained within a thin black rectangular border.

Sarah O'Driscoll
Strategic City Planning Manager

Enclosures

Appendix I: BCC Screening Opinion and Determination - February 2018

Appendix II: Response of Historic England and Natural England to BCC Screening Opinion

Hengrove and Whitchurch Park Neighbourhood Development Plan

Strategic Environmental Assessment & Habitat Regulations Screening Opinion and Determination

February 2018

Purpose of this Screening Opinion

The screening opinion has two purposes. Firstly, to determine whether the draft Hengrove and Whitchurch Park Neighbourhood Development Plan (HWP-NDP) is likely to have significant environmental effects and require strategic environmental assessment (SEA). Secondly, to determine whether the plan has potential negative or uncertain effects on Natura 2000 sites of relevance, which would require further consideration under the Habitats Regulations.

This screening opinion has been produced by Bristol City Council, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and Habitats Regulations 2010.

As required by Regulation 9(2)(a) of the Environmental Assessment of Plans and Programmes Regulations 2004, and Habitats Regulations 2010, this screening opinion has been sent to English Heritage, Natural England and the Environment Agency in order for the council to arrive at a determination, in consultation with the statutory consultees.

Likely Effects

The pre-submission version (regulation 14 – The Neighbourhood Planning (General) Regulations 2012) of the HWP-NDP received in December 2017 by Bristol City was used to consider the likely environmental effects and effects on Natura 2000 sites of relevance.

The criteria in Schedule I, of the Environmental Assessment of Plans and Programmes Regulations 2004, have been utilised in this screening opinion to assist Bristol City Council's consideration of the likely effects of the HWP-NDP and to make a robust determination.

In considering likely effects baseline data and findings within the Site Allocations and Development Management Policies Local Plan Sustainability Appraisal have been utilised, where they relate to the Hengrove and Whitchurch neighbourhood.

The Habitat Regulations screening opinion has been informed by the conclusions of the Core Strategy Habitats Regulations Assessment (2011) and the Screening Determination for the Site Allocations and Development Management Policies Plan (2013).

In addition to this information the most current and available data for certain environmental issues were considered as the basis for the screening opinion.

Flood Risk

A number of studies have taken place to determine the extent and vulnerability of different parts of the city to flood risk. The primary studies of relevance to the Hengrove and Whitchurch neighbourhood utilised in this screening opinion were;

- Environment Agency National Flood Zone data.
- Surface Water Management Plan 2014.

The Surface Water Management Plan used hydraulic modelling software to predict the flood risk posed to the entire city from surface water and sewer flooding. This data was not intended to assess individual sites. However, the study identified a number of High Risk areas across the city that are potentially at greater risk of flooding.

Heritage and material assets

The Bristol Historic and Environmental Records contain regularly maintained and updated information on;

- Conservation Area boundaries;
- Article 4 directions;
- Registered Parks and Gardens both nationally and locally Designated;
- Scheduled Ancient Monuments; and
- Listed Buildings.

The record also has information on undesignated assets, such as known archaeology and non-designated above ground heritage assets.

Nature Conservation

- International designations; Special Protection Areas, Special Areas of Conservation and Ramsar Sites.
- National Designations; Sites of Special Scientific Interest (SSSI).
- The Bristol Wildlife Network, consisting of Sites of Nature Conservation Interest and Wildlife Corridors. Taken from the Bristol City Council, online mapping tool; <http://www.bristol.gov.uk/page/explore-bristol-city-centre>

Bristol City Council - Screening Determination

The consideration of likely environmental effects, against the criteria in Schedule I, is set out in Appendix 1 of this screening opinion.

From the analysis of likely effects (contained within appendix 1) Bristol City Council considers that the draft HWP-NDP is unlikely to have any significant environmental effects. Therefore Strategic Environmental Assessment, of the draft Hengrove and Whitchurch Park Neighbourhood Development Plan is not required.

From the information contained within the schedule it is also determined that no significance negative or uncertain effects, on the Severn Estuary SPA/SAC Natura 2000 site, arise as a result of this Neighbourhood Plan. Therefore the HWP-NDP can be screened out from further consideration under the Habitats Regulations.

This determination is subject to consultation with Historic England, Natural England and the Environment Agency as per Article 6(3) of the SEA Directive.

Environmental Assessment of Plans & Programmes Regs 2004 – Schedule 1 Criteria	Response	Is there a significant effect?
The characteristics of plans and programmes, having regard, in particular, to:		
<p>Criterion 1</p> <p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The draft Hengrove and Whitchurch Park Neighbourhood Development Plan would, if made, form part of the Statutory Development Plan. It would therefore contribute to the framework for future development consents of projects.</p> <p>The plan sits within a wider framework, set by National Planning Policy Framework and Bristol Local Plan documents (Core Strategy, Site Allocations and Development Management Policies and Bristol Central Area Plan). However, the framework set by this plan is for localised projects and activities, with limited effects and resource implications.</p>	No
<p>Criterion 2</p> <p>The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.</p>	<p>The plan adds local level detail to assist in determining planning applications within the plan boundary. The plan will become a material consideration in the determination of applications for planning permission. As such, it is critical that the plan accords with the documents and policies within the Bristol Local Plan to ensure that undesired conflicts do not occur that will negatively influence policy implementation of the Bristol Local Plan.</p> <p>An assessment of the draft HWP-NDP against the general requirements held in Schedule 10 of the Localism Act 2011, has raised issues of conformity with some policies of the Bristol Local Plan. However, this is a separate issue to that of whether the plan creates a significant environmental effect beyond which was previously assessed through the Bristol Local Plan Sustainability Appraisal process.</p> <p>The plan is focussed upon the regeneration of Hengrove Park, with a great level of detail given to outcomes of development at this location, while wider policies relating to open space protection and elderly housing provision cover the neighbourhood planning area.</p> <p>The level of detail relating to the development of Hengrove Park is based upon the Forum’s Masterplan for regeneration, creating very prescriptive policy demands for the site. While this is not considered to be in ‘general conformity’ with the Bristol Local Plan, which allows a flexible approach to individual sites, the details and policy requirements are not concluded to create significant environmental effects and remain within the parameters of the potential effects assessed under the Local Plan Sustainability Assessment (SA).</p> <p>The site is currently allocated for development in the Bristol Local Plan and underwent environmental assessment through the SA relating to a range of development outcomes. The policy requirements set out in the draft HWP-NDP are considered to fall within the parameters that were previously subject to assessment.</p> <p>In conclusion, it is considered that the general strategic aims and</p>	No

Environmental Assessment of Plans & Programmes Regs 2004 – Schedule 1 Criteria	Response	Is there a significant effect?
	<p>policies of the draft HWP-NDP would not have undue influence over other associated plans and policies that have been subject to environmental assessment undertaken through the Bristol Local Plan Sustainability Assessment. No significant environmental effects are, therefore, predicted.</p>	
<p>Criterion 3 The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>The plan generally seeks to focus on the opportunity to regenerate the area of Hengrove Park as a sustainable community hub, with open space, housing, jobs and facilities being directed towards this location.</p> <p>No sites for allocation are included in the plan and so the existing allocated sites in the Local Plan will continue, which have been the subject of SEA assessment through the Sustainability Assessment.</p> <p>Specific policies relating to environmental factors are HWP1, HWP2, HWP4, HWP5 and HWP6.</p> <p>HWP1 outlines the policy approach for the future Hengrove Park providing a wish list of specific features and facilities that should be introduced. These would generally have a positive effect for the future open space.</p> <p>Policy HWP2 indicates broadly where wildlife links should emanate from the future Hengrove Park and where they should link up to. This generally reflects Local Plan policy and would have a positive impact on green infrastructure.</p> <p>Policy HWP4 seeks to designate open spaces for protection and includes the following 7 spaces not currently designated as Important Open Space in the Local Plan :</p> <p>Land between Copeland Dr and Wedgewood Close Land fronting Allerton Crescent Land between Allerton Road and Evercreech Road Land off Warncliffe Gardens Corner of Rookery Way and Court Farm Road Land fronting Tanorth Road Land fronting Coulson’s Road</p> <p>The protection of open space accords with the principles set out in Local Plan policy and would have a positive impact on green infrastructure in the area.</p> <p>Policy HWP5 sets out spaces to be protected as ‘Local Green Space’(LGS) and would provide a robust protection of the sites</p>	<p>No</p>

Environmental Assessment of Plans & Programmes Regs 2004 – Schedule 1 Criteria	Response	Is there a significant effect?
	<p>identified for this designation. While the current Local Plan does not include LGS designation, this is in line with the NPPF (para 76) and broadly follows Local Plan policy. This is not considered to raise any issues. Sites put forward for this level of designation are as follows:</p> <p>Hengrove Park (as remodelled in new development) and Green Fingers, St Giles Estate Hengrove Park Children’s Area and Skate Park Whitchurch Green The Mounds SNCI Hartcliffe Community Park Farm St Augustine’s Park Hengrove Farm Community Woodland</p> <p>Similarly, Policy HWP6 seeks to provide new allotments through residential development, albeit at an increased level to that indicated in the Local Plan. However, this is not considered to create any significant effects.</p>	
<p>Criterion 4 Environmental problems relevant to the plan or programme</p>	<p>Environmental issues to be considered include:</p> <ul style="list-style-type: none"> • Flood risk; • Heritage; • Ecology; • Transport with associated noise and air quality effects. <p>The plan does not include specific policies relating to flood risk. There are small areas of flood zones 2 and 3 found at the very north boundary of the plan area, along Airport Road and the very south of the area adjacent to the East Dundry Slopes SNCI in the Green Belt. The plan is not making any allocations for development and is unlikely to give rise to any issues related to flooding. In the absence of specific policy, issues will be covered through exiting Local Plan policy and no significant environmental effects are predicted.</p> <p>Policy HWP3 includes wording relating to the promotion of heritage, which seeks to protect the unlisted former runway at the Hengrove Park site and would protect an asset of local importance. Two Listed Buildings exist in the plan area that are referred to in the introductory text, but no policy wording is proposed to directly protect heritage assets. Again, in the absence of specific policy, issues will be covered through exiting Local Plan policy and no significant environmental effects are predicted.</p> <p>Policy HWP12 highlights the issue of high and growing car use in the plan area. It deals with promoting sustainable travel and seeks to reduce car use and encourage sustainable modes of transport in relation to the regeneration of Hengrove Park and promotes links to wider cycle networks. This is aligned to Local Plan policy.</p> <p>There is no direct policy relating to ecology or nature conservation, though this is linked to policy on open space, which is assessed above. The area does include several important SNCI sites – The</p>	<p>No</p>

Environmental Assessment of Plans & Programmes Regs 2004 – Schedule 1 Criteria	Response	Is there a significant effect?
	Mounds, Hawkfield Meadow and Bamfield SNCIs, along with East Dundry Slopes SNCI in the Green Belt. These sites will continue to be protected through current Local Plan policy and no significant effects are predicted.	
<p>Criterion 5</p> <p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).</p>	<p>The plan sits within a broader national and local policy framework that takes into account the requirements of Community legislation. The plan is not considered to be directly responsible or related to implementing Community legislation on the environment.</p>	No
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
<p>Criterion 6</p> <p>The probability, duration, frequency and reversibility of the effects,</p>	<p>The plan is not considered to create significant environmental effects.</p>	No
<p>Criterion 7</p> <p>The cumulative nature of the effects,</p>	<p>The plan is not considered to create significant environmental effects.</p>	No
<p>Criterion 8</p> <p>The transboundary nature of the effects,</p>	<p>The plan is not considered to create significant environmental effects.</p>	No
<p>Criterion 9</p> <p>The risks to human health or the environment (e.g. due to accidents),</p>	<p>The plan is not considered to create significant environmental effects.</p>	No
<p>Criterion 10</p> <p>The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),</p>	<p>The plan area covers roughly 550 hectares in the south of the city and is home to approximately 17,400 people.</p> <p>The majority of effects would be restricted to the local area. The allocation for development of the Hengrove Park site has been subject to environmental assessment previously and no other sites for allocation are identified in the plan.</p>	No
<p>Criterion 11</p> <p>The value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage, exceeded</p>	<p>The vulnerability of the area in regard to environmental features is addressed under Criterion 4 above, and there are no further special considerations to be made for the plan area.</p> <p>There are no international or national ecological conservation designations within the plan boundary.</p> <p>Outside the plan boundary, the Dundry Main Road South Quarry</p>	No

Environmental Assessment of Plans & Programmes Regs 2004 – Schedule 1 Criteria	Response	Is there a significant effect?
<p>environmental quality standards or limit values, intensive land-use, and; Criterion 12</p> <p>The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>and Bams Batch Spinney SSSI's sit approximately 3km to the south west, with the Mendip Hills AONB further south and the Cotswolds AONB several kilometres to the east. At such distance no significant impact on these sites are predicted.</p> <p>No effects on any other environmental features or assets recognised as being of national, Community or international protection status have been identified.</p>	

Appendix II: Response of Historic England and Natural England to BCC Screening Opinion

Historic England response via email dated 20/03/2018

Many thanks for your consultation on the SEA Screening Opinion for the Hengrove and Whitchurch Park Neighbourhood Plan.

I can confirm that we have no objection to the view that an SEA is not required.

I can also confirm that there were no issues associated with the Regulation 14 consultation version of the Plan upon which we felt the need to comment.

Kind regards

David

David Stuart | Historic Places Adviser South West
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Natural England response via email dated 27/03/1018

Thank you for consulting Natural England regarding the above.

We have considered the screening assessment of the Hengrove and Whitchurch Park Neighbourhood Plan against the requirements of the criteria set out in the SEA Directive. We have also noted the HRA screening report that has been carried out for the draft Plan. Based on the information provided, Natural England agrees the emerging Neighbourhood Plan appears unlikely to give rise to significant environmental effects and the conclusion that a Strategic Environmental Assessment is not required is reasonable.

Kind regards

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