

**Appendix 2: Framework to inform the prediction and evaluation of the effects of
Publication Version November 2023 Draft Local Plan Site Allocations and Areas of
Growth and Regeneration (Task B3)**

Framework to inform the prediction and evaluation of the effects of Publication Version November 2023 Draft Local Plan Site Allocations and Areas of Growth and Regeneration (Task B3)

Introduction

The purpose of this framework is to add detail to SA Framework set out within Section 3 of the main SA Report, to assist in the prediction and evaluation of the social, economic, and environmental effects of proposed allocations or areas of growth and regeneration within the Bristol Local Plan Pre-Submission Publication Version (November 2023). This specifically applies to:

- Areas of Growth and Regeneration (**Appendix 3**, against Draft Policies DS1 – 14);
- Site Allocations (Draft Policy DA1) (**Appendix 4**); and
- Industrial and Distribution Areas and Maritime Industrial Warehousing Areas (Draft Policy E4) (**Appendix 4**).
- Avonmouth Industrial Area and Bristol Port (Draft Policy E5) (**Appendix 4**).

As retained site allocations have been assessed within previous Sustainability Appraisals (i.e., Bristol Central Area Action Plan Sustainability Appraisal February 2012 and Site Allocations and Development Management Policies Sustainability Appraisal 2013), it is not considered proportionate nor necessary to review these again as part of the Bristol Local Plan Pre-Submission Publication Version (2023) Sustainability Appraisal. A list of retained adopted site allocations is set out in Appendix 3 also.

Methodology and assumptions for predicting and evaluating the effects

The appraisal of proposed allocations and areas of growth and regeneration has used GIS to inform a high-level assessment of effects.

Specifically, the approach set out within **Table 1** below refers to a set of indicative criteria and thresholds which have been developed to benchmark effects based on proximity to certain services, designations, features, or assets. Assessment criteria align with and add definition to sustainability objectives and decision-making criteria set out in the SA framework, to ensure a proportionate and consistent approach to the assessment of all site allocations and areas of growth and regeneration.

Based on good practice guidance, assumptions made to inform the prediction of effects of site allocations are as follows:

- Criteria form a guide for the assessment. Firstly, site allocation options were assessed for predicted effects based on GIS analysis, with straight-line distances (i.e., ‘as-the-crow-flies’) used to assess thresholds. Particularly for the areas of growth and regeneration, professional judgement was then applied to further test and describe potential significant effects and consider the potential for mitigation to be incorporated. For the draft allocations, a summary of effects and proposed mitigation is described.
- Assessment was based on proximity of existing services and facilities, i.e., primary schools, secondary schools, healthcare facilities, sports facilities, retail centres and open spaces. While

some sites may be large enough to provide new facilities in their own right, no such provision was assumed by this SA Report unless this was set out within associated draft policy text (i.e., draft Development Strategy policy text of draft development considerations of the draft allocations).

- 'Policy-on' mitigation to minimise negative and enhance positive impacts may be addressed elsewhere in emerging draft policies, and therefore cross-references are made where relevant.

Limitations and difficulties encountered

The assessment of draft allocations and areas of growth and regeneration was undertaken in Summer 2023. Limitations and difficulties are referenced against respective policies and for the process for assessment below:

- It should be noted that indicative criteria or thresholds have not been defined for each and every potential effect, as in some cases there is no obvious or accessible corresponding GIS dataset. This is considered to be an accepted approach.
- Data used to inform the Interim SA Report (2019) assessment of site allocations and areas of growth and regeneration has understandably aged since the assessment was prepared in early 2020. This assessment has been updated for sites where new data exists, which has resulted in slight changes in assessment of effects since the Interim SA Report (2019).
- Similarly, the evidence base supporting the Local Plan was emerging throughout the production of the SA. Therefore, the prediction and evaluation of the effects of Bristol Local Plan Pre-Submission Publication Version (November 2023) and areas of growth and regeneration should recognise that the baseline for assessment will change throughout the next stages of plan preparation (for example the Level 2 SFRA which was emerging during finalisation of this SA Report).

Table 1 Methodology for appraising Site Allocations and Areas of Growth and Regeneration

SEA Theme	SA Framework Objective	Decision-making criteria	Indicative Assessment Guide and Rationale			
			Housing-led allocations (with an element of mixed-use) and Areas of Growth and Regeneration	Employment-led allocations (i.e. Industrial and Distribution Areas and Avonmouth Site Allocations)	Justification for criteria where relevant	Evidence used to inform assessment
Population, Housing and Communities	1.To ensure an adequate and diverse supply of housing that is affordable to everyone	<p>DMC1: Would development or policy provide sufficient housing to meet the identified needs of all communities within the city?</p> <p>DMC2: Would the development or policy ensure an adequate contribution to affordable housing?</p> <p>DMC3: Would the development or policy provide an appropriate mix of types of housing to meet the identified needs of all communities within the city, without resulting in harm to existing communities?</p> <p>DMC4: Would the development or policy enable alternative methods of delivery, including community-led and self-build?</p>	<p>Site Allocations: All potential residential allocations are expected to result in positive effects as they will contribute to the provision of additional housing, including affordable homes where applicable (+).</p> <p>The NPPF requires that the provision of affordable housing should not be sought for residential developments unless these are part of major development proposals. Therefore:</p> <ul style="list-style-type: none"> • Larger sites (>10 homes) will contribute more to affordable housing (+). • Smaller sites (<10 homes) are not required to make a contribution to affordable housing, despite increasing the overall number of homes (0). • Where capacity is subject to wider master-planning or not specified in the development considerations for the site, effects for DMC2 are unknown (?). <p>Potential residential allocations that require alternative methods of delivery for homes, such as a level of self-build, custom house-building or community-led housing or those which require a greater mix of housing-types will contribute significantly to achieving this Objective (++).</p> <p>Areas of Growth and Regeneration: The draft policies for Areas of Growth and Regeneration all achieve positive or significant positive effects when assessed against SA Objective 1. There is some variation in the degree of effects based on specific reference to factors such as ‘housing type’.</p>	N/A	This approach is broadly consistent with the NPPF and good practice.	Site Allocations and Areas of Growth and Regeneration boundaries (March 2019 Consultation Draft and Publication Version November 2023 Draft Local Plan)
	2. Promote the conservation and wise use of land, maximising the reuse of previously developed land	<p>DMC5: Would development or policy provide an opportunity for the reuse or regeneration of previously developed land?</p> <p>DMC6: Would development or policy provide an opportunity for a higher density within a sustainable location?</p>	<p>Site Allocations: Categorised as:</p> <ul style="list-style-type: none"> • Sites occupying >0.5Ha of brownfield or previously developed land (++) • Sites occupying <0.5Ha of brownfield or previously developed land (+) • Sites occupying <0.5Ha of greenfield land (-) • Sites occupying >0.5Ha of greenfield land (- -) <p>Areas of Growth and Regeneration: Categorised as:</p> <ul style="list-style-type: none"> • Areas of Growth and Regeneration comprising predominately brownfield land (++) • Areas of Growth and Regeneration comprising development on greenfield and brownfield land (-/?) • Areas of Growth and Regeneration comprising predominantly greenfield land (--) <p>Site Allocations and Areas of Growth and Regeneration: For the purpose of the assessment, a sustainable location is considered to be one which is located within or close to the city centre and other local centres or major transport routes, where residents are more likely to be able to access transport infrastructure, services and facilities on foot rather than needing to use a private motor vehicle.</p> <p>Sites are categorised as follows based on the Urban Potential Assessment from 2016:</p> <ul style="list-style-type: none"> • 200 units/ha in a city centre setting (++); • 120 units/ha in a ‘more intensive’ inner urban setting; 100 units/ha in a general inner urban setting; and 60 units/ha in a ‘more intensive’ outer urban area (+); and • All other areas, such as the 50 units/ha in a general outer urban area, are assigned a 0 (neutral effect) (0). <p>It is recognised that there is a degree of uncertainty in whether a particular site is likely to be appropriate for higher density development, and this may depend on other site-specific factors. No further consideration of the appropriateness of high-density development is provided in the appraisal of site allocations at this stage.</p>	<p>National planning policies encourage efficient use of land for employment uses. Therefore:</p> <ul style="list-style-type: none"> • Sites which maximise efficient use of brownfield land that was previously in use for employment land AND in or adjacent to employment locations (++/?); • Sites which maximise efficient use of brownfield land that was previously in use for employment land (+); • Sites which are situated in or adjacent to employment locations, however which are on greenfield land (0/?); and, • Sites which fail to maximise efficient use of brownfield land or encourage employment development in unsustainable contexts (--). <p>As set out within the West of England Employment Land Strategic Needs Assessment (2021)², employment locations are considered to be:</p>	<p>Reflects good practice approaches, including SAs of previously adopted development plans for Bristol and therefore remains appropriate for this plan. Thresholds are based on definition of small and medium sized sites as defined in the NPPF.</p> <p>This approach is consistent with objectives to increase efficient use of land, including densities assumed within Urban Potential Assessment. Employment locations are considered were those identified by the ELSNA (2021)</p>	<p>DMC5 and DMC7: Professional judgement review based on:</p> <ul style="list-style-type: none"> • Review of current use and extent of brownfield land¹; • GIS layers including adopted Important Open Space (IOS) and Green Belt. • GIS Layers including the emerging Local Green Space and Reserved Open Space (March 2019) <p>DMC6: Urban Potential densities layer (2016) and ELSNA (2021).</p>

¹ <https://data.gov.uk/dataset/82c7cfa3-b89d-4c3a-9ce1-daa2b6561d8d/bristol-brownfield-land-register-2018>

² <https://www.westofengland-ca.gov.uk/wp-content/uploads/2021/11/ELSNA-summary.pdf>

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				<ul style="list-style-type: none"> Industrial Market – Accessible locations where the sector is concentrated (i.e. the arc from Emersons Green Enterprise Area through to Filton Enterprise Area in SGC). Logistics and Distribution – Land focussed at Avonmouth and Severnside Enterprise Area and smaller-scale ‘last mile’ distribution centres. Office Market – located around Bristol City Centre and around the Temple Quarter Enterprise Zone. 		
		DMC7: Would development or policy maintain greenfield land and maintain the openness and permanence of the Green Belt?	<p>There is a presumption against inappropriate development in the Green Belt within national policy. Sites will therefore be assessed as follows:</p> <ul style="list-style-type: none"> Sites that are not located within the Green Belt nor on greenfield land, and are proposed on existing previously developed land (0); Sites that are not located within the Green Belt, but which are proposed on land which is predominantly green (-); Sites that are located within the Green Belt (- -). 		This approach will draw on evidence base work, such as the New Protection for Open Space (2018 and updates) and the JSP Green Belt Review (Stage 1, 2015 and Stage 2, 2016).	
	3. Ensure easy and affordable access to key services	DMC8: Would development be within, or would policy ensure development is within, easy walking distance of key services (e.g. GP, post office, community centre)?	<p>Local services and community facilities are defined in the NPPF as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.</p> <p>Site Allocations: With proximity to open spaces considered elsewhere, sites will be assessed against the following:</p> <ul style="list-style-type: none"> Sites that are within easy walking distance (<800m) to a range of key services (including Town, District or City centre) (++); Sites that are within easy walking distance (<800m) of a limited number of key services (local centre)(+); and Sites that are not within easy walking distance (>800m) of key services (local centre) (-). <p>Areas of Growth and Regeneration: Given the generally mixed-use nature of these current proposals, the following effects are achieved where an Area of Growth and Regeneration:</p> <ul style="list-style-type: none"> Overlaps with a larger defined Centre (including Town, District or City centre) and contains a range of key services (++/?); or Not within easy walking distance of a defined centre, but draft policy requires retail provision or provision of any key service defined above (0/?). 	N/A	Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes’ walking distance (around 800 metres) ³ .	DMC8: Layers relating to: <ul style="list-style-type: none"> Adopted and emerging Centres layer.
	4. Increase participation in cultural and community activities	DMC9: Would development or policy result in a net gain of community or service facilities?	<p>For most sites, detail of a development may not be known at this stage, in which case the effects would be considered to be unknown (?).</p> <p>Where development places demand on community infrastructure, CIL may be used for development of replacement or improvement of existing facilities (+ /?)</p> <p>As there is a presumption against the loss of community facilities (through Policy CF1), any outright loss of community facilities without mitigation would be seen as negatively effecting this Objective (- -).</p>	N/A	Whilst the Bristol Central Area Action Plan uses walking distances derived from Barton et al (2011) to different community uses, these distances are now becoming relatively dated and do not appear to be used by current assessments.	
Health and Inequalities	5. To reduce poverty and income inequality and improve the quality of life for those	DMC10: Would development or policy contribute to improvements in the built environment in deprived areas?	<p>Site Allocations: Across both allocation types, assessment criteria are categorised as:</p> <ul style="list-style-type: none"> Mixed-used sites that are located within areas of high deprivation could offer an opportunity for investment and local employment (++). 		Higher deprivation is typically defined as the top 30% most deprived LSOAs, based on the Index of Multiple Deprivation.	DMC10 and DMC11: Index of Multiple Deprivation by LSOA (2019) (Data.gov.uk, accessed July 2023)

³ Planning for Walking (CIHT, 2015) https://www.ciht.org.uk/media/4462/ciht_-_planning_for_walking_document-12pp_v2_singles.pdf

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	living in areas of concentrated disadvantage.	DMC11: Would development or policy offer potential for regeneration or investment in deprived areas (i.e. new homes, jobs and infrastructure?)	<ul style="list-style-type: none"> Residential-only or employment-only sites that are located within an area of high deprivation (+). Sites that are not located within areas of high deprivation (0). Sites that would result in a net loss of active employment on the site or prejudice future investment in infrastructure, in an area of high deprivation (- / - -) (such as major infrastructure schemes defined within the Joint Local Transport Plan). <p>Areas of Growth and Regeneration: Noting the scale of Areas of Growth and Regeneration, it is assumed that there would be potential for direct and indirect benefits for the built environment for areas that are more deprived:</p> <ul style="list-style-type: none"> High levels of deprivation or unemployment includes areas predominantly (around half or more) in IMD Decile 1-3 (++/?). Moderate levels of deprivation where sites are predominantly in IMD Deciles 4- 6 (+/?). Low levels of deprivation where sites are predominantly in IMD Deciles 7 - 10 (0). 		Given the scale of AGRs, it was considered appropriate to review Deciles 1-3.	
	6. To reduce health inequalities and promote healthy lifestyles across the city.	DMC12: Would development or policy contribute to improving air quality?	<p>Site Allocations and Areas of Growth and Regeneration: Sites within an AQMA, without appropriate mitigation, could expose new development to areas in breach of health-based criteria. However, it is uncertain about the extent to which appropriate mitigation will be incorporated into a site-specific design at this stage. In addition, the degree to which a new development would adversely impact on air quality would depend on several site-specific factors, including level of parking provision and provision of electric vehicle charging infrastructure. As these are currently unknown at this stage and partially linked to development design, these factors cannot be adequately appraised within the assessment.</p> <p>For the purposes of the assessment, sites which are in an AQMA are therefore considered to achieve a (-) score, whilst sites outside an AQMA achieve a (0) score. The Bristol Clean Air Zone (introduced in November 2022) has not formed part of the assessment at this stage.</p>		This approach is consistent with objectives to increase efficient use of land.	DMC12: Bristol AQMA boundary (2017) and Intersect with the Air Quality Cumulative Impact Areas.
		DMC13: Would development or policy contribute to positive wellbeing and healthy lifestyles, including good living conditions and access to open spaces, pleasant surroundings and healthier food choices?	<p>Site Allocations: With access to healthier food choices and healthy lifestyles covered elsewhere, this assessment has been categorised by:</p> <ul style="list-style-type: none"> Sites that are within 400m of a defined open space (++). Site that are within 800m of a defined open space (+). Sites that are more than 800m from a defined open space (-). <p>Area of Growth and Regeneration: Areas are within 400m of a defined open space (+), or include references to protection of spaces within the AGR boundary (+/?).</p>	N/A	Standards for Green Spaces are set out within a combination of Bristol Parks and Green Spaces Strategy (2008) ⁴ , and Accessible Natural Greenspace Standards (ANGSt).	DMC13: Emerging Local Green Space and Reserved Open Space (March 2019).
		DMC14: Would development or policy make walking and cycling easy and attractive as routine methods of transport?	<p>Using GIS distances as a guide, assessments have been categorised as:</p> <ul style="list-style-type: none"> Sites that are on or adjacent to (<400m) key walking routes / walking route enhancement network AND adjacent to the existing / proposed cycling network enhancements (++); Sites that are on or adjacent to(<400m) key walking routes / walking route enhancement network OR adjacent to the existing / proposed cycling network enhancements (+); Sites which are not in close proximity (>400m) OR which have limited access to walking network / public rights of way and cycling network (-); and Sites which do not enable access to a walking or cycling network as routine methods of transport (- -). 		The West of England Local Cycling and Walking Infrastructure Plan (2020) sets out key walking enhancement routes and cycling enhancement networks, alongside existing cycling and walking routes.	DMC14: Public rights of way mapping (2016, updated 2018, accessed July 2023), existing strategic and local cycling network and cycling network enhancements ⁵).
	7. Ensure access to education and learning for all sections of society	DMC15: Would development or policy result in a net gain of adequate educational facilities?	<p>Site Allocations: Assessment is based on the following:</p> <ul style="list-style-type: none"> Where a site is particularly large, this may result in educational provision on-site (but this is subject to capacity in adjacent existing facilities) (++/?). Where a site would result in a greater number of homes within close proximity (within 400m - 800m) to an educational establishment, this may have a positive effect on the ability to achieve adequate provision subject to capacity of existing facilities (+/?). Development which generates additional need for education provision but not within the defined distances and not of a scale to provide on-site, could result in an overall net loss of accessibility to adequate education (-/?). Finally, as there is a presumption against the loss of educational establishments (through draft policy CF1), any outright loss of an existing educational establishment would be seen to negatively affect this objective (--). <p>Areas of Growth and Regeneration:</p>	N/A	CIHT walking distances are used. These distances are consistent with the approach in BCAAP and more conservative than recent guidance which indicates that schools should be within 2 miles (below 8 years old), and within 3 miles (for children aged 8 to 16 years old) ⁶ .	DMC15 and DMC16: Educational establishments, including: <ul style="list-style-type: none"> Pre-schools; Primary Schools; Secondary and SEN schools; Additional support. Layer published by BCC in 2014, updated in 2018 and accessed in July 2023)

⁴ https://www.bristol.gov.uk/documents/20182/34780/Parks%20and%20Green%20Space%20Strategy%20-%20adopted%20Feb%202008_0_0_0_0_0_0.pdf/6bb2635a-ac11-4f22-b6fd-5b708b329940

⁵ <https://data.bristol.gov.uk/geonetwork/srv/eng/catalog.search#/metadata/826bcbf6-c323-4e83-b383-e0f539a11849>

⁶ New home to school travel and transport guidance (2014) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/295189/Home_to_School_Transport_Consultation_Document.pdf

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			<ul style="list-style-type: none"> Where an Area of Growth and Regeneration proposes an existing educational facility within its boundary (++/? , subject to capacity). Where an Area of Growth and Regeneration contains, or is within, 800m of early years or primary school; or within 1500m of a secondary school (+/?). Development within an Area of Growth and Regeneration which is beyond 800m / 1500m of an educational establishment, and which does not mandate the provision of a school (or contribution to) within the policy text, could result in an overall net loss of accessibility to adequate education (-/?). 			
		DMC16: Would development or policy ensure that educational services are located within easy walking distance?	Assessment criteria have been categorised as: <ul style="list-style-type: none"> Sites that are within 800m of a primary school and 1500m of a secondary school (+); and, Sites that are not within 800m of a primary school and 1500m of a secondary school (-). 	N/A		
Economy and Employment.	8. To support the economy and ensure that there are suitable opportunities for employment.	DMC17: Would development or policy provide a range of high quality employment spaces to meet the identified needs of all communities and employers within the city?	N/A	Assessment will be broadly based on qualitative analysis of the following: <ul style="list-style-type: none"> Development that could maintain, or deliver new, high quality employment spaces, particularly in areas which are currently experiencing high rates of unemployment e.g. South Bristol (++); Site could enable provision of space to support sector strengths, although this is likely to be uncertain until any future planning application comes forward on the site (+ /?); and Site would result in no net loss of used employment areas to other uses, where scale of loss determines the scale of effect (-/- -/?). <p>Areas of Growth and Regeneration: Noting the scale of Areas of Growth and Regeneration, it is assumed that there would be potential for direct and indirect benefits for employment across areas that are more deprived. Assessment of effects would be as follows:</p> <ul style="list-style-type: none"> Predominantly employment uses proposed in an area with a high proportion of unemployment (IMD Decile 1-3) (++/?). Mixed use proposed in an area with a high (IMD Decile 1-3) or moderate (IMD Decile 4-6) proportion of unemployment (+/?). Predominantly on-employment uses proposed in an area of high proportion of unemployment (0/? or -/?). 	Areas of high rates of unemployment are determined as the top 10% - 30% within the Employment Deprivation Mapping identified within Index of Multiple Deprivation (2019). The West of England Local Industrial Strategy (LIS) identifies three significant sector strengths: advanced engineering; including aerospace; creative, cultural and digital industries; and financial, business and legal 'tech' services.	DMC17-20: Areas of high unemployment from Index of Multiple Deprivation (MHCLG, 2019) ⁷ by LSOA. (Data.gov GIS Layer Index of Multiple Deprivation (Dec 2019) ¹⁰ Accessed July 2023)
		DMC18: Would development or policy support opportunities for growth (i.e. creation of employment spaces, supporting infrastructure etc.) in priority employment sectors?				
		DMC19: Would development or policy regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment?				
		DMC20: Would development or policy maintain existing strategic employment opportunities?				
		DMC21: Would development or policy support delivery of carbon neutral employment, by reducing the need to travel for employment, improving digital connectivity or delivering low or zero carbon employment spaces?	N/A	Assessment is broadly based on qualitative analysis of the following: <ul style="list-style-type: none"> Site would likely enable the delivery of low carbon sector employment or deliver low carbon employment spaces through appropriate mitigation (+ /?). Site would likely result in the creation of jobs in higher carbon sectors, would increase the 		

⁷ http://dclgapps.communities.gov.uk/imd/ioid_index.html#

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				<p>need to travel for employment or would not adopt appropriate mitigation (- / ?).</p> <ul style="list-style-type: none"> Unclear what sectors site may be support based on developer considerations / associated policies (?). 		
	9. Ensure access to a range of shopping facilities for all sections of society	<p>DMC22: Would development or policy enhance and diversify the vitality and viability of the city, local and / or retail centres?</p> <p>DMC23: Would development be, or policy ensure, development is within easy walking distance of retail services?</p>	<p>Site Allocations: Sites will be assessed using GIS for their proximity to defined centres and qualitatively assessed by land use, as follows:</p> <ul style="list-style-type: none"> For all mixed-use sites that are located within a city, town, district or local centre, or residential uses that are within 800m of a local centre, there is an opportunity to continue to enhance and diversify the vitality and viability of this centre (+); and For employment only or residential only uses located beyond 800m from a town, district or local centre, the effect is considered to be neutral (0). <p>Areas of Growth and Regeneration: Given the generally mixed-use nature of these policy proposals, a beneficial effect (+/?) is achieved where an Area of Growth and Regeneration overlaps with, or is within 800m easy walking distances of a City, Town or District centre.</p>		<p>The promotional policy position for uses which contribute to maintain the viability, vitality and diversity of centres, including active ground floor uses, is established within retained policies BCS7 and DM7 – DM10. Again, accepted walking distances from CIHT (2015) are used.</p>	<p>DMC22 and DMC23: Adopted and emerging Centres layer.</p>
Townscape and Landscape	10. To ensure the conservation and enhancement of local character including important landscape features and the historic environment and its setting	<p>DMC24: Would development or policy support the conservation and enhancement of heritage assets, townscape and landscape?</p>	<p>Site Allocations: All effects on heritage, townscape and landscape assets are considered to be uncertain as they will depend on the design of the development which is currently unknown (?); effects may be beneficial where a heritage-led contextual response is provided. Therefore, whilst GIS layers can form a guide (thresholds which are appropriate for a city centre context), the effect will ultimately be based on whether mitigation measures can be introduced. The following assessment criteria will be employed:</p> <ul style="list-style-type: none"> Site is within a Conservation Area or Registered Park and Garden, OR contains other designated heritage assets (such as Listed Buildings / Scheduled Monuments), and reference is made to conservation and enhancement of these (+ /?). Site is not within a Conservation Area or Registered Park and Garden, AND is not adjacent to a designated heritage asset (such as Listed Buildings / Scheduled Monuments) (0). Site is within a Conservation Area or Registered Park and Garden, OR contains or is adjacent to a designated heritage asset (such as Listed Buildings / Scheduled Monuments), AND inadequate reference is made to mitigation measures (- /?) OR (- /?) and <p>Area of Growth and Regeneration: Again, all effects are considered to be uncertain as they will depend on design-specific considerations which are currently unknown. However, similar to the above:</p> <ul style="list-style-type: none"> Where an Area of Growth and Regeneration contains or overlaps with a Conservation Area or Registered Park and Garden, or contains other designated heritage assets (such as Listed Buildings / Scheduled Monuments), and reference is made to conservation and enhancement of these (+ /?); Where an Area of Growth and Regeneration contains or overlaps with a Conservation Area or Registered Park and Garden, or contains other designated heritage assets (such as Listed Buildings / Scheduled Monuments), and inadequate reference is made to preservation and enhancement measures (-- /? Or - /?); Site is not within a Conservation Area or Registered Park and Garden, and is not adjacent to a designated heritage asset (such as Listed Buildings / Scheduled Monuments) (0). 	<p>Consideration of heritage assets varies, with most assessments mainly seeking to determine if proposed allocations contain designated heritage assets.</p>	<p>DMC24: Assets including:</p> <ul style="list-style-type: none"> Conservation Areas (2011, updated 2018) Listed Buildings (Data.gov.uk, July 2023¹²) Scheduled Monuments (Data.gov.uk accessed July 2023¹³) Registered Park and Gardens (Data.gov.uk accessed July 2023) 	
	11. To ensure the conservation and enhancement biological and geological assets and improve the quality of wildlife habitats	<p>DMC25: Would development or policy conserve and / or enhance biological, geological and nationally or internationally designated nature conservation assets as well as non-statutory designations?</p> <p>DMC26: Would development or policy enable a net gain in biodiversity?</p>	<p>Site Allocations and Areas of Growth and Regeneration: Ecological or geological assets could include: Ancient Woodlands; Ramsar sites; National Nature Reserves; Sites of Special Scientific Interest; Special Areas of Conservation, and Special Protection Areas. Local designations include: Site of Nature Conservation Interest; Regionally Important Geological and Geomorphological Sites; Local Nature Reserves; or Wildlife Network Sites.</p> <p>Whilst development of sites would need to be in accordance with retained policies, any effects on protected sites will be dependent upon mitigation measures which will be implemented as part of the design, and as such these are currently unknown (?).</p> <p>The following categories offer a broad guide for assessing effects of both categories of allocations:</p> <ul style="list-style-type: none"> The draft site allocation or Area of Growth and Regeneration does not overlap with, but may be adjacent to, an ecological or geological designation; therefore, it may have a neutral effect subject to any mitigation proposed (0/?); The draft site allocation or Area of Growth and Regeneration falls within a SSSI impact zone (?); The draft site allocation or Area of Growth and Regeneration is situated within a local ecological or geological designation, therefore, it may have a minor negative effect subject to any mitigation proposed (- /?); and The draft site allocation or Area of Growth and Regeneration is situated within a statutory ecological or geological designation; therefore, it may have a significant negative effect subject to any mitigation proposed (- - /?). <p>Site Allocations and Areas of Growth and Regeneration: Sites that have currently high levels of biodiversity are likely to become increasingly difficult to demonstrate a 10% 'net gain' in biodiversity (-/?). Draft proposed policies, including Draft Policy BG3 Achieving</p>	<p>Consideration of designated assets varies, with assessments generally drawing on varied proximity-based criteria.</p> <p>CIEM guidance encourages use of professional judgment.</p>	<p>DMC25 and DMC26: Layers included: Ancient woodlands; Ramsar Sites; National Nature Reserves; SSSI and Risk Zones; SAC; LNR; SPA; SNCI; Wildlife Corridors; and RIGs (Accessed July 2023)</p>	

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			<p>Biodiversity Net Gains, set the context for achieving net gains for biodiversity across the city. This is a requirement legislated by the Environment Act 2021, effective from November 2023 for major sites and from April 2024 for small sites.</p> <p>Whilst the Defra Biodiversity Metric 4.0, created by DEFRA is the current tool for assessing biodiversity net gain, this requires inputs regarding the loss of habitats and biodiversity values of these. This will likely be determined through scheme design and application process; it is unclear at this stage. On this basis, the assessment against this decision-making criterion is currently uncertain (?).</p>			
	12. To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation	DMC27: Would development or policy maximise the opportunity to provide multifunctional green infrastructure?	<p>Site Allocations: Emerging Draft Policy BG1 sets the context for achieving green infrastructure functions and benefits.</p> <p>Using these policies, the design of a development will ultimately guide the extent to which a site contributes to multi-functional green infrastructure, and as such, all effects are uncertain at this stage (?). However, specific sites may have locational advantages which mean that these can connect to the strategic green infrastructure network, deliver flood risk mitigation opportunities or connect to local food growing spaces.</p> <p>Sites which are within two of the following designations are therefore likely to score a more positive effect for these locational advantages: higher flood risk areas (i.e., 3a or 3b); contain existing allotment land which could be expanded; intersect with or are bounded by a designated greenway; or are located within a West of England Nature Partnership (WENP) Nature Recovery ‘opportunity areas’, will score positive unknown (+/?).</p> <p>Areas of Growth and Regeneration: Where Areas of Growth and Regeneration overlap with allotments / specialist food growing land and land within higher flood risk zones (+/?); or where draft policy text specifically requires provision or enhancement of green infrastructure, receive a (+/?). Where an area is within a lower area of flood risk (Flood Risk area 1 or 2) and does not include allotment or specialist food growing land, the effects will be uncertain (?).</p>		This will utilise the existing adopted Strategic Green Infrastructure Network.	<p>Overlap with:</p> <ul style="list-style-type: none"> Greenways (published by 2013, updated 2018). Flood Risk Zones (SFRA 2011, EA Mapping and BCC Flood Zone 3 mapping). Surface Water Flooding 30yr, 100 yr, 1000yr (EA Updated Flood Mapping for Surface Water Data.gov.uk, GIS Accessed July 2023)¹⁵ Allotments (published by 2010, updated 2018). WENP Nature Recovery Network Layers (accessed July 2023)
Transport and Movement	13. To encourage a demonstrable modal shift and reduce the need to travel?	DMC28: Would development or policy offer an opportunity to improve access to and viability and quality of sustainable transport modes (walking, cycling and public transport) for all communities?	<p>Site Allocations: Sites have generally been selected through their proximity to sustainable transport. Developments will continue to be guided by emerging draft policies T1 and T3a.</p> <p>If the site is situated within all four of the distances listed below it is considered to have a significant positive effect (++); and for three of the distances below this would yield a positive effect (+).</p> <ul style="list-style-type: none"> Within 400m of a bus stop⁸ Within 800m of a train station⁹ On or adjacent to primary walking network/public rights of way routes On or adjacent to existing cycling network <p>If the site is not situated as per the criteria above, it is considered to have a neutral effect (0). Proposed upgrades to public transport or sustainable modes of transport may also render the effects as uncertain at this stage (?).</p> <p>Areas of Growth and Regeneration: The Bristol Transport Access Level (BrisTAL) provides a way of measuring the level of public transport connectivity within the city of Bristol. It is derived from the Public Transport Accessibility Level (PTAL) approach used by Transport for London. Commentary is provided to the relative accessibility of AGRs against the Bristol Transport Access Level. It is understood that this has been updated with the West of England Transport Model (WETRM)</p>		Distances are broadly consistent with approaches taken elsewhere and from CIHT guidance on planning for walking ¹⁰ . The ELSNA Summary considers that poor public transport to employment locations is a critical issue ¹¹ .	<p>DMC28: Mapping of:</p> <ul style="list-style-type: none"> Public rights of way (2016, updated 2018); Bus stops (2017, updated 2018); (Bus_stops_WoE Accessed July 2023) Railway stations (2011, updated 2018) (Accessed July 2023) Cycle networks, with 400m and 800m buffers applied. <p>All accessed from BCC pinpoint, July 2023. BrisTAL (2019)¹². Accessed July 2020.</p>
		DMC29: Would development or policy offer an opportunity to support the delivery of new transport (including for	<p>All new development has the potential to support the delivery of new transport and digital infrastructure in line with emerging policies.</p> <p>There are major transport schemes which are listed within the adopted JLTP 4 for the West of England, including MetroWest and Mass Transit options. Whilst adjacent sites may both support and benefit in the long-term from these schemes, given alignments are ‘corridor’ focussed and illustrative¹³, it is not possible to discern differences in the effects on sites. Effects therefore have the potential to be city-wide</p>		N/A	<p>DMC29: Consideration of JLTP4 mass transit schemes (illustrative corridor diagrams).</p>

⁸ For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000), whilst people will walk up to 800 metres to reach a railway station (CIHT, 2015)

⁹ For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000), whilst people will walk up to 800 metres to reach a railway station (CIHT, 2015)

¹⁰ https://www.ciht.org.uk/media/4462/ciht_-_planning_for_walking_document-12pp_v2_singles.pdf

¹¹ <https://www.westofengland-ca.gov.uk/wp-content/uploads/2021/11/ELSNA-summary.pdf>

¹² [http://data.bristol.gov.uk/geonetwork/srv/eng/catalog.search#/search?resultType=details&sortBy=relevance&fast=index&_content_type=json&from=1&to=3&any=BrisTAL+\(Bristol+Transport+Access+Level\)](http://data.bristol.gov.uk/geonetwork/srv/eng/catalog.search#/search?resultType=details&sortBy=relevance&fast=index&_content_type=json&from=1&to=3&any=BrisTAL+(Bristol+Transport+Access+Level))

¹³ Figure 11.1 JLTP4 Major Schemes: <https://www.westofengland-ca.gov.uk/wp-content/uploads/2021/10/JLTP4-Adopted-Joint-Local-Transport-Plan-4.pdf>

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		sustainable transport) and digital infrastructure?	and significant, albeit unknown until scheme detail is further determined and therefore effects are unknown with potential for significant effects (+/?).																																	
	14. To maintain and improve the existing highway network	<p>DMC30: Would development or policy likely maintain or reduce levels of traffic in an area already experiencing congestion issues?</p> <p>DMC31: Would development or policy offer an opportunity to enhance or improve the existing highway network?</p>	<p>All new development, unless required to be car-free which would otherwise be positive in effect, has the potential for increasing the number of vehicle journeys and therefore contributing to congestion issues in the city. Therefore, proposals are generally considered to score negatively with an unknown effect dependent upon the scale of development (-/?).</p> <p>Policies for Development and Transport, alongside policies to limit parking and increase cycling provision, will likely result in an overall positive effect on levels of vehicular movements associated with new development (+/?).</p>		N/A	N/A																														
Climate, Energy and Waste	15. To reduce the risk of flooding from all sources.	<p>DMC32: Would development or policy be directed towards lower flood risk areas and / or offer opportunities to significantly reduce flood risk?</p> <p>DMC33: Would development or policy support sustainable and resilient flood risk management?</p>	<p>National planning guidance sets out a requirement to take account of and address risks associated with flooding and coastal change in the planning process. This requires Local Planning Authorities to apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding is lowest, taking account of both climate change and the vulnerability of future uses to flood risk. Alternative development options must be considered within the Sustainability Appraisal, by considering flood risk, surface water run-off and the impact of development, alongside other planning objectives.</p> <p>Site Allocations: The aim should be to avoid locating new development in medium and high-risk flooding areas having regard to the sensitivity of the development to flooding. Using the Flood Risk Vulnerability Classification¹⁴, which has been adapted to an Annex within the NPPF¹⁵, the following table provides a guide for the assessment. Uncertainty is introduced where national planning policy requires an Exception Test to be completed or where the site exists within the 'Flood Defence Policy Area' (?).</p> <p>For development adjacent to main rivers, flood risk activity permits may be required for development of the site within 8m (for non-tidal main rivers) and 16m (for tidal main rivers). Mitigation is also likely to be take the form of measures within policies for flood risk and water management; development adjacent to waterways; development and flood risk and habitat preservation and creation of waterways.</p> <table border="1"> <thead> <tr> <th>Majority:</th> <th>Essential Infrastructure (transport / utilities)</th> <th>Highly Vulnerable (basement dwellings, mobile homes)</th> <th>More Vulnerable (Houses, residential institutions, non-residential uses for health and education)</th> <th>Less Vulnerable (retail uses and businesses)</th> <th>Water Compatible (flood control infrastructure, sewage works, ship building and maritime)</th> </tr> </thead> <tbody> <tr> <td>Flood Risk Zone 1</td> <td>(++)</td> <td>(++)</td> <td>(++)</td> <td>(++)</td> <td>(++)</td> </tr> <tr> <td>Flood Risk Zone 2</td> <td>(+)</td> <td>(- /?)</td> <td>(+/?)</td> <td>(+)</td> <td>(+)</td> </tr> <tr> <td>Flood Risk Zone 3a</td> <td>(- /?)</td> <td>(--)</td> <td>(- /?)</td> <td>(+)</td> <td>(+)</td> </tr> <tr> <td>Flood Risk Zone 3b</td> <td>(- /?)</td> <td>(--)</td> <td>(--)</td> <td>(--)</td> <td>(+)</td> </tr> </tbody> </table> <p>The assessment of alternatives in Appendix 4 seeks to apply the sequential test to alternative sites.</p> <p>Areas of Growth and Regeneration: Proposals for Areas of Growth and Regeneration are typically for a mix of uses, and therefore the table above is not as applicable. In addition, for larger areas, there may be more opportunities to mitigate and manage the risk of flooding. Therefore, GIS overlaps of flood risk layers have been used to highlight the scale of risk:</p> <ul style="list-style-type: none"> • Areas of Growth and Regeneration is within Flood Risk Zone 1 and there is a relatively low level of surface water flooding impacting the area (<20% in all categories) (0); • Areas of Growth and Regeneration is exposed to very high levels of flood risk 2, 3a or 3b (approximately 25% of the total AGR area or less) (-/?); • Areas of Growth and Regeneration is exposed to significant levels of flood risk 2, 3a or 3b (approximately 25% of the total AGR area or more) (-/?). 		Majority:	Essential Infrastructure (transport / utilities)	Highly Vulnerable (basement dwellings, mobile homes)	More Vulnerable (Houses, residential institutions, non-residential uses for health and education)	Less Vulnerable (retail uses and businesses)	Water Compatible (flood control infrastructure, sewage works, ship building and maritime)	Flood Risk Zone 1	(++)	(++)	(++)	(++)	(++)	Flood Risk Zone 2	(+)	(- /?)	(+/?)	(+)	(+)	Flood Risk Zone 3a	(- /?)	(--)	(- /?)	(+)	(+)	Flood Risk Zone 3b	(- /?)	(--)	(--)	(--)	(+)	<p>The approach taken here is consistent with National Planning Policy Guidance for siting more vulnerable development in areas of least risk. BCC are currently updating the evidence base for flooding in the city including a Strategic Flood Risk Assessment. A Level 1 SFRA has been published, and a Level 2 is expected shortly.</p>	<p>Overlap with:</p> <ul style="list-style-type: none"> • Flood Risk Zones (SFRA 2020) • Surface Water Flooding 30yr, 100 yr, 1000yr (EA Updated Flood Mapping for Surface Water) • Flood Defence Layers (Proposed Flood Defence Areas and Flood Defence Policy Area) (2023).
Majority:	Essential Infrastructure (transport / utilities)	Highly Vulnerable (basement dwellings, mobile homes)	More Vulnerable (Houses, residential institutions, non-residential uses for health and education)	Less Vulnerable (retail uses and businesses)	Water Compatible (flood control infrastructure, sewage works, ship building and maritime)																															
Flood Risk Zone 1	(++)	(++)	(++)	(++)	(++)																															
Flood Risk Zone 2	(+)	(- /?)	(+/?)	(+)	(+)																															
Flood Risk Zone 3a	(- /?)	(--)	(- /?)	(+)	(+)																															
Flood Risk Zone 3b	(- /?)	(--)	(--)	(--)	(+)																															
	16. Sustainably manage natural resources, including	DMC34: Would development or policy have a beneficial effect on water resources?	No data is readily available to enable GIS analysis of the site options in terms of water quality or water availability. Any new development is expected to result in water consumption during operation/use, however, it is anticipated that water saving measures will be part of good design, required by emerging policy. All sites are therefore considered to have a neutral effect on water resources (0).		N/A	N/A																														

¹⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone__compatibility_.pdf

¹⁵ Annex 3, NPPF (2023). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf

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	water demand and quality and reducing waste being landfilled.	DMC35: Would development or policy likely have a positive effect on water quality, and would it provide opportunity to improve water quality?	The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most types of development. However, for the purposes of assessment, distances have been categorised as: <ul style="list-style-type: none"> Site is situated away from vulnerable water bodies AND outside of a groundwater protection zone (0); and Site is situated within a ward adjacent to a vulnerable water body OR within a groundwater protection zone this has the potential for negative effects (-). 		N/A	Vulnerable waterbodies, nitrate vulnerable zones (2021) and groundwater source protection zones ¹⁶ .
		DMC36: Would development or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production?	No data is readily available to enable GIS analysis of the site options for their effect on energy efficiency and waste production. It is assumed that the construction of new development will require the use of some non-renewable materials and natural resources. The full effect will be unknown until further details on the scale, design, and layout of the development is defined through any future planning application. Taking the above into account, it is considered that all the sites have a neutral effect (0).		N/A	N/A
		DMC37: Would development or policy maximise opportunities to support sustainable urban food production?	Site Allocations and Areas of Growth and Regeneration: Sustainable urban food production is fundamental to the sustainability of future food security. Draft Policies FS1, FS2 and FS3 recognise the multi-functional role of the City's green infrastructure, including its role in food production. Sites and Areas of Growth and Regenerations will therefore be assessed against the following guides: <ul style="list-style-type: none"> Where an element of space is designated for food production (+ /?) or draft policy supporting text requires allotment provision (+/?); Where a site or Areas of Growth and Regeneration is proposed on areas of good agricultural land (Excellent Agricultural Land Classification (ALC) Grade 1 or Very Good ALC Grade 2) or previous allotment land (-), and no provision is made for allotments or specialist food growing land within the draft policy (-). 		National planning policies require the best and most versatile (BMV) agricultural land to be enhanced.	ALC mapping (particularly Grade 1 and 2) (2019, accessed July 2023) ¹⁷ ; and current and former allotment land (published by BCC 2010, updated 2018).
	17.Minimise air and noise pollution	DMC38: Would development minimise exposure to pollution or offer opportunity to reduce pollutions?	Site Allocations and Areas of Growth and Regeneration: The Bristol AQMA covers the city centre including arterial routes. Sites within an AQMA, without appropriate mitigation, could expose new development to areas in breach of health-based exposure criteria (--/?). As before, for the purposes of the assessment, sites which are in an AQMA or cumulative impact zone are therefore considered to achieve a (-) score, whilst sites outside an AQMA achieve a (0) score.		This approach is consistent with objectives to increase efficient use of land, including densities assumed within Urban Potential assessment.	Bristol AQMA boundary (published 2017, accessed July 2023); Cumulative Impact Areas; Clean Air Zone layers (date); and layers relating to Urban Potential densities (2016)
	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	DMC39: Would development or policy enable aspirational targets for energy efficiency to be achieved?	It is assumed that new development will need to meet required energy efficiency targets. However, effects are uncertain until further details on the scale, design, and layout of the development are known. Taking the above into account, it is considered that all the sites therefore have a neutral effect (?).		N/A	N/A
		DMC40: Would development or policy provide opportunities for a net gain in renewable energy production and zero carbon energy supply within the Plan area?	All new development would have the potential for renewable energy production, however, effects are uncertain until further details of the development are known. As such, it is considered that all sites have an unknown effect at this stage (?).		N/A	N/A
		DMC41: Would development or policy provide opportunities for the use of low carbon and decentralised energy sources (including energy networks)?	Site Allocations and Areas of Growth and Regeneration: Assessment criteria have been categorised as: <ul style="list-style-type: none"> Site is located within the City LEAP Heat Network, therefore there is potential for the development to be connected to this low carbon network (+); and Site is located outside of the City LEAP Heat Network, therefore it is considered that this will have a neutral effect as the development of the site may offer opportunities which are unknown (?). 		Based on opportunity to connect to Bristol's heat network if within the Heat Priority Area.	City LEAP Heat Network (2023 ¹⁸) map on Bristol City Leap website, accessed August 2023)
		DMC42: Would development or policy increase resilience to the effects of climate change?	All new development would have the potential to increase resilience to the effects of climate change (through provision of sustainable urban drainage systems, green infrastructure on site, energy efficient design etc.) however, opportunities to differentiate between sites are as yet unknown. All sites are therefore considered to have an unknown effect at this stage (?).		N/A	N/A

¹⁷ https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-43.957%2C48.023%2C39.671%2C57.306

¹⁸ <https://www.bristolcityleap.co.uk/heat-networks/>