

Bristol City Council
Local Plan Review

Sustainability Appraisal Scoping Report

February 2018



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1. Introduction

The Bristol Local Plan Review (LPR)

- 1.1 The current planning policies for the Bristol are contained in the Core Strategy (2011); the Site Allocations and Development Management Policies DPD (2014); and the Bristol Central Area Plan (2015) which together comprise the Bristol Local Plan. The aim of the review is to combine the current suite of documents into a single form. Policies will be reviewed and updated to be in accordance with the Joint Spatial Plan for the West of England.
- 1.2 The review will include an overall updating of the document; develop existing policies where required and focus in particular on any areas of policy affected by recent changes in national planning policy and guidance.
- 1.3 As the previous Sustainability Appraisal (SA) framework was established some time ago, it is appropriate to develop a new SA framework for the LPR. As such, this Scoping Report considers the context and scope of an SA for the LPR and establishes an assessment process to ensure that the policies and site allocations in the LPR can be assessed against suitable sustainability objectives. The results of the SA assessment will be published alongside the Local Plan document.

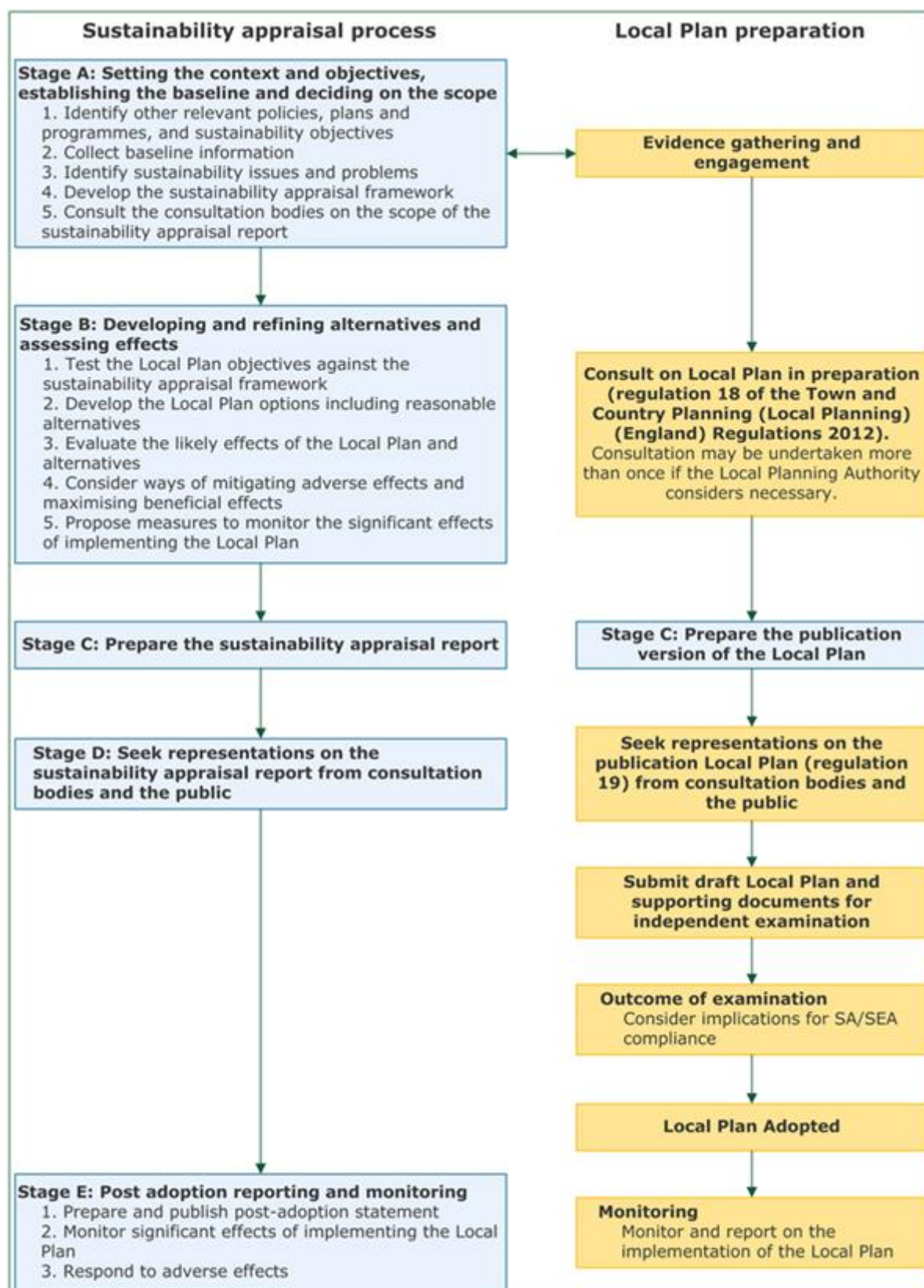
Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

- 1.4 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan, shown in Figure 1.1. The purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social sustainability objectives¹.
- 1.5 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in Paragraph 165 of the National Planning Policy Framework (NPPF). Extant guidance recommends that SA incorporates the requirements for Strategic Environmental Assessment (SEA) set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which implements the requirements of the EU SEA Directive².

¹ Department for Communities and Local Government - National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal.

² EU Directive 2001/42/EC

Figure 1.1: Sustainability Appraisal stages



Source: Planning Practice Guidance (March 2014) *Strategic environmental assessment and sustainability appraisal* (paragraph 0.14, ref 11-014-20140306)

- 1.6 National Planning Practice Guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 1.1. These key stages and tasks are applicable to the SA process for the Bristol Local Plan Review. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.
- 1.7 The scoping stage is the first stage (Stage A) of the SA process and must identify the scope and level of detail of the information to be included in the SA Report. It sets out the context, objectives and approach of the assessment; and identifies relevant environmental, economic and social issues and objectives. The key role of the SA is to identify any possible adverse impacts on sustainability by assessing emerging policies against a series of sustainability criteria. The SA may result in suggestions for alternative policy options or recommendations for mitigating policy impacts.

Purpose and Structure of this SA Scoping Report

- 1.8 This document reports the scoping stage of the SA process for the Bristol Local Plan. As per Figure 1.1, the scoping report must clearly set out several key tasks. Following this introductory Section 1, which describes the background to the SA process, this report is structured into five further sections as shown in Table 1.1.

Table 1.1: Structure of the Scoping Report

Stage A:	Setting the context and objectives, establishing the baseline and deciding on the scope	
Task A1	Identifying other relevant plans, programmes and sustainability objectives	Section 2
Task A2	Collecting baseline information	Section 3
Task A3	Identifying sustainability issues and problems	Section 4
Task A4	Developing the SA framework	Section 5
Task A5	Consulting on the scope of the SA	Section 6

- 1.9 This report has been divided into sections according to each of the tasks in Stage A of the Sustainability Appraisal process. Section 2 contains a summary of relevant plans or programmes, which have an influence on the preparation of the LPR with a full account of each document held in Appendix A. Similarly, the baseline information set out in Section 3 incorporates the general headlines of the state of Bristol according to relevant indicators.

1.10 Section 3 has also been further segregated into primary topics related to sustainability, these being:

- Population, Housing and Communities
- Health and Inequalities
- Economy and Employment
- Townscape and Landscape
- Transport and Movement
- Climate, Energy and Waste

1.11 Section 4, which is an analysis of the baseline, associates each of these topics to the relevant considerations required by Schedule 2 of the SEA and draws out the key sustainability issues arising from the baseline analysis.

1.12 Using both the analysis of the baseline data in combination with the evaluation of relevant plans and programmes, Section 5 sets out the Sustainability Framework to be used to assess the outcomes of the LPR. This includes the production of a number of Sustainability Objectives (SO) the outcomes will be assessed against. These SOs are set out in Table 5.2.

2. Policies, plans and programmes relevant to the LPR

- 2.1 It is an SEA requirement that the SA Scoping Report clearly describes related plans and programmes that influence on the production of the Local Plan. In the context in which the Bristol Local Plan will sit, only the pertinent policies, plans, programmes, strategies and initiatives (PPPSI) are included here. It is noted that there is a raft of international and national policy that will have an indirect influence on the Local Plan, however, for the purposes of this scoping report it is considered that these have been translated into more immediately relevant strategic national and local documents. For this reason, very high level PPPSIs are not presented in this report.
- 2.2 An assessment of all relevant plans is set out in Appendix A, a summary of which is set out in Table 2.1 below. This is not an exhaustive list, and will be updated throughout the Sustainability Appraisal process as other plans and programmes are approved or added where appropriate.

Table 2.1: Key issues arising from the assessment of relevant PPPSIs

Recognise local and regional housing needs and increase housing supply accordingly
Make efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings
Provide a wide range of good quality housing to meet the diverse needs of the community
Protect birds, habitats, plants, animals, designated sites, trees, woodlands, forests and biodiversity
Recognise the value of the natural environment and green and blue infrastructure
Promote sustainable modes of transport, particularly cycling and walking
Combat poverty
Reduce inequalities and improve safe access to all services
Promote healthy lifestyles and reduce health inequalities
Encourage a strong and diverse economy
Reduce all forms of pollution and reduce the risks of exposure to pollution
Conserve and enhance soil resources
Protect the best and most versatile land
Reduce flood risk
Reduce water consumption
Protect and enhance water quality and the condition of water resources
Conserve and enhance air quality
Reduce greenhouse gas and carbon emissions
Reduce climate change
Promote mitigation and adaptation to climate change
Reduce energy consumption, promote energy efficiency and increase the amount of energy from renewable sources
Reduce both the amount of waste generated and the amount sent to landfill and Increase the re-use and recycling of materials

Conserve and enhance landscape character and promote the conservation and enhancement of designated landscapes
Protect designated and non-designated heritage assets and conserve and enhance the historic environment
<p>Recognise the key commitments set by Bristol City Council:</p> <ul style="list-style-type: none"> · We will build 2,000 new homes – 800 affordable – a year by 2020 · We will deliver work experience and apprenticeships for every young person · We will not impose future RPZs and will review existing schemes · We will protect children’s centre services · We will increase the number of school places and introduce a fair admissions process · We will put Bristol on course to be run entirely on clean energy by 2050 and introduce a safe, clean streets campaign · We will be a leading cultural city, making culture and sport accessible to all

3. Baseline Information

3.1 Baseline information refers to current economic, social and environmental position – in this case – in Bristol. It is collected using a number of indicators, such as population estimates and numbers of Listed Buildings etc, and is a requirement of the SEA and NPPF (Task A2 in the guidance). This baseline information allows potential effects of the Local Plan to be predicted and monitored and also enables the identification of sustainability issues (Task A3). These then set the context and define the scope for and of the SA framework.

3.2 Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out a number of topics that must be considered and presented, which are as follows:

- (a) biodiversity;
- (b) population;
- (c) human health;
- (d) fauna;
- (e) flora;
- (f) soil;
- (g) water;
- (h) air;
- (i) climatic factors;
- (j) material assets;
- (k) cultural heritage, including architectural and archaeological heritage;
- (l) landscape;

3.3 This section presents an overview of Bristol's baseline evidence set out in topics incorporating the SEA requirements.

Population, Housing and Communities

3.4 The population of Bristol is estimated to be 454,200³ people. Bristol is the largest city in the South West and one of the ten 'Core Cities' in Great Britain; is the 8th largest city in England and the 10th largest local authority in England. Bristol Local Authority accounts for around 70% of the total population of the built-up area of the city, which is often referred to as 'Greater Bristol', or the 'Bristol Urban Area'. The population of the Bristol Urban Area is estimated to be 648,800 (mid-2015).

³ ONS 2015 Mid-Year Population Estimate

- 3.5 Following a period of population decline in the post war years, the population stabilised in the 1990s and increased substantially during the 2000s. Population growth has been particularly concentrated in central areas of Bristol.

Population composition

Figure 3.1: Mid-2016 Population Pyramid

Source: ONS 2016 Mid-Year Population Estimates. Crown Copyright.



- 3.6 Bristol has a relatively young age profile with more children aged 0-15 than people aged 65 and over. The median age of people living in Bristol in 2016 was 32.9 years old, this compares to the England and Wales median of 39.9 years. The profile of Bristol's population by five year age band and sex is illustrated in Figure 3.1.

Bristol trends

- 3.7 Since 2006 the total population of Bristol Local Authority is estimated to have increased by 45,800 people an increase of 11.2%, this compares to an England and Wales increase of 8% over the last decade. The growth in population includes an additional 10,000 students, raising the total number of students living in Bristol during term time to 35,638.
- 3.8 Table 3.1 shows the population change in Bristol by age band. Between 2006 and 2016 the number of children living in Bristol increased 84,700 (19%), much higher than the England and Wales increase of just 6%.

- 3.9 The working age population, ages 16-64, in Bristol comprises 63% of the population compared to a national figure of 63%. The highest proportion being in the 20-34 year olds, who make up 30% compared to 20% nationally.. The number of older people aged 65 and over in Bristol comprises 13% of the local population, a much lower figure compared to the national average of 18%.

Table 3.1: 2016 Population estimates by age and sex

Source: ONS 2016 Mid-Year Population Estimates. Crown Copyright.

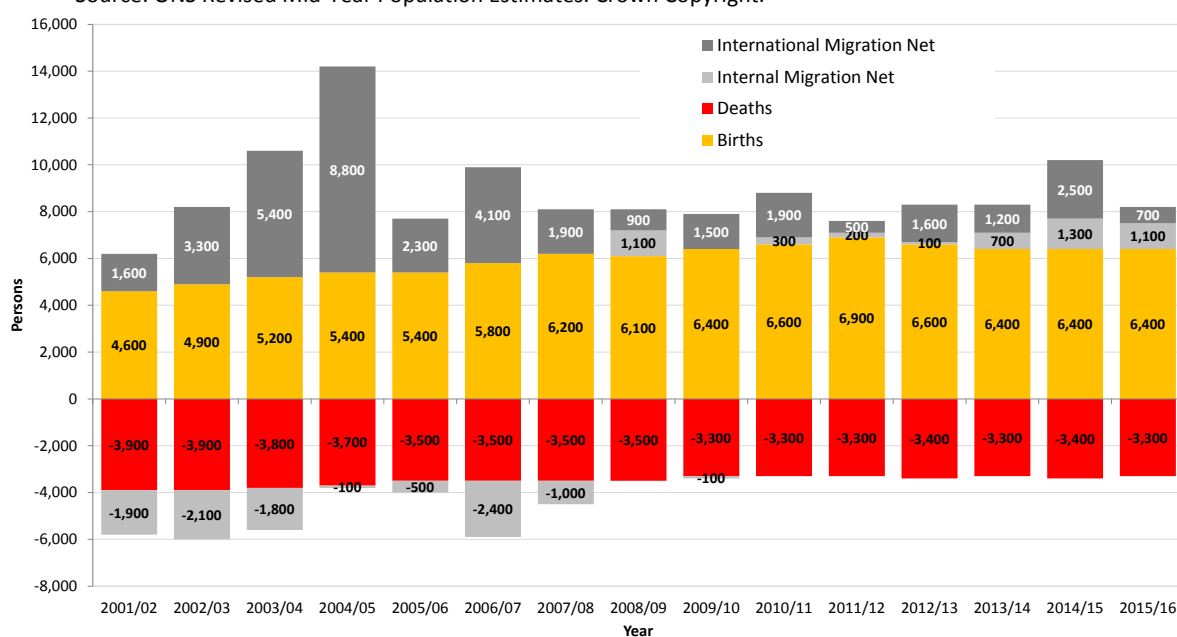
Age band	Males		Females		Persons		Change 2005-15	% change 2005-15
	Number	%	Number	%	Number	%		
0-15	0-15	43,100	19.0	41,600	18.4	84,700	11,700	16.2
16-24	16-24	35,000	15.4	35,700	15.7	70,700	5,800	9.0
25-49	25-49	89,900	39.5	83,400	36.8	173,200	170,500	11.1
50-64	50-64	32,700	14.4	33,300	14.7	66,000	65,300	10.0
65 +	65 +	26,900	11.8	32,700	14.4	59,600	59,300	6.2
All ages	All ages	227,400	100	226,800	100	454,200	43,900	10.8

Components of population change

- 3.10 Population growth in Bristol since 2001 has been generated by international in-migration, increasing numbers of births and decreasing numbers of deaths. There was a notable spike in international in-migration in 2004/5, the result of the Accession countries joining the European Union in 2004. In more recent years, natural change (births minus deaths) has contributed more than net migration to annual population change.

Figure 3.2: Components of population change in Bristol 2001/2 to 2015/16

Source: ONS Revised Mid-Year Population Estimates. Crown Copyright.



3.11 Figure 3.3 indicates that whilst there have been increases in population across most wards in Bristol between 2005 and 2015, there has been exceptional increases in the central area of Bristol, as well as several wards just outside the city centre. A contribution to this growth is the increase in student population (illustrated in Figure 3.4).

Figure 3.3: Population change 2006 to 2016 by 2016 ward

Source: Bristol City Council. Adapted from data from the ONS licensed under the Open Government Licence v1.0.

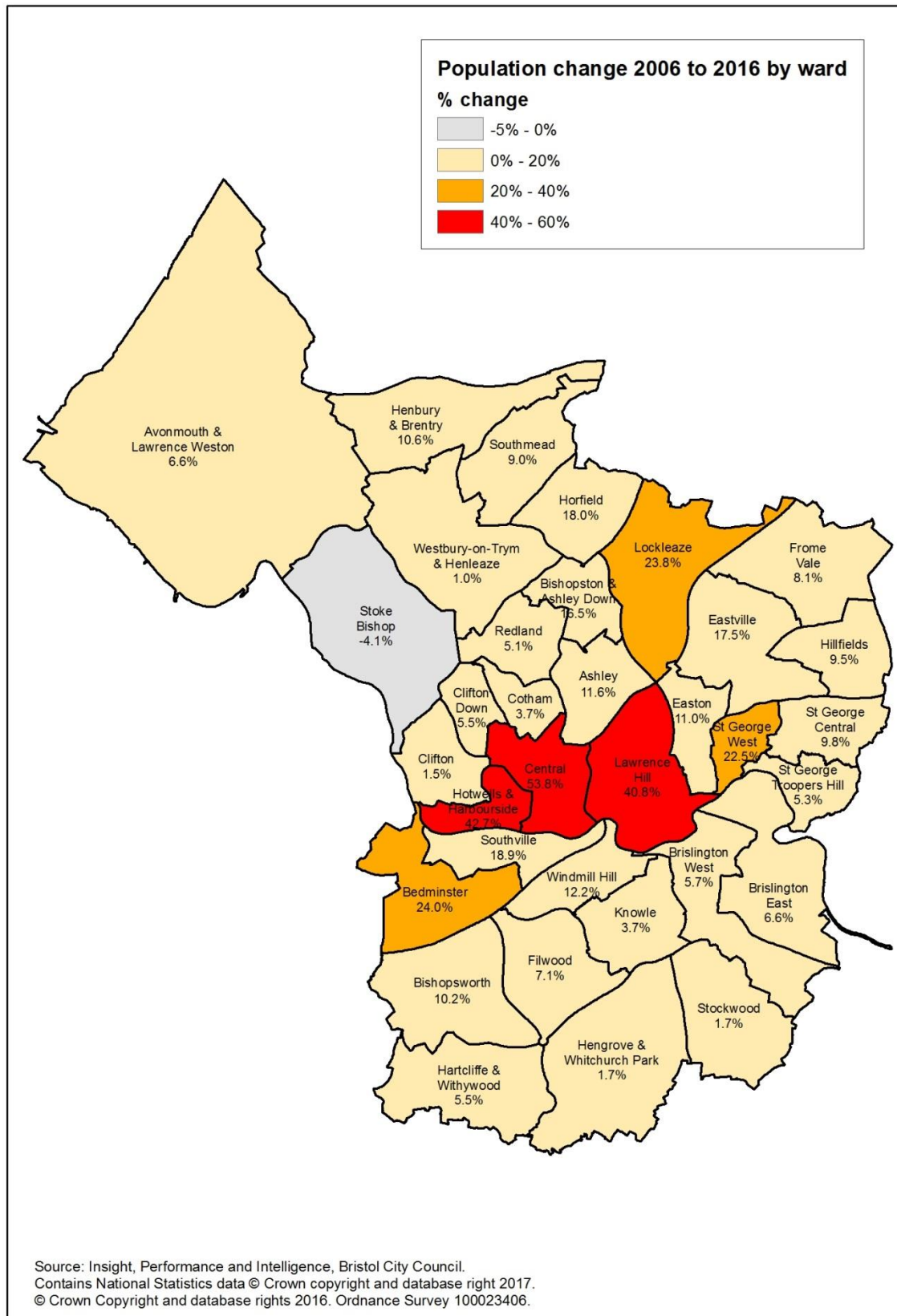
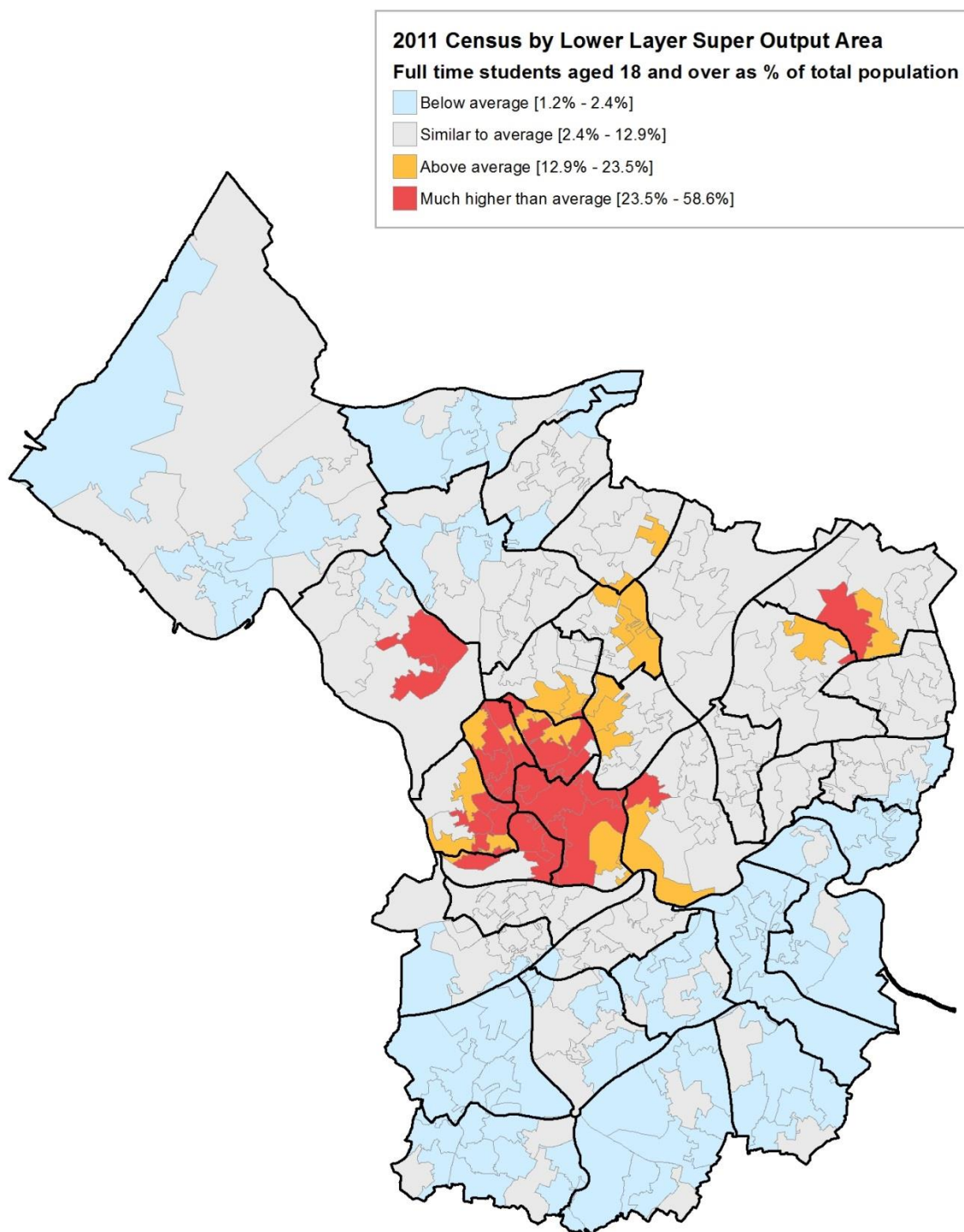


Figure 3.4: Full time students aged 18 and over living in Bristol during term time

Source: 2011 Census Office for National Statistics © Crown Copyright 2013 [from Nomis]



Produced by Strategic Planning, Bristol City Council
Source: Office for National Statistics © Crown Copyright 2013.
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Housing and Affordability

- 3.12 Average house prices in Bristol have increased by £44,100 over the last ten years, an increase of 29%. This compares with an increase of 16% for England and Wales over the same period⁴.

Table 3.2: Net housing completions 2006 – 2017

Source: BCC, Bristol Residential Development Survey 2017

Tenure	City Centre	Inner East	Northern Arc	Rest of Bristol	South Bristol	Total
a) "Large" sites	3,725	949	2,170	2,283	3,093	12,220
b) "Small" sites	408	397	401	1,454	1,166	3,826
c) "Other" housing	2,710	27	1	172	17	2,927
d) Conversions of existing dwelling leading to a gain (net)	90	306	281	874	566	2,117
Total gains (a+b+c+d)	6,933	1,679	2,853	4,783	4,842	21,090
e) Conversions of existing dwelling leading to a loss (net)	-33	-11	0	-46	-13	-103
f) Losses through changes of use	-23	-6	-9	-40	-14	-92
g) Demolitions	-30	-61	-423	-155	-346	-1,015
Total losses (e+f+g)	-86	-78	-432	-241	-373	-1,210
Net total (a+b+c+d+e+f+g)	6,847	1,601	2,421	4,542	4,469	19,880

- 3.13 Housing delivery is steadily increasing over the last 3 years after a dramatic dip in 2009. While not attaining the heights of the mid 2000's boom, it is clear that housing supply is increasing again. However, as Table 3.3 below indicates, the supply of affordable housing is not experiencing the same increase and has remained steady.

- 3.14 The introduction of additional permitted change of use rights in May 2013 has seen new residential units being developed in the city without the need for planning permission (subject to prior approval covering flooding, highways, transport issues and contamination). Between 30 May 2013 and 31, 31st March 2017, prior approval was given for 111 applications, providing 1,629 dwellings, of which 809 dwellings have been completed. Permitted developments account for approximately 10% of total net dwellings with planning permission.

Table 3.3: Gross affordable housing completions

Source: BCC, Strategic City Planning

Year	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
Total	443	583	553	402	365	290	102	240	180	199

⁴ Land Registry 2015

- 3.15 The majority of residential development within the city between 2007 and 2017 has been on previously developed land. In 2016/17, 92.7% or 1,900 gross new and converted dwellings were built on previously developed land which is an increase of 4.5% on the previous year. Since 09/06/10, private residential gardens are no longer treated as brownfield and are excluded from the definition of PDL in Annex 2 of the NPPF. This change has resulted in a lower number of housing completions on PDL since 2010/11.

Table 3.4: Percentage of new and converted dwellings on previously developed land

Source: BCC, Bristol Residential Survey 2016

2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
99.8%	98.05	95.6%	90.4%	90.7%	84.6%	86.3%	75.8%	88.2%	92.7%

Table 3.5: Percentage of new dwellings completed per annum

Source: BCC, Strategic City Planning

	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
Less than 30 dph	1%	3%	1%	0%	2%	3%	2%	4%	0%	1%
30 - 50 dph	8%	3%	2%	8%	3%	13%	14%	30%	9%	11%
More than 50 dph	91%	95%	96%	92%	94%	84%	84%	66%	91%	88%

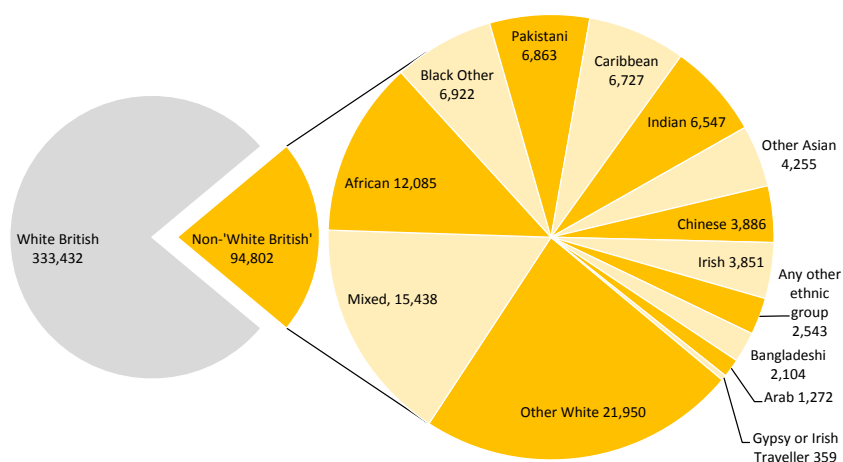
- 3.16 Since 2006, on average 90% of all dwellings completed achieved a density of over 50 dwellings per hectare, with a relatively constant year by year tally. Only where it is necessary to safeguard the intrinsic character of an area does the density drop below 50dph.

Ethnicity

- 3.17 The 2011 Census shows that over the last decade Bristol has become increasingly diverse. The proportion of the population who are not 'White British' has increased from 12% to 22% of the total population. The proportion of people living in Bristol who were not born in the UK has increased from 8% to 15% of the total population. In Bristol, there are now at least 45 religions, at least 187 countries of birth represented and at least 91 main languages spoken by people living in Bristol.

Figure 3.5: Population by ethnic group

Source: 2011 Census Office for National Statistics © Crown Copyright 2013 [from Nomis]



Health and Inequality

Deprivation

3.18 The Indices of Deprivation 2015 are the official measure of relative deprivation for small areas (2011 Lower Layer Super Output Areas) in England. The Indices of Deprivation rank every small area in England from 1 (most deprived area) to 32,844 (least deprived area). The Indices of Deprivation 2015 provide a set of relative measures of deprivation based on seven different domains of deprivation:

- Income Deprivation
- Employment Deprivation
- Education, Skills and Training Deprivation
- Health Deprivation and Disability
- Crime
- Barriers to Housing and Services
- Living Environment Deprivation

3.19 The Indices of Deprivation 2015 reinforce previously identified patterns of deprivation across the city. Bristol continues to have deprivation 'hot spots' that are amongst some of the most deprived areas in the country yet are adjacent to some of the least deprived areas in the country.

- 3.20 Since 2010, Bristol has on the whole seen a greater increase in levels of relative deprivation than the other English Core Cities, however, this was mostly from a less deprived starting point. Bristol still remains one of least deprived of the English Core Cities based on the Index of Multiple Deprivation 2015.
- 3.21 In Bristol 16% of residents - 69,000 people - live in the most deprived areas in England, including 17,800 children and 10,500 older people. This compares to 14% - 60,665 people – in 2010; and 16% - 65,000 people – in 2007. Bristol has 42 LSOAs in the most deprived 10% in England for Multiple Deprivation. Of these 42 LSOAs, there are 26 in the most deprived 5% in England and 6 in the most deprived 1% in England. The spread of measured deprivation across Bristol is shown in Figure 3.6.

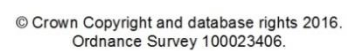
Education and Skills

- 3.22 Educational attainment for children and young people is rising steadily in Bristol, and GCSE results have now reached the national average⁵.
- 3.23 For GCSEs, 55% of pupils (Key Stage 4, in 2014) attained 5 GCSEs at grade C or above (including English and Maths), a point rise of 20% since 2008. For the first time, Bristol has now exceeded the national average (53.4%) and Core Cities (52.4%). But gaps in attainment remain across the city, with over 90% children achieving this in Redland & Clifton East, with only 35% in Lawrence Hill⁶.
- 3.24 46% of Bristol working age residents (aged 16 to 64) are qualified to degree level or above compared to the national average of 36%.
- 3.25 Bristol residents are more highly qualified than all the other Core Cities except Cardiff and is the third strongest academic cluster in the UK (after Oxford and Cambridge). 42% of graduates remained in the area in 2012.

⁵ <http://www.education.gov.uk/schools/performance>

⁶ Dept of Education, via Bristol City Council, 2014 results

Source: English Indices of Deprivation 2015, DCLG © Crown Copyright 2015



Health and Wellbeing

- 3.26 The Joint Strategic Needs Assessment⁷ highlights that, generally, the population of Bristol is healthy with 82% who feel in good health, similar to national average, and people are living longer
- 3.27 However, there are health and wellbeing inequalities across the city. Life expectancy has a persistent gap between the most and least deprived areas (an estimated gap of 8.9 years for men and 6.6 years for women, 2011-13). People spend years living in poor health, and there are worse health outcomes in deprived areas, and even when the trend for Bristol is improving, this may not be the case in all areas.
- 3.28 Life expectancy for women is 82.8 years (below national average of 83.1 but highest of English Core Cities) and for men 78.2 years (significantly below national average of 79.4, mid-rank of Core Cities).
- 3.29 Bristol's Healthy life expectancy (years living in good health) is women 62.6 years and men 63 years (similar to national and highest of Core Cities for both gender). On average women in Bristol spend only 76% of life in good health, and men 81%.
- 3.30 Many issues mirror national challenges, including mental health issues. Cancer is the biggest killer (under 75) followed by Cardiovascular Disease (heart related). Diabetes is rising. Early deaths due to Cancer are falling but remain significantly worse than national.
- 3.31 Over half (59%) people in Bristol are overweight or obese. For children, this is 23% of 4-5yr olds and 35% for 10-11yr olds (2013/14, similar to national).

Townscape and Landscape

Heritage

- 3.32 Bristol has a fine and historically rich built environment, including:
- 33 conservation areas
 - Over 90 historic parks and gardens
 - 4,140 listed buildings.
- 3.33 There are 9 listed buildings within the administrative boundary of Bristol City Council on the Historic England heritage at risk register. In addition, there are 4 places of worship, 4

⁷ www.bristol.gov.uk/jsna

archaeology entries and 1 conservation area. Whilst the Historic England list is concerned with buildings and sites of clearly national significance, the council has a local list that provides the opportunity to identify those features of the local scene that are particularly valued by communities as distinctive elements of the local historic environment.

Table 3.7: Amount of Listed Buildings in Bristol and on the ‘at risk’ register

Source: BCC, City Design

Changes to the conservation and historic environment				
	2013/14	2014/15	2015/16	2016/17
Number of listed buildings	4,130	4,131	4,137	4,140
Number of listed buildings in Bristol on the ‘at risk’ BCC register	HE 8 BCC 47	8 47	9 47	9 47

- 3.34 Both the risk registers now refer to ‘heritage at risk’ which also includes Scheduled Ancient Monuments and Conservation Areas. This increases the number to 50 heritage assets on the Bristol ‘at risk’ register.
- 3.35 A review of the city’s conservation areas has taken place through the production of character appraisals and a set of management proposals for each area. Seventeen character appraisals have been adopted, with an eighteenth close to adoption. Conservation area enhancement statements exist for the remaining areas.

Natural Environment

- 3.36 Bristol has 1564 ha of publically accessible parks and green spaces (only including areas of Ashton Court / Stoke Park / Frenchay Park Road that lie within the local authority boundary). There are currently 85 Sites of Nature Conservation Interest within Bristol and this remains largely unchanged since 2010. No new SNCI sites have been designated since the adoption of the Site Allocation and Development Management Policies Document in 2014, although there has been a marginal loss of some SNCI land.
- 3.37 There is also a rich biodiversity with 2 internationally important Natura 2000 sites (partly in Bristol), the Severn Estuary and the Avon Gorge Woodlands; 4 SSSI (Site of Special Scientific Interest) covering 182 h and; 1501 ha of corridors in the Wildlife Network. There are also 12 designated Local Nature Reserves, an increase from 7 in 2005.
- 3.38 The Bristol, Avon Valleys and Ridges National Character Area (NCA) includes the city with its historic port and the surrounding areas and comprises rich geomorphological features such as the Avon Gorge and other designated exposures.

Economy and Employment

- 3.39 During the first ten years around 245,000m² new office floor space was completed in Bristol with 78% located in the City Centre. However, during this period there were also significant losses through both office conversions to residential and student accommodation and demolitions to make way for redevelopment projects. Consequently around 34,500 m² net additional office floor space has been delivered.

Table 3.8: Gross B1a Office completions (m²) by Core Strategy Area 2006 - 2016

Source: BCC, Bristol Business Development Survey 2016

Area	Avonmouth & Bristol Port	Bristol City Centre	Inner East	Northern Arc	Other Areas	South Bristol	Total
2006/07	236	6,278	0	693	377	4,122	11,706
2007/08	6,135	45,068	0	227	885	0	52,315
2008/09	8,179	15,733	1,661	0	220	249	26,042
2009/10	1,244	75,087	0	0	1,507	0	77,838
2010/11	0	12,619	621	370	0	0	13,610
2011/12	0	9,928	0	0	0	0	9,928
2012/13	123	6,971	211	0	0	1,433	8,738
2013/14	0	4,721	200	0	6,107	11,545	22,573
2014/15	0	12,720	0	0	150	6159	19,029
2015/16	0	2,167	0	0	0	849	3,016
Total	15,917	191,292	2,693	1,290	9,246	24,357	244,795

- 3.40 514,984m² of new industrial and warehousing floor space was completed in Bristol. Of this 411,534m² was completed in Avonmouth, and just 103,450m² completed elsewhere in the city. In areas other than Avonmouth, losses have exceeded gains, leading to an overall net loss of 199,135m². This is mainly due to the redevelopment of secondary or redundant building stock as traditional industries cease to operate and other activities relocate to suburban locations such as Avonmouth.

Table 3.9: Gross B1b; B1c; B2; B8; Sui generis industrial floor space completed 2006-2016

Source: BCC, Bristol Business Development Survey 2016

Area	Avonmouth & Bristol Port	Bristol City Centre	Inner East	Northern Arc	Other Areas	South Bristol	Total
2006/07	10,137	0	0	0	691	5,807	16,635
2007/08	91,461	0	0	223	6,506	13,574	111,764
2008/09	92,592	0	2,170	0	1,761	3,210	99,733
2009/10	6,615	0	412	0	0	771	7,798
2010/11	29,913	0	0	316	836	350	31,415
2011/12	3,906	1,066	1,059	161	0	1,764	7,956
2012/13	51,828	0	5,853	0	0	1,297	58,978
2013/14	83,418	600	3,171	0	3,978	4,206	95,373
2014/15	0	0	0	36,238	0	3,999	40,237
2015/16	41,664	0	523	2,540	0	368	45,065
Total	411,534	1,666	13,188	39,478	13,772	35,346	514,984

Transport and Movement

- 3.41 As shown in Table 3.10, cycle use in Bristol continues to grow, as does bus and train use, however, road accidents continue to rise, although there has been a sharp drop in 2017. Further to this, almost a fifth (19.3%) of Bristol residents walk to work⁸.
- 3.42 The Government replaced the National Indicators introduced in 2008 and the previously mandatory Local Transport Indicators with a 'Single Data List' of local government data requirements as from April 2011. It is open for local authorities to supplement these with local indicators so that we are accountable locally. The Joint Local Transport Plan's cycling indicator (LTP3) was re-based in 2012 to make the target more stretching, in recognition of the strong growth in cycling observed.

Table 3.10: Joint Local Transport Plan Targets

Source: BCC, Transport Planning

Joint Local Transport Plan Indicator LTP3							
Number of cycling trips	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
	114	129	143	Not data	166	182	199

Indicator	Target	Performance 2013/14	Performance 2014/15	Performance 2015/16	Performance 2016/17
Road Safety	30% reduction in KSIs (Killed or Seriously Injured casualties) by 2020, compared to the 2005-09 average.	106 (Target 142)	120 (Target 133)	133 (Target 124)	107 (Target 115)
CO ₂	16% reduction by 2020	10%	8%	8%	Data not yet available
Cycling	76% increase by 2016	No data available	66%	82%	99%
Bus Passengers	11% by 2015/16	4%	23%	34%	41%
Rail	41% increase by 2019	41%	41%	58%	56%

Climate, Energy and Waste

Air Quality

- 3.43 The indicators used for reporting air quality have been selected to reflect the pollutants of most concern (nitrogen dioxide and PM₁₀)⁹ and to use the metrics that are also employed to describe the local authority's performance in managing air quality in the Local Air Quality Management regime. The monitoring sites selected are from Bristol City Council's network of analysers and from the Defra AURN site in St. Pauls. An Air Quality Management Area (AQMA) is declared for both PM₁₀ and NO₂.

⁸ Bristol Quality of Life survey 2014 / 2013

⁹ PM₁₀ is defined as particulate matter with a mean aerodynamic diameter of 10 micrometres (µm)

- 3.44 The trends in nitrogen appear to be moving slightly downwards from 1998 to 2015 at the majority of sites, although did show a rise in 2016. Table 3.11 gives a summary plot of nitrogen dioxide concentrations at all the continuous monitoring sites measured in micrograms per cubic metre of air ($\mu\text{g}/\text{m}^3$)

Table 3.11: Air quality: annual mean nitrogen dioxide $\mu\text{g}/\text{m}^3$

Source: BCC, Sustainable City

Site	Type	2012	2013	2014	2015	2016
Brislington Depot	Urban Background	35.7	34.3	31.4	31.2	27.9
Parson Street	Roadside	47.9	50.8	45.7	44.2	46.1
Wells Road	Kerbside	41.2	39.0	40.5	39.3	41.5
AURN St. Pauls	Urban Background	31.5	28.2	26.3	25.8	26.9
Fishponds	Roadside	39.5	37.7	43.3	39.7	42.7
PM ₁₀ : Number of Exceedences of 24-Hour Mean (50 $\mu\text{g}/\text{m}^3$)						
AURN St. Pauls	background	8	3	4	3	5

- 3.45 It is now understood that increased penetration of diesel vehicles in the fleet and the under-performance of vehicles in relation to their type approval under the EURO test cycles have led to concentrations of NO₂ and PM₁₀ in the UK remaining broadly stable for the last ten years or so.

Flood Risk

- 3.46 Risk of flooding within Bristol comes in the form of fluvial; surface water; groundwater and; tidal flooding, each presenting distinct and specific issues. Bristol City Council information¹⁰ shows that approximately 29,000 residential properties are at risk of surface water flooding during, which indicates a strong threat of flooding during very heavy rainfall events. As such, the Environment Agency recognises Bristol as on the UK's 10 Flood Risk Areas susceptible to surface water flooding and the Surface Water Management Plan (2012) also identifies several High Risk areas within Bristol.
- 3.47 Roughly 1000 properties are at Risk to tidal flooding, where the most significant risk of flooding is in the city centre from the River Avon. Climate change will increase this risk over the next 100 years to around 4000 properties. Flood prevention measures undertaken across the city have reduced to risk of fluvial flooding to large parts of the city, but threat of flooding still exists across the river network. The risk of groundwater flooding is considered to be low in comparison to other sources.

¹⁰ Bristol's Local Flood risk Management Strategy (2014)

Water Quality

- 3.48 The indicators reflect general water quality which can deteriorate significantly after rainfall and may be inferior in some places where there are problems with drainage or historical landfill. Measurements are taken monthly and the findings are reported using the past three years' data. This process generally takes place at the beginning of the calendar year.
- 3.49 Bristol's classification tool is a locally derived quality assessment based on the Water Framework Directive's classification system. Table 3.12 below shows local water framework directive classifications derived using council data at sample sites within Bristol. They are a measure of general ecological water quality along the length of the river. Data shows a decline in water quality in the city, with both Brislington Brook and The River Malago/Pigeonhouse Stream showing a decline from Moderate status.

Table 3.12: Bristol's water quality based on locally derived Water Framework Directive Ecological Classification 2016

Source: BCC, The Sustainability Service

Classification tools by special licence ref: Z18002 from the Environment Agency

River	Locally derived Water Framework Directive Ecological Classification 2016 (Based on data 2013-2016)
River Trym & Hazel Brook (Coombe Dingle)	Moderate
Colliter's Brook (Silbury Lane)	Moderate
River Malago & Pigeonhouse Stream	Poor
Brislington Brook	Bad
River Frome	Moderate
River Avon	Moderate
Floating Harbour (Baltic Wharf)	Moderate
% of rivers in Good ecological status	0%
% of rivers in Moderate ecological status	72%
% of rivers in Poor ecological status	14%
% of rivers in Bad ecological status	14%

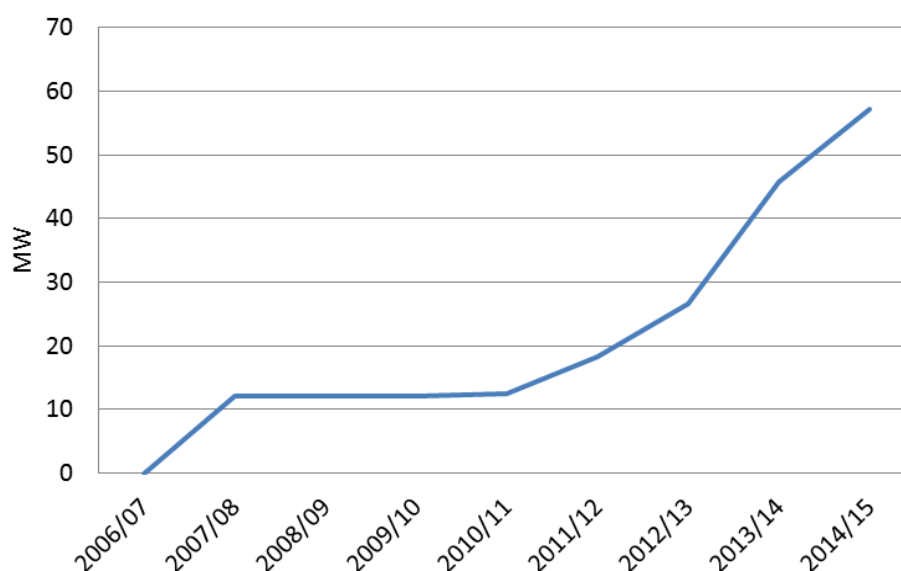
Energy

- 3.50 During 2014/15, the number of renewable energy installations has again risen from 2,886 to 3,254. The increased installed renewable electricity capacity between 2013/14 and 2014/15 is mainly as a result of four new wind turbines commissioned at Wessex Waters sewage treatment plant.
- 3.51 Although the solar photovoltaics output in Bristol has again increased in 2014/15. The increase has slowed to around 0.585 MW. Between 2012/13 and 2013/14 the increase was 3.012 MW. The number and output (MW) in terms of renewable electricity capacity has increased significantly over the last 10 years, accounting for 12.01 MW to 3,254 projects accounting for 57.17 MW #.

- 3.52 In the same period, renewable heat projects installed in Bristol had a combined renewable heat capacity of 20.45 MW (increasing again from 19.936 MW in 2013/14). The slight increase was related to an increase in Biomass output capacity.

Figure 3.7: Installed renewable energy capacity over the plan period (MW)

Source: BCC Sustainable City Team



Waste

- 3.53 As demonstrated in Table 3.13 and 3.14 there is been an improvement in both the amount of waste being generated per household and how much of that waste is being recycled rather than landfilled over the last several years, although 2017 does show a slight decline. This is despite a growing total population creating a higher level of overall waste.

Table 3.13: Overall domestic waste generation

Source: BCC, Waste Disposal Authority

Domestic Waste					
	2012/13	2013/14	2014/15	2015/16	2016/17
Total domestic waste (tonnes)	148,960	158,130	161,920	165,100	185,326
% Domestic waste recycled	30.1%	26.9%	27.9%	33.8%	30%
% Domestic waste composted	19.6%	15.4%	17.1%	17.3%	13%

Table 3.14: Rates of waste per household

Source: BCC, Waste Disposal Authority

Performance Indicators					
	2012/13	2013/14	2014/15	2015/16	2016/17
Residual household waste per household	205.9kg	260.7kg	250.6kg	237.9kg	230.0kg
Percentage of household waste sent for reuse, recycling and composting	49.8%	44.1%	45%	46.2%	44.7%
Percentage of municipal waste landfilled	25.9%	31.3%	29.3%	27.5%	26.6%

4. Identifying sustainability issues

Through the analysis of baseline data, the following sustainability issues have been identified in Table 4.1.

Table 4.1: Key Sustainability Issues Arising from Baseline Data Analysis

SEA Topic(s)	Scoping Report Topic	Sustainability Issues	Likely Evolution without the Plan
(b) population; (c) human health;	Population, Housing and Communities	<p>A growing population above the national average, leading to a high demand for new housing in an area with limited land supply</p> <p>A diverse population formed by communities with different needs, who require access a range of different services</p> <p>Average wages compared to average house prices make access to the property market unattainable for many.</p> <p>Concentrated population growth with a rapidly growing population in the central areas of Bristol, with subsequent increasing population densities.</p> <p>Large and growing student population which could potentially create further competition with the available housing stock</p>	<p>A less co-ordinated approach to housing delivery and risk of development not being directed to areas where it is needed most</p> <p>Undersupply of housing and affordable housing</p> <p>Services and infrastructure falling behind population growth, leading to communities without access to required infrastructure and services</p>

SEA Topic(s)	Scoping Report Topic	Sustainability Issues	Likely Evolution without the Plan
(b) population; (c) human health;	Health and Inequalities	<p>Bristol contains some of the most deprived areas in the country, scoring low ranks in Indices of Deprivation.</p> <p>High rate of obesity in the city</p> <p>Life expectancy is generally lower than the national average</p> <p>Disparity across the city in terms of educational attainment, with deprived areas well below the national average</p> <p>While overall crime has dropped, the rate of violent crime and incidents of domestic abuse has risen, particularly in areas of deprivation</p> <p>Child poverty and fuel poverty continue to be higher than the national average</p>	<p>The Local Plan can ensure the built environment contributes to delivering health benefits, and supports healthy, inclusive and active communities. Without a Plan in place development is less likely to deliver health benefits.</p> <p>Potential negative effects on access to the right type of services, including health centres</p> <p>Without strategic targeting, the most deprived areas could see no reduction of deprivation.</p>
(b) population; (c) human health;	Economy and Employment	<p>Pressure on city centre land to meet the needs of commercial and residential space</p>	<p>Less co-ordinated approach to new employment and commercial infrastructure, leading to poor access to employment opportunities</p>

SEA Topic(s)	Scoping Report Topic	Sustainability Issues	Likely Evolution without the Plan
(a) biodiversity; (d) fauna; (e) flora; (f) soil; (k)cultural heritage (l) landscape;	Townscape and Landscape	<p>Balancing the need for providing new residential and commercial development with retaining the character of Bristol's varied townscape and green infrastructure</p> <p>Bristol contains a substantial number of designated heritage assets</p> <p>Green and Blue infrastructure is a critical provision for a range of habitats and species, as well as the human population</p> <p>Ensuring significant green infrastructure assets are retained</p>	<p>Lack of local protection could lead to potential degradation of valued landscape and heritage assets</p> <p>No strategic oversight could lead to inappropriate greenfield development, damaging the city's green infrastructure and loss of valuable habitats and species</p>
(b) population; (c) human health;	Transport and Movement	<p>Ensuring that new development is in accessible locations that reduce the need to travel</p> <p>Ensuring that growth is integrated with new transport infrastructure, such as Metrobus</p> <p>Congestion continues to impede movement, particularly in the city centre</p> <p>Continuing to supply the required infrastructure to meet the needs of a modal shift to sustainable</p>	<p>A less strategic overview of development and infrastructure delivery may exacerbate exiting congestion issues</p> <p>Necessary highway infrastructure may not be strategically implemented, leading to an under capacity in the road network, for all road users</p>

SEA Topic(s)	Scoping Report Topic	Sustainability Issues	Likely Evolution without the Plan
		transport, particularly future transport modes	
(c) human health; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets;	Climate, Energy and Waste	<p>Traffic continues to compromise air quality in AQMA, being the biggest contributor to exceedances</p> <p>High flood risk areas situated around existing water courses, and areas at risk of surface water flooding, particularly in the city centre and at Avonmouth</p> <p>Increased pressure on water resources particularly in as a result of high population density</p> <p>Adapting to potential effects of climate change, including flooding, sea level rise and urban heat island effect</p> <p>Reducing non-renewable energy use</p> <p>Continuing to reduce waste being landfilled</p> <p>Bring up water quality to a 'good' rating</p>	<p>Without a co-ordinated strategic approach to development and infrastructure, existing issues of air and water quality may be exacerbated</p> <p>Potential risks of inappropriately located development within flood zones</p> <p>Planning policy is currently the only tool for the delivery of renewable energy technology and sustainable design (eg SuDs) in new development. The Local Plan can provide further support in the long-term approach to climate change mitigation and adaption and setting aspirational energy efficiency targets for new development. Without the Plan therefore, development may be less ambitious in its energy performance, and planning gains are less likely to be delivered in a timely and coordinated manner.</p>

5. The Sustainability Appraisal Framework

- 5.1 The SA Framework provides the basis by which the sustainability effects of the Bristol Local Plan will be described and evaluated. It includes a number of objectives, elaborated by decision making criteria that are relevant to the objectives of the Local Plan and sustainable development. These objectives have been identified through the SA Scoping Stage and from the information collated in the plans and programmes review, baseline information and key sustainability issues. The SA from the emerging Joint Spatial Plan has also been considered and assimilated where appropriate. The Strategic SA Framework is presented in Table 5.2 below.
- 5.2 It is important to note that these objectives are not decision-making criteria; information provided through the Sustainability Appraisal will be used to inform those making decisions.
- 5.3 Each of the sites and the proposed uses will be appraised against the sustainability objectives using the following scoring:

Table 5.1: Categories of Significance

Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

- 5.4 Further detail of how each Sustainability objective will be specifically assessed, such as set distance standards for access, will be provided in the full SA report. Also, the next stage will further clarify the objective of the Bristol Local Plan and what constitutes a 'reasonable alternative' as required by the SEA Directive.
- 5.5 The SA will cover all land and water within the Bristol City Council boundary and the possible direct and indirect effects that arise from adjoining Local Authorities – North Somerset; South Gloucestershire and Bath and North East Somerset. This will include multi-directional transboundary effects.

- 5.6 The nature of the likely sustainability effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) will be described in the appraisal commentary, together with any assumptions or uncertainties. Where necessary, the SA will make suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement. The appraisal will be undertaken using professional judgment, supported by the baseline information and wider evidence base. A summary appraisal commentary will be provided to set out any significant effects identified for individual options, along with suggestions for mitigation or enhancement to be made where relevant.
- 5.7 The Local Plan will span the 20 year period of 2016 to 2036 and the SA will assess potential impacts within the same period. There will be elements of the Local Plan that will be expected to endure beyond the plan period (such as Green Belt designation), which the SA will also pick up. As part of the evaluation against SA objectives, impacts will be categorised into short (>5 years); medium (5-15 years) and; long (<15 years) term time periods in accordance with SEA regulation
- 5.8 The main Sustainability Appraisal report will be accompanied by a document which summarises the main findings; this will be called the Non-Technical Summary and published for consultation alongside the Local Plan.
- 5.9 The report will include:
- an update of the baseline situation;
 - an update of the review of relevant plans and programmes;
 - an appraisal of the options for the allocation of sites and policies, which will identify potential significant negative and positive effects;
 - recommendations and suggestions for mitigation to avoid, reduce, or compensate for the negative effects identified and enhance positive effects where possible; and
 - suggested indicators for monitoring significant negative effects.
- 5.10 The Conservation of Habitats and Species Regulations (as amended) (2010) [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 nature conservation objectives of any site designated for its nature conservation importance. The HRA of the Local Plan will be undertaken alongside the SA with the findings of the HRA informing the SA. The methods and findings of the HRA process will be reported separately and be sent to the statutory consultee (Natural England) and placed on consultation for the wider public alongside the SA and the emerging Local Plan.

Table 5.2: Developing the Sustainability Objectives

Topic	Key Sustainability Issue	Sustainability Objective	How the objective will be used
Population, Housing and Communities SEA Directive Topic(s): (b) population; (c) human health;	A growing population above the national average, leading to a high demand for new housing in an area with limited land supply A diverse population formed by communities with different needs, who require access a range of different services Average wages compared to average house prices make access to the property market unattainable for many. Concentrated population growth with a rapidly growing population in the central areas of Bristol, with subsequent increasing population densities. Large and growing student population which could potentially create further competition with the available housing stock	1. Ensure an adequate and diverse supply of housing that is affordable to everyone	Would development provide sufficient housing to meet the identified needs of all communities within the city? Would development provide an appropriate mix of types of housing to meet the identified needs of all communities within the city?
		2. Promote the conservation and wise use of land, maximising the re-use of previously developed land	Would development result in the loss of greenfield land? Would development provide an opportunity for the reuse or regeneration of previously developed land and/or increase in density?
		3. Ensure easy and affordable access to key services	Would development result in a net gain of community or service facilities?
		4. Increase participation in cultural and community activities	Would development be ensured to be within easy walking distance of key services (eg GP, Post office, community centre)?

Topic	Key Sustainability Issue	Sustainability Objective	How the objective will be used
<p>Health and Inequalities</p> <p>SEA Directive Topic(s):</p> <p>(b) population;</p> <p>(c) human health;</p>	<p>Bristol contains some of the most deprived areas in the country, scoring low ranks in multiple deprivation indices. Although there has been a relative reduction in deprivation, this has not been at the same rate as other parts of the country</p> <p>High rate of obesity in the city and life expectancy is generally lower than the national average</p> <p>Disparity across the city in terms of educational attainment, with deprived areas well below the national average</p> <p>While overall crime has dropped, the rate of violent crime and incidents of domestic abuse has risen, particularly in areas of deprivation</p> <p>Child poverty and fuel poverty continue to be higher than the national average</p>	5. Reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage	<p>Would development result in an improved built environment for deprived areas?</p> <p>Would development offer potential for regeneration or investment in deprived areas?</p>
		6. Reduce health inequalities and promote healthy lifestyles across the city	<p>Would development contribute to positive wellbeing, e.g. access to open space and pleasant surroundings and living conditions, freedom from noise and pollution?</p> <p>Would development make walking and cycling easy and attractive as routine methods of transport, and also facilities healthy eating choices?</p>
		7. Ensure access to education and learning for all sections of society	<p>Would development result in a net gain of educational facilities?</p> <p>Would development be ensured to be within easy walking distance of educational services?</p>

Topic	Key Sustainability Issue	Sustainability Objective	How the objective will be used
Economy and Employment SEA Directive Topic(s): (b) population; (c) human health;	Unemployment rates sit above national averages Pressure on city centre land to meet the needs of commercial and residential space	8. To support the economy and ensure that there are suitable opportunities for employment	Would development provide a range of high quality employment land to meet the identified needs of all communities within the city Would development regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment? Would development result in the loss of any existing strategic employment opportunities?
		9. Ensure access to a range of shopping facilities for all sections of society	Would development offer the opportunity to support and enhance the vitality and viability of retail centres? Would development be ensured to be within easy walking distance of retail services?
Townscape and Landscape SEA Directive Topic(s): (a) biodiversity;	Balancing the need for providing new residential and commercial development with retaining the character of Bristol's varied townscape and green infrastructure Bristol contains a substantial amount of	10. To ensure the protection and enhancement of the historic environment and its setting	Would development result in the degradation of heritage assets?

Topic	Key Sustainability Issue	Sustainability Objective	How the objective will be used
(d) fauna; (e) flora; (f) soil; (k)cultural heritage (l) landscape;	designated heritage assets	11. To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats	Would development result in the degradation of biological and geological assets?
	Green and Blue infrastructure is a critical provision for a range of habitats and species, as well as the human population Ensuring significant green infrastructure assets are retained	12. To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation	Would development offer the opportunity to enhance or result in a net gain to GI?
Transport and Movement SEA Directive Topic(s): (b) population; (c) human health;	Ensuring that new development is in accessible locations that reduce the need to travel Ensuring that growth is integrated with new transport infrastructure, such as Metrobus Congestion continues to impede movement, particularly in the city centre Continuing to supply the required infrastructure to meet the needs of a modal shift to sustainable transport, particularly future transport modes	13. To encourage a demonstrable modal shift and reduce the need to travel	Would development offer an opportunity to improve access to and quality of sustainable transport modes for all communities, to allow sustainable movement throughout the city Would development offer an opportunity to support the delivery of new transport infrastructure
		14. To maintain and improve the existing highway network	Would development likely bring an increase in levels of traffic, and is this in an area already experiencing congestion issues? Would development offer an opportunity to enhance or improve the existing network?

Topic	Key Sustainability Issue	Sustainability Objective	How the objective will be used
Climate, Energy and Waste SEA Directive Topic(s): (c) human health; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets;	Traffic continues to compromise air quality in AQMA, being the biggest contributor to exceedances	15. To reduce the risk of flooding from all sources.	Would development be directed towards lower flood risk areas or offer opportunities to significantly reduce flood risk? Would development promote the use of sustainable drainage systems?
	High flood risk areas situated around existing water courses, and areas at risk of surface water flooding, particularly in the city centre and at Avonmouth	16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled.	Would development have an effect on water resources? Would development likely have an effect on water quality and would it provide opportunity to improve water quality?
	Increased pressure on water resources particularly in as a result of high population density	17. Minimise air and noise pollution	Would development minimise exposure to pollution or offer opportunity to reduce pollution?
	Adapting to potential effects of climate change, including flooding, sea level rise and urban heat island effect Reducing non-renewable energy use Continuing to reduce waste being landfilled Bring up water quality to a 'good' rating	18. To maximise the potential for energy efficiency, reduce greenhouse gas emission and ensure that the built and natural environment and its communities can withstand the effects of climate change	Would aspirational targets for energy efficiency in new development be set? Would development provide opportunities for a net gain in renewable energy production within the Plan area? Does the option ensure that new development is resilient to the effects of climate change?

6. Consultation

- 6.1 The SA Scoping Report sets out the process that will be undertaken and will be published on the Bristol City Council website for public consultation in February. The Report will be subject to consultation with the SEA statutory bodies; Historic England, the Environment Agency, and Natural England; as well as neighbouring Local Authorities in Bath and Northeast Somerset; South Gloucestershire and North Somerset.
- 6.2 The Draft SA Scoping Report was consulted upon in March 2016. The response from Natural England is attached as Appendix B. No other comment was received.
- 6.3 Any consultation responses received will be considered and inform the the formal Sustainability Appraisal report that will accompany the draft version of the Local Plan.

Appendix A - Policies, plans and programmes relevant to the LPR

Plan or programme	Key objectives of the plan or programme	Implications to the Local Plan	Implications to the SA
National Plans			
<i>National Planning Policy Framework (2012)</i>	<p>Presumption in favour of sustainable development. Delivering sustainable development by:</p> <ul style="list-style-type: none"> • Building a strong, competitive economy • Ensuring vitality of town centres • Promoting sustainable transport • Supporting high quality communications infrastructure • Delivering a wide choice of high quality homes • Requiring good design • Promoting healthy communities • Meeting the challenge of climate change, flooding, and coastal change. • Conserving and enhancing the natural environment • Conserving and enhancing the historic environment • Facilitating the use of sustainable materials 	Set the current national level of planning policy that Local Plan must conform to.	Sustainability appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.
<i>National Planning Policy Guidance</i>	<p>Provides further guidance to be read alongside the NPPF on a range of topics that link to the promotion of sustainable development including:</p> <ul style="list-style-type: none"> • Air quality • Climate change • Conserving and enhancing the historic environment • Flood risk • Health and well being • Housing and economic development • Natural environment • Minerals • Rural housing • Open space • Transport • Waste • Water supply, wastewater and water quality 	Expands on policy, giving further guidance and clarity on the creation of Local Plans	As above

<i>Marine Plan Policy Statement (2011) and Emerging South West Marine Plan</i>	<p>Provides the framework for managing coastal marine planning with emphasis on such topics as:</p> <ul style="list-style-type: none"> • Fishing • Dredging licences • Tourism • Energy provision • Marine conservation • Port based economies 	There is an overlap of authority boundary with Bristol and the marine plan, with much of the River Avon and intertidal areas coming under both authorities remit. Potential influences on Bristol port at Avonmouth.	A wider understanding of how coastal policy will affect local land policy is necessary.
<i>Localism Act (2011)</i>	<p>The aim of the act was to devolve more decision making powers from central government back into the hands of individuals, communities and councils. The key measures of the act were grouped under four main headings;</p> <ul style="list-style-type: none"> • new freedoms and flexibilities for local government • new rights and powers for communities and individuals • reform to make the planning system more democratic and more effective reform to ensure decisions about housing are taken locally 	Imposed CIL, allows for neighbourhood Plans.	Sustainability objectives to be included with regard to social inclusion and communities.
<i>Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)</i>	<p>The strategy aims to guide conservation efforts in England up to 2020, and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors:</p> <ul style="list-style-type: none"> • Agriculture • Forestry • Planning and Development • Water Management • Marine Management • Fisheries • Air Pollution • Invasive Non-Native Species 	Interprets international regulation and provides strategic guidance in delivering biodiversity gain. Policies developed should take account of this guidance.	Sustainability objectives to be included that account for biodiversity needs.
<i>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)</i>	<ul style="list-style-type: none"> • Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life. • Render polluting emissions harmless 	Develop policies that meet standards of air quality.	Sustainability objectives that seek to improve air quality

<p><i>National Planning Policy for Waste (2014)</i></p>	<p>Key planning objectives are identified within National Planning Policy for Waste, requiring planning authorities to:</p> <ul style="list-style-type: none"> • help deliver sustainable development through driving waste management up the waste hierarchy • Ensure waste management is considered alongside other spatial planning concerns • provide a framework in which communities take more responsibility for their own waste • help secure the recovery or disposal of waste without endangering human health and without harming the environment, • ensure the design and layout of new development supports sustainable waste management 	<p>Policies that promote sustainable waste management should be developed.</p>	<p>Sustainability objective that takes account of sustainable waste management.</p>
<p><i>Planning Policy for Traveller Sites (2015)</i></p>	<p>Government's aims in respect of traveller sites are:</p> <ul style="list-style-type: none"> • That local planning authorities should make their own assessment of need for the purposes of planning • To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites • To encourage local planning authorities to plan for sites over a reasonable timescale • That plan-making and decision-taking should protect Green Belt from inappropriate development • To promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites • That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies • To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply • To reduce tensions between settled and traveller communities in plan-making and planning decisions • To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. • For local planning authorities to have due regard to the protection of local amenity and local environment 	<p>Develop policies that account for the requirements and ensure needs assessment is up to date.</p>	<p>Sustainability objectives that relate to social inclusion and housing needs.</p>

<i>Flood and Water Management Act (2010)</i>	<ul style="list-style-type: none"> • provides for better, more comprehensive management of flood risk for people, homes and businesses • helps safeguard community groups from unaffordable rises in surface water drainage charges • protects water supplies to the consumer • designation of structures and features for flood and coastal erosion risk management purposes • designation of third party structures and features for flood and coastal erosion risk management purposes • surface water drainage charges 	Policies that ensure protection of areas at risk of flooding and promote the reduction of flood risk.	Sustainability objective that focusses on flood risk.
<i>Safeguarding our Soils (2009)</i>	<p>The Strategy highlights the areas for priority including:</p> <ul style="list-style-type: none"> • Better protection for agricultural soils • Protecting and enhancing stores of soil carbon • Building the resilience of soils to a changing climate • Preventing soil pollution • Effective soil protection during construction and development • Dealing with our legacy of contaminated land 	Develop policies that promote brownfield / previously developed land sites for development. Protection of important open spaces / land.	Sustainability objectives that seek to protect important greenfield land.
<i>DEFRA Securing the Future: Delivering UK Sustainable Development Strategy (2011)</i>	<p>Enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. There are 4 shared priorities:</p> <ul style="list-style-type: none"> • sustainable consumption and production • climate change and energy • natural resource protection and environmental enhancement • sustainable communities 	Develop policies that meet sustainable development aims.	Sustainability objectives that cover the priorities of sustainable development. Would cross over multiple topic areas.

<p><i>The National Adaptation Programme – Making the Country Resilient to a Changing Climate (2013)</i></p>	<p>The report sets out visions for the following sectors:</p> <ul style="list-style-type: none"> • Built Environment – “buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change” • Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate” • Healthy and resilient communities – “a health service, a public health and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate change. Emergency services and local resilience capability take account of and are resilient to, a changing climate” • Agriculture and Forestry – “profitable and productive agriculture and forestry sectors that take the opportunities from climate change, are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity” • Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides” • Business – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change” • Local Government – “Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate” 	<p>Develop policies that account for resiliency aims, would be a cross cutting theme over multiple subjects.</p>	<p>Sustainability objectives that seek a better adaptation to climate change, including mitigations of climate change.</p>
<p><i>Historic England Corporate Plan 2016-2019</i></p>	<ul style="list-style-type: none"> • Aim 1: Champion England’s historic environment • Aim 2: Identify and protect England’s special historic buildings and places • Aim 3: Promote change that safeguards historic buildings and places • Aim 4: Help those who care for historic buildings and places, including owners, local authorities, communities and volunteers • Aim 5: Engage with the whole community to foster the widest possible sense of ownership of our national inheritance of buildings and places • Aim 6: Support the work of the English Heritage Trust in managing and safeguarding the National Heritage Collection of buildings and monuments and to achieve financial self-sufficiency • Aim 7: Work effectively, efficiently and transparently 	<p>Develop policy that protects important heritage assets.</p>	<p>Sustainability objectives that consider the contribution of historical assets to the built environment, as well as, benefits to community/social inclusion.</p>

<i>Landscape character assessments: identify and describe landscape types (2014)</i>	<p>You can prepare an LCA to inform a wide range of activities, such as:</p> <ul style="list-style-type: none"> • planning policies and decisions • sensitivity and capacity studies • land management plans • landscape and visual impact assessments • local council studies • minerals planning • place making • green infrastructure • agri-environment schemes • forest and woodland strategies • waterways strategies • renewable energy • national park management plans 	Develop policies that take account of aims and cross-cutting themes.	Sustainability objective that recognise important landscape features and protect and improve access to important open space.
Regional and Sub-regional			
<i>Joint Spatial Plan (Emerging)</i>	<p>Strategic priorities:</p> <ul style="list-style-type: none"> • Economic: To identify and meet the need for housing and accommodate the economic growth objectives of the LEP Strategic Economic Plan • Social: To ensure that the JSP benefits all sections of our communities • Environment: To protect and enhance the sub-region's diverse and high quality environment and ensuring resilience including through protection against flood risk • Infrastructure: To ensure a spatial strategy where new development is properly aligned with infrastructure 	The JSP will provide the strategic context covering the period 2018 to 2036, which the new Plan will need to comply with. What this means is that the amount and locations of new housing and employment set out in the JSP which relate to Bristol will need to be included in and delivered through the Plan.	Basis for sustainability appraisal objective setting with many shared issues. Must be taken into consideration as the SA is carried out.
<i>Joint Transport Plan (Emerging)</i>	To provide strategic transport infrastructure in support of the JSP	Will feed into JSP policy and, therefore, into Local Plan.	As above

<i>Joint Waste Core Strategy</i> (2011)	<ul style="list-style-type: none"> • To move the management of waste up the waste hierarchy by increasing waste minimisation, recycling and composting then recovering further value from any remaining waste, and only looking to landfill for the disposal of pre-treated waste • To help enable communities and businesses in the West of England to take responsibility for the waste they generate • To continue to promote public awareness towards a shared commitment to waste prevention and reuse • To deliver the timely provision of an integrated network of waste management facilities to meet requirements in the West of England • To contribute to reducing and adapting to the impacts of climate change by driving waste up the hierarchy and encouraging the provision of waste management facilities at appropriate locations • To encourage sustainable construction and waste minimisation in new development • To ensure that waste management facilities do not harm the environment or endanger human health and where possible provide benefits • To locate waste development in accordance with land use priorities, giving preference to previously developed land and/or urban areas 	LP policy will be required to have regard to policies and strategic needs set out in the Waste Strategy	Sustainability objective that takes account of sustainable waste management.
<i>WoE Sustainable Drainage Developer Guide</i> (2015)	This guide is primarily intended for use by developers, planners, designers and consultants who are seeking guidance on the requirements for the design and approval of sustainable drainage systems (SuDS) in this sub-region of the West of England and Somerset.	Sets out the character of each authority in the region, the authority-specific technical and procedural requirements and how technical compliance must be absorbed into planning policy	Sustainability objective that focusses on flood risk.
<i>Wessex Water Draft Water Resources Management Plan</i> (2015)	<p>The key objectives of our plan are to:</p> <ul style="list-style-type: none"> • reduce the demand for water • reduce leakage • reduce abstraction where it is required to improve river flows • identify whether there is scope to transfer water to neighbouring companies 	<p>Outlines impacts on water management (quality and availability) from development and other environmental factors. Provides context for future development linked to water management needs. Future policy should consider issues and advice set out in document</p>	Sustainability objectives included that considers that sustainable management of water resources, minimises demand and improves quality.

<i>West of England Strategic Economic Plan 2015-2030</i>	<ul style="list-style-type: none"> • Create the right conditions for business to thrive. Give confidence and certainty to our investors to attract and retain investment to stimulate and incentivise growth • Ensure a resilient economy, which operates within environmental limits. That is a low carbon and resource efficient economy increases natural capital, and is proofed against future environmental, economic and social shocks • Create places where people want to live and work, through delivery of cultural infrastructure and essential infrastructure, including broadband, transport and housing to unlock suitable locations for economic growth • Shape the local workforce to provide people with skills that businesses need to succeed and that will provide them with job opportunities • Ensure all our communities share in the prosperity, health and well-being and reduce the inequality gap 	Policy must be aware of the strategic needs of the region for growth. Potential to guide allocation of land use linked to areas of growth/regeneration	Sustainability objectives must consider economic growth, access to jobs and social inclusion.
<i>South Gloucester Core Strategy (2013) and New South Gloucestershire Local Plan (Prospectus document)</i>	<p>Overarching & cross-cutting objectives:</p> <ul style="list-style-type: none"> • Delivering sustainable communities • Improving health & well-being • Mitigating and adapting to the impacts of climate change <p>Other objective topics:</p> <ul style="list-style-type: none"> • Responding to climate change and high quality design • Tackling congestion and improving accessibility • Managing future development • Managing the environment and heritage • Maintaining economic prosperity • Providing housing and community infrastructure 	Will need to consider and address any trans-border issues. Also a Duty to Cooperate with neighbouring authorities	The sustainability needs of adjoining communities need to be considered, as do sustainability objectives set out in related appraisals.
<i>North Somerset Core Strategy (2012) and Site Allocations Plan (publication version)</i>	<p>Tackling disadvantage and promoting equality of opportunity;</p> <ul style="list-style-type: none"> • Developing strong inclusive communities • Ensuring safer communities • Improving health and wellbeing • Developing a prosperous economy and enterprising community • Living within environmental limits 	As above	As above

<p><i>Bath and North East Somerset Core Strategy (2014) and Placemaking Plan (Publication version with Inspectors Modifications)</i></p>	<p>Key objectives:</p> <ul style="list-style-type: none"> • Pursue a low carbon and sustainable future in a changing climate • Protect and enhance the • District's natural, built and cultural assets and provide green infrastructure • Encourage economic development, diversification and prosperity • Invest in our city, town and local centres • Meet housing needs • Plan for development that promotes health and well being • Deliver well connected places accessible by sustainable means of transport 	<p>As above</p>	<p>As above</p>
<p>Local</p>			
<p><i>Bristol City Council Corporate Plan (2017)</i></p>	<p>- A vision of a city:</p> <ul style="list-style-type: none"> • In which everyone benefits from the city's success and no-one is left behind • Where people have access to decent jobs and affordable homes • In which services and opportunities are accessible • Where life chances and health are not determined by wealth and background • That leads on tackling climate change and the damaging impact of air pollution • Which is easier to get around and has improved public transport <p>- Key commitments:</p> <ul style="list-style-type: none"> • We will build 2,000 new homes – 800 affordable – a year by 2020 • We will deliver work experience and apprenticeships for every young person • We will not impose future RPZs and will review existing schemes • We will protect children's centre services • We will increase the number of school places and introduce a fair admissions process • We will put Bristol on course to be run entirely on clean energy by 2050 and introduce a safe, clean streets campaign • We will be a leading cultural city, making culture and sport accessible to all 	<p>Planning policy needs to consider relevant commitments made in the Corporate Strategy and how this should be delivered both strategically and physically on the ground. Will affect potential allocation, economic and environmental considerations</p>	<p>Provides baseline information that needs to be taken into account and related sustainability issues and objectives. Resulting sustainability objectives will apply to multiple topics.</p>

<i>Local Flood Risk Management Strategy (2014)</i>	<ul style="list-style-type: none"> • Gain a greater understanding of the flood risks posed to Bristol and its people and places • Actively manage flood risk infrastructure to reduce the likelihood of flooding causing harm to people and damage to society, the economy and the environment • Increase public awareness and encourage communities to take action to manage the risks that they face • Understand communities flooding concerns and priorities, and gather knowledge based on their perception of flooding • Promote sustainable development that seeks to reduce flood risk and includes a consideration of climate change • Improve preparedness for flood events and post flood recovery 	Identify areas at risk of flooding and promote adaptation and mitigation to risks of flooding.	Sustainability objective that focusses on flood risk.
<i>Surface Water Management Plan (2012)</i>	<ul style="list-style-type: none"> • Undertaken to understand the rise of flooding to Bristol from heavy rainfall. • Refine existing, national and surface water models to including underground pipe network 	Identified areas of high risk to flooding. Bristol at significant risk of surface water flooding. Approximately 30000 properties at risk during extreme event	Sustainability objective that focusses on flood risk.
<i>Avonmouth/ Severnside Strategic Flood Risk Assessment (2011)</i>	<ul style="list-style-type: none"> • Avoid areas of highest flood risk in the Avonmouth area. • Address likely flood risk from the sea and rhyne network to various development sites. • Mitigate significant flood risk posed to Avonmouth and Severnside, which is likely to dramatically increase with climate change Due to presence of tidal flood defences, flood risk in the present day mostly from the rhyne network • Highlight where, with climate change and sea level rise, defences are likely to be inadequate and flooding from the sea becomes the greatest risk 	Strategic flood defence solution required to enable Policy or measure across the area	Sustainability objective that focusses on flood risk.
<i>Bristol Housing Strategy 2015-2020</i>	<p>Provide well designed, quality homes that are affordable, sustainable and suitable for people's needs:</p> <ul style="list-style-type: none"> • Deliver the best use of existing housing • Raise standards in the private rented sector • Reduce the number of empty private homes • Sustaining occupation /tenancies • Enabling access to housing • Work with communities, individuals and families to create resilient households 	Highlights the need to deliver housing and affordable housing to meet shortfall in provision.	Sustainability objective that ensure the delivery of sufficient homes and affordable housing. Ensure social inclusion and decrease inequalities.

<p><i>Bristol's Parks and Green Space Strategy (2008)</i></p>	<p>Objectives of the strategy:</p> <ul style="list-style-type: none"> • Raise the quality of parks and green spaces • Encourage greater use and enjoyment of Bristol's parks and green spaces by all sectors of the community • Contribute to the wider planning of the urban fabric of the city by providing a range of good quality parks and green spaces, which play a significant role in meeting the needs of balanced and sustainable communities and enhancing the urban landscape, to help make Bristol a green and sustainable city • Protect needed green space from development • Rectify shortage in particular types of green space across the city to ensure all residents have access to formal, informal, natural, sports and children & young people's spaces • Provide a clear basis for beneficial investment in green spaces - identifying those areas of Bristol where investment and improvements in green space are most needed - helping the council 'spend better' • Encourage active and healthy life-styles and promote social inclusion • Encourage community participation in the improvement and management of green spaces 	<p>Take account of the adopted standards with in the PGSS as a needs assessment of open space provision. Seek to protect important open space.</p>	<p>Sustainability objectives that include the protection of and access to important open space.</p>
<p><i>Allotment Strategy 2009-2019</i></p>	<p>Five broad aims:</p> <ul style="list-style-type: none"> • Provide Enough Allotments • Promote Allotment Use and Food Growing • Good Administration • Environmental Sustainability • Provide Enough Resources 	<p>Take account of the needs of food growing and protect important sites.</p>	<p>Sustainability objectives that seek the protection of and access to important open space, which will include areas for food growing.</p>

<p><i>Bristol Biodiversity Action Plan. Bristol Biodiversity Partnership (2008)</i></p>	<p>The Bristol BAP aims to:</p> <ul style="list-style-type: none"> • Provide a strategic overview for biodiversity conservation in Bristol • Highlight priority habitats and species that are of particular value in Bristol, both within the national and local context • Highlight threats and issues affecting these priority habitats and species, together with objectives, targets and actions to address them • Encourage a common approach to biodiversity conservation and sharing of best practice • Encourage education and community action and involvement as a key part of the biodiversity process • Promote biodiversity conservation as an essential element of sustainable development • Promote the importance of Bristol's biodiversity at a local, regional and national level • Develop Bristol as a centre of excellence for urban biodiversity conservation 	<p>Take account of land and sites that contribute to the city's ecological needs and ensure protection of important sites.</p>	<p>Sustainability objectives to be included that account for biodiversity needs.</p>
<p><i>Bristol Health and Wellbeing Strategy (2013)</i></p>	<p>Key priorities:</p> <ul style="list-style-type: none"> • Create a high quality and well-connected built and green environment, and manage the health impacts of Climate Change • Achieve a healthier, more sustainable, more resilient food system for the city to benefit the local economy and the environment • To reduce all forms of domestic, gender-based, and racially based violence and abuse, including sexual exploitation • Reduce the prevalence of smoking, reduce illicit tobacco availability and increase smoke free areas within the city • Reduce the harm caused by alcohol misuse. • To give children the best start in life • Improve mental wellbeing and reduce social isolation • To better meet the needs of people with dementia and their carers through improved services and dementia friendly environments • To improve the clinical quality of and satisfaction with maternity services • Take every opportunity to improve specific outcomes and quality in the delivery of services for adults, children and vulnerable people through integrated care and support 	<p>Ensure the protection of human health is incorporated throughout policy and take account of areas of need; eg AQMAs and areas of health inequalities.</p>	<p>Sustainability objectives relating to the promotion of physical, mental and social health and wellbeing. A cross cutting theme that also involves wider inequalities and deprivation.</p>

<p><i>Bristol Resilience Strategy</i> (2016)</p>	<p>Gives overall target and aims to work creating sustainable and resilient communities. Key Priorities</p> <ul style="list-style-type: none"> • Every person living in Bristol has the assets and opportunities to enjoy a good quality of life • The city centre and neighbourhoods are great places for people of all ages to live, work, learn and play • The city and region prosper within environmental limits through adopting new behaviours and technology • Bristol citizens and leaders make effective decisions based on shared priorities and real-time information • A strong network of local communities and organisations promotes trust, cooperation and shared action across the city 	<p>Policies that take account of the aims and objectives would cover multiple topics.</p>	<p>Sustainability objectives that recognise the strategy's focus on several themes, including protection of the environment; social inclusion and adaptation to climate change.</p>
<p><i>Towards a Zero Waste Bristol: Waste and Resource Management Strategy</i> (2016)</p>	<p>Key Objectives are set out in a number of overall topics:</p> <ul style="list-style-type: none"> • Support the circular economy • Reduce carbon emissions and protect natural resources • Maintain and enhance Bristol's streets and neighbourhoods <p>These are supported by a number of targets:</p> <ul style="list-style-type: none"> • Produce the lowest amount of residual household waste per person per year of any UK Core city and aims for a target of below 150 kg per person per year by 2025 • Send less than 5% of waste to landfill by 2030 • Recycle and prepare for re-use (including composting) 50% by 2020 and 70% by 2025. • Reduce the amount of food waste going into residual waste (black bin) from almost 40% to 10% by 2025. • Increase overall satisfaction with street scene by 10% in Bristol neighbourhoods identified as having the most significant issues by 2018 	<p>Policies that take account of aims and targets set out in the document.</p>	<p>Sustainability objective that takes account of sustainable waste management.</p>

Appendix B – Draft Scoping Report Consultation Response

Date: 07 April 2017
Our ref: 210045
Your ref: -

Rob McGovern
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Dear Mr McGovern

Bristol City Council Local Plan Review Draft Sustainability Appraisal

Thank you for your consultation on the above dated 03 March 2017, which was received by Natural England on the same date.

We have considered the Sustainability Appraisal Scoping Report, which appears to demonstrate a reasonable understanding of the Plan area and the context in which it will be prepared, including with respect to the emerging Joint Spatial Plan. We would, however, like to make the following comments and suggestions regarding the natural environment.

The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

The Scoping Report recognises the rich biodiversity of Bristol, which includes a number of statutory designated sites. The SA will need to distinguish clearly between international, national and local designated sites and apply the requirements of the 'mitigation hierarchy' when considering adverse impacts on all biodiversity, recognising the potential ecological value of some brownfield land.

The Plan area is part of the Bristol, Avon Valleys and Ridges National Character Area (NCA), which encompasses the city with its historic port and the surrounding areas. The area is characterised by alternating ridges and broad valleys, has a complex geology and is rich in geomorphological features such as the dramatic Avon Gorge and other designated exposures.

Consideration should be given in the SA to the underlying geology and landform of Bristol and its significance to townscape and landscape character, including the importance of protecting valued views within and beyond the city.

Well planned and managed green (and blue) infrastructure can provide a wide range of ecosystem services that are essential to achieving sustainable development. The multifunctional role of GI and its potential to contribute to social, economic and environmental sustainability objectives should be made more explicit in the Scoping Report, for example in relation to addressing health, transport, and air and water quality issues.

The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations]

We note the Council's intention to undertake a Habitat Regulations Assessment of the Local Plan alongside the SA, with the findings of the HRA informing the SA. We would be pleased to comment further on these in due course.

For any queries relating to the specific advice in this letter, please contact me on 07900 608311. For any new consultations please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Amanda Grundy
Somerset, Avon & Wiltshire Area Team