

**Appendix 4: Predicting and evaluating the effects of Publication Version November  
2023 Draft Local Plan Sites (Task B3)**

## **Predicting and evaluating the effects of the Pre-Submission Publication Version November 2023 Draft Local Plan Residential and Employment Site Allocations (Task B3)**

### **1.1 Introduction**

Using the detailed site assessment framework set out within Appendix 2, the purpose of this stage is to predict and evaluate the social, economic and environmental effects of:

- Draft Site Allocations (Draft Policy DA1) and Draft Development Allocations in the Green Belt (Draft Policy DS11 and DS12);
- Industry and Distribution Areas (IDAs) and Maritime Industrial and Warehousing Areas (MIWA) (Policy E4); and,
- Avonmouth Industrial Area (ASAs) and Bristol Port (Draft Policy E5).

Reasonable alternatives must be another way of fulfilling the plan or programme objectives. The final section of this Appendix therefore considers potential reasonable alternatives, including discounted draft site allocations which were published in the March 2019 Consultation Draft. These could, in theory, support different realistic options considered by BCC in developing policies within the Local Plan. Additional sites considered to be 'reasonable', but not forming part of the overall plan strategy, may also be considered prior to adoption.

For the purposes of retained Site Allocations from both the Site Allocations and Development Management Policies Local Plan (2014) and the Bristol Central Area Plan (2015), it is not considered necessary nor proportionate to reappraise the sustainability effects of these sites beyond that which was undertaken as part of the Bristol Central Area Action Plan Sustainability Appraisal February 2012 and Site Allocations and Development Management Policies Sustainability Appraisal 2013. This approach is broadly supported by the Planning Practice Guidance which indicates that the SA does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan. It is also supported by the SEA Directive which seeks to reduce duplication of assessment, and to take account of assessments carried out at different levels of the hierarchy of plans and programmes.

### **1.2 Methodology and assumptions for predicting and evaluating the effects of the site allocations and limitations and difficulties encountered**

The methodology, assumptions, limitations and difficulties are set out within Appendix 2. Sites considered are set out in Section 2.

## 2. Draft Residential Site Allocations

### 2.1 Overview of Draft and Adopted Site Allocations

The following table sets out the approach to assessment of residential site allocations within Appendix 4, and those existing adopted site allocations appraised through previous SA reports, including the Bristol Central Area Action Plan Sustainability Appraisal February 2012 and Site Allocations and Development Management Policies Sustainability Appraisal 2013.

**Table 1 Approach to assessment of Residential Site Allocations**

Site reference	Site Address	Site Type	Ward	Appraised in this 2023 SA Report	Appraised in previous SA Reports
BDA0103	Land at Cheltenham Road / Bath Buildings, Montpelier	Draft Allocation	Ashley	✓	
BDA0105	Land to the rear of 64-68 Stokes Croft, St. Paul's	Draft Allocation	Ashley	✓	
BDA0302	Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road	Draft Allocation	Bedminster	✓	
BDA0304	1-25 Bedminster Down Road, Parson Street	Draft Allocation	Bedminster	✓	
BDA0305	233-237 West Street, Bedminster	Draft Allocation	Bedminster	✓	
BDA0401	Land at Gloucester Road / Merton Road, Horfield	Draft Allocation	Bishopston & Ashley Down	✓	
BDA0601	Land at Latimer Close, Brislington	Draft Allocation	Brislington East	✓	
BDA0702	Land at Marmalade Lane (south), Brislington	Draft Allocation	Brislington West	✓	
BDA0703	Land at Marmalade Lane (north), Brislington	Draft Allocation	Brislington West	✓	
BDA0801	The Grove & Prince Street Car Park, Harbourside	Draft Allocation	Central	✓	
KS10 / BDA0802	Redcliffe Way	Draft Allocation	Central	✓	
BDA0901	2-16 Clifton Down Road	Draft Allocation	Clifton	✓	
BDA1001	Land west of Hampton Lane, Clifton Down	Draft Allocation	Clifton Down	✓	
BDA1002	Land at Whiteladies Gate, Clifton Down	Draft Allocation	Clifton Down	✓	
BDA1003	Land adjacent Alma Vale Road and Alma Court	Draft Allocation	Clifton Down	✓	
BDA1004	Barley House, Oakfield Grove	Draft Allocation	Clifton Down	✓	
BDA1101	Land at Gibson Road	Draft Allocation	Cotham	✓	
BDA1102	Land at Sydenham Lane	Draft Allocation	Cotham	✓	
BDA1201	16-20 Fishponds Road, Easton	Draft Allocation	Easton	✓	
BDA1301	Stapleton Cricket Club	Draft Allocation	Eastville	✓	
BDA1302	Land south of Rose Green Close, Eastville	Draft Allocation	Eastville	✓	
BDA1303	Land at Hendys Yard, Lower Grove Road	Draft Allocation	Eastville	✓	
BDA1304	Land to the rear of Rose Green Road, Eastville	Draft Allocation	Eastville	✓	
BDA1305	525 Stapleton Road, Fishponds	Draft Allocation	Eastville	✓	
BDA1401	Previously developed land at Hartcliff Way, Bedminster	Draft Allocation	Filwood	✓	
BDA1402	Previously developed land to the west of Redford House, Nover's Hill	Draft Allocation	Filwood	✓	
BDA1501	Land at College Road, Fishponds	Draft Allocation	Frome Vale	✓	
BDA1601	Land to the rear of 96 Church Road/ Orchard Drive, Bishopsworth	Draft Allocation	Hartcliffe & Withywood	✓	
BDA1702	14 Wyck Beck Road, Brentry	Draft Allocation	Henbury & Brentry	✓	
BDA1901	Land at the corner of Lodge Causeway / Berkeley Road, Fishponds	Draft Allocation	Hillfields	✓	
BDA2001	3 Kelston Road	Draft Allocation	Horfield	✓	
BDA2002	272-276 and 290-298 Southmead Road	Draft Allocation	Horfield	✓	
BDA2101	94-96 & 119 Cumberland Road, Spike Island	Draft Allocation	Hotwells & Harbourside	✓	
BDA2102 / CFS23001	Maritime Heritage Centre Public Car Park, Gas Ferry Road	Draft Allocation	Hotwells & Harbourside	✓	
BDA2301	Land to the south of Warwick Road / Oxford Place, Easton	Draft Allocation	Lawrence Hill	✓	
BDA2302	Former Barton Hill Nursery School, Queen Ann Road, St Philips	Draft Allocation	Lawrence Hill	✓	
BDA2401	Bridge Farm, Land at South Hayes, Lockleaze	Draft Allocation	Lockleaze	✓	
BDA2501	33 Zetland Road,	Draft Allocation	Redland	✓	

Site reference	Site Address	Site Type	Ward	Appraised in this 2023 SA Report	Appraised in previous SA Reports
BDA2502	Land at Cossins Road, Redland	Draft Allocation	Redland	✓	
BDA2601	Land at Two Mile Hill Road / Charlton Road, St George	Draft Allocation	St George Central	✓	
BDA2602	81-83 Two Mile Hill Road, St George	Draft Allocation	St George Central	✓	
BDA2603	Land at Two Mile Hill Road / Waters Road, St George	Draft Allocation	St George Central	✓	
BDA2605	Land at Broad Road / Lodge Road, St George	Draft Allocation	St George Central	✓	
BDA2702	Land at corner of Bryants Hill and Furber Road, St George	Draft Allocation	St George Troopers Hill	✓	
BDA2703	Land at Nags Head Hill, St George	Draft Allocation	St George Troopers Hill	✓	
BDA2801	Land to the south of Blackswarth Road, Avonview	Draft Allocation	St George West	✓	
BDA2802	Part of Soaphouse Industrial Estate, Howard St	Draft Allocation	St George West	✓	
BDA2803	222-232 Church Road, St. George	Draft Allocation	St George West	✓	
BDA2901	Land at Lanercost Road	Draft Allocation	Southmead	✓	
BDA2902	Works at Felstead Rd	Draft Allocation	Southmead	✓	
BDA3002	1-7 Smyth Road, Southville	Draft Allocation	Southville	✓	
BDA3101	Greville EPH, Lacey Road, Stockwood	Draft Allocation	Stockwood	✓	
BDA3201	Land at Sanctuary Gardens, Sneyd Park	Draft Allocation	Stoke Bishop	✓	
BDA3301 / CFS23003	Former St Ursula's Academy, Brecon Road, Westbury-on-Trym	Draft Allocation	Westbury-on-Trym & Henleaze	✓	
BDA3401	122 Bath Road, Totterdown, Bristol	Draft Allocation	Windmill Hill	✓	
BSA0103	Land to the west and south-west of Deering Close, Lawrence Weston	Existing Allocation	Avonmouth & Lawrence Weston		✓
BSA0111	Land off Ermine Way, Shirehampton	Existing Allocation	Avonmouth & Lawrence Weston		✓
BSA0212	19-21 Pen Park Road, Southmead	Existing Allocation	Southmead		✓
BSA0302	Coombe House Elderly Persons' Home, Westbury-on-Trym	Existing Allocation	Westbury-on-Trym & Henleaze		✓
BSA0404	BT Depot, Filton Road, Horfield	Existing Allocation	Horfield		✓
BSA0502	Glenside Campus, Blackberry Hill, Fishponds	Existing Allocation	Frome Vale		✓
BSA0513	Garage site, Woodland Way, Chester Park / Hillfields	Existing Allocation	Hillfields		✓
BSA0802	Shiner Ltd Builders Merchants, Church Road, Redfield	Existing Allocation	Easton		✓
BSA0803	Land at Junction of Church Road and Heber Street, Redfield	Existing Allocation	Easton		✓
BSA0906	Car Sales site at 62-74 Bell Hill Road, St George	Existing Allocation	St George Central		✓
BSA0907	47 - 49 Summerhill Road, St George	Existing Allocation	St George Central		✓
BSA1011	Site adjacent to Holy Cross Church, Dean Lane, Bedminster	Existing Allocation	Southville		✓
BSA1101	Bath Road Open Space (west of Totterdown Bridge), Totterdown	Existing Allocation	Windmill Hill		✓
BSA1103	Red Lion Works, Greenleaze Road / Wells Road, Knowle	Existing Allocation	Knowle		✓
BSA1108A	Previously developed land at Novers Lane, east of Hartcliffe Way and west of Novers Lane	Existing Allocation	Filwood		✓
BSA1109	Land adjoining Hartcliffe Way and Hengrove Way, Innâ€™s Court.	Existing Allocation	Filwood		✓
BSA1115	Former Florence Brown school, west of Leinster Avenue	Existing Allocation	Filwood		✓
BSA1116	Open spaces either side of Inns Court Drive	Existing Allocation	Filwood		✓
BSA1118	Broad Plain House and associated land, Broadbury Road	Existing Allocation	Filwood		✓
BSA1120	Land and buildings between 2 to 20 Filwood Broadway	Existing Allocation	Filwood		✓
BSA1122	Sports court and former swimming pool site on the north-east corner of the Filwood Broadway and Cre*	Existing Allocation	Filwood		✓
BSA1123	Filwood Library and adjoining land, Filwood Broadway	Existing Allocation	Filwood		✓
BSA1207	493-499 Bath Road, Kensington Park, nr Arno's Vale	Existing Allocation	Brislington West		✓
BSA1305	Land to the north-west of Vale Lane, Bedminster Down	Existing Allocation	Bishopsworth		✓
BSA1402	Former New Fosseway School, Hengrove	Existing Allocation	Hengrove & Whitchurch Park		✓
SA101	Wapping Wharf, Wapping Road	Existing Allocation	Central		✓
SA102	Waterfront Site, Millennium Square	Existing Allocation	Hotwells & Harbourside		✓
SA202	Land to the west of Lodge Street	Existing Allocation	Central		✓
SA301	55-59 St. Michael's Hill	Existing Allocation	Central		✓

Site reference	Site Address	Site Type	Ward	Appraised in this 2023 SA Report	Appraised in previous SA Reports
SA403	Old Seaman's Chapel, Royal Oak Avenue	Existing Allocation	Central		✓
SA404	Gap site, 16 Narrow Quay	Existing Allocation	Central		✓
SA501	Lakota Nightclub / Former Coroner's Court, Upper York Street / Backfields	Existing Allocation	Ashley		✓
SA506	97-101 Stokes Croft	Existing Allocation	Central		✓
SA507	27-33 Jamaica Street	Existing Allocation	Central		✓
SA509	Land at Wilder Street / Argyle Road	Existing Allocation	Ashley		✓
SA510	Land at Dove Lane / Ervine Terrace / Wilson Place / Cheapside	Existing Allocation	Ashley		✓
SA511	F C Hammonds 13-17 Dove Lane St Pauls	Existing Allocation	Ashley		✓
SA512	109 - 119 Newfoundland Road	Existing Allocation	Ashley		✓
SA608	Land and buildings at Victoria Street / Temple Street	Existing Allocation	Central		✓
SA610	Railway cutting, Lower Guinea Street	Existing Allocation	Central		✓
SA612	The Bell and adjoining buildings, Prewett Street	Existing Allocation	Central		✓

## 2.2 Assessment and Evaluation of Effects

### **SA Objective 1 - To ensure an adequate and diverse supply of housing that is affordable to everyone**

For SA Objective 1, almost all sites are considered to generate minor positive effects for DMC1 given their allocation for residential or mixed-use development. Sites for which capacity and uses are to be determined through masterplanning processes are less certain in effects at this stage, albeit it is expected these will also be likely minor positive.

Similarly, for DMC2 in relation to the ability for sites to contribute to affordable housing, all sites where more than 10 residential dwellings are proposed result in a positive effect against this criteria. This assessment outcome is consistent except for BDA0302, BDA0801, BDA0802 and BDA2101, where estimated capacity for the site is not yet available however is likely to be of a scale where affordable housing is required.

Several sites are considered to generate significant positive effects for both DMC3 and DMC4 where alternative delivery methods of housing (including community-led housing) or housing to meet the needs of specific community groups is proposed (i.e., homes for older people) as part of the draft site allocation. This is also the case for DS11C and DS12 which are specifically identified within Draft Policy H5 as contributing at least 5% of homes to self-build / custom housebuilding or community-led housing. All remaining sites are considered to be neutral under these criteria, although the draft site allocation does not preclude delivery of development using alternative delivery mechanisms.

Overall effects against this objective are considered direct, permanent and city-wide in effect. No mitigation or additional recommendations are proposed above those considered in Appendix 3 for the housing policies (Draft Policies H1-H7; H8; BTR1 and AH1).

### **SA Objective 2 - Promote the conservation and wise use of land, maximising the reuse of previously developed land**

The draft site allocations are considered to produce mixed sustainability effects when appraised against DMC5, which assesses the extent to which the allocation would provide an opportunity for the reuse of brownfield land. Several sites are appraised as having minor to significant negative effects due to being proposed on, or partially overlapping with, existing adopted Important Open Space designations. However, these do include BDA0303 and BDA3301 / CFS23003 which overlap by no more than 10%. This is also the case with the three draft Green Belt site allocations (DS11A, DS11C and DS12), which demonstrate significant negative effects when assessed against DMC5 on the basis that these are large (over 0.5ha) and located on land designated as Green Belt.

The majority of sites are considered to have positive or significant positive effects or neutral effects when appraised against DMC6. Five site allocations are located within the City Centre, with a proposed density of 200 units per/hectare. The majority of site allocations are proposed within either the 'more intensive' categories of the Inner Urban Area or Outer Urban Area, with only three draft site allocations and three draft Green Belt site allocations within the Outer Urban Area. Collectively, the draft site allocations do generally provide opportunities for higher densities within sustainable locations and therefore contribute to this Objective.

The majority of sites achieved a neutral score against DMC7, which seeks to maintain greenfield land and the openness / permanence of the Green Belt. Several site allocations are proposed on greenfield land (including adopted Important Open Space sites) or Green Belt land, and are therefore graded as minor negative or significant negative accordingly. One draft site allocation (DS11B) no longer proposed through the Pre-Submission Publication Version was on existing Green Belt land; these are considered within Section 4 of this Appendix.

### **SA Objective 3 - Ensure easy and affordable access to key services**

The majority of site allocations perform positively when appraised against DMC8 of SA Objective 3, given the relatively even distribution of centres and site allocations across the city.

Two draft site allocations and a draft Green Belt site allocations are considered to generate minor negative effects under DMC8, as these are proposed in locations that are over 800m from even the smallest centres ('local centres'). Appropriate mitigation recommendations include improving accessibility to, and connections with, local centres or allowing for elements of mixed use on site if appropriate.

### **SA Objective 4 - Increase participation in cultural and community activities**

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 (?).

### **SA Objective 5 - To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage**

Several draft site allocations are considered to generate minor or significant positive sustainability effects under DMC10 and DMC11 as sites are proposed within areas of high deprivation (using the Indices of Multiple Deprivation Index data, where deciles 1-3 were considered to form the top 30% most deprived Lower Super Output Areas). Such effects are likely to generate cumulative benefits for the built environment where site allocations are concentrated in wards including Ashley, Bedminster, Brislington and Filwood, amongst others. However, a high proportion of site allocations are considered to generate neutral effects as they are proposed within areas of moderate or low deprivation. Overall, effects are likely to be subject to implementation.

### **SA Objective 6 - To reduce health inequalities and promote healthy lifestyles across the city**

A total of 28 residential site allocations are proposed within AQMAs or associated cumulative air quality impact zones – this includes sites located within Ashley, Bedminster, inner urban areas such as Clifton and Cotham, Knowle and Lawrence Hill. As such, these sites are considered to have potential for minor negative effects for health (DMC12), without either appropriate mitigation or significant improvement to the existing air quality environmental baseline. It is therefore recommended that sites in such areas are promoted with robust technical evidence and include references to policies relating to air quality mitigation (Publication Draft Policy HW2).

All residential site allocations are proposed within 400m of an emerging Local Green Space or Reserved Open Green Space designation, and therefore are considered to produce significant positive effects when appraised against DMC13 of the framework. As the assessment is based on an

‘as the crow flies’ distance, access to these spaces is likely to be further in some instances where there is no direct walking route (i.e., draft site allocations on Spike Island)

Almost all draft site allocations perform significantly positively against DMC14 as the majority are adjacent to key walking routes and are adjacent to the existing or proposed cycling network enhancements. Only two sites are not located within 400m of existing adopted Public Rights of Way: one of which, BDA1301, is located within Stockwood and which otherwise does not benefit from high levels of existing accessibility.

A large proportion of proposed draft site allocations benefit from good access to ‘Strategic Cycle Networks’, with around 20 allocations being located more than 400m from a Strategic Route.

### **SA Objective 7 - Ensure access to education and learning for all sections of society**

As details related to planning obligations remain unknown until submission and determination of a relevant application, it is unclear whether draft site allocations would generate a ‘net gain’ in educational facilities (DMC15). However, as development of the draft site allocations has the potential to contribute to the delivery of educational facilities across the plan area (through Publication Draft Policy IDC1), it is considered that the majority of sites could generate positive, unknown effects for DMC15.

The majority of sites are located within 800m distances of primary or infant schools and 1500m of secondary-based educational facilities (including special schools) However, one draft site allocation (BDA3201) is located beyond the relevant distance thresholds for primary and secondary schools (800m and 1500m respectively), and therefore results in a minor negative effect against DMC15. Whilst a small number of sites are beyond the 1500m accepted distances for travel to secondary education (DMC16), a very large number of sites are beyond the accepted travel distances for Nurse and SEN education. It is recommended that development contributions consider requirements to meet future educational needs as a result of planned development at this site and support accessibility to existing facilities.

### **SA Objective 8 - To support the economy and ensure that there are suitable opportunities for employment**

None of the draft site allocations were appraised against this Objective. Whilst some of the draft site allocations may include employment space as part of mixed used development, these were not considered likely to generate significant / noticeable sustainability effects when appraised against the relevant decision-making criteria for SA Objective 8.

### **SA Objective 9 - Ensure access to a range of shopping facilities for all sections of society**

The majority of draft site allocations are likely to generate minor positive or neutral sustainability effects for the vitality and/or viability of existing local centres (DMC22), as all mixed-use sites are within located 800m of a town, district or local centre, and the vast majority residential sites are situated within 800m of a local centre at least. These sites are therefore considered to have the potential to generate positive economic multiplier effects for retail facilities and/or community facilities.



Only BDA1302, BDA1304 and DS11A are located beyond accepted walking distances to town, district and local centres and are therefore considered to have a neutral effect.

**SA Objective 10 - To ensure the protection and enhancement of the historic environment and its setting**

The majority of draft site allocations could have potential for minor positive or neutral sustainability effects for the historic environment (DMC24). A total of 23 draft site allocations and one draft Green Belt site allocation are located within Conservation Areas, and three sites contain or border other designated heritage assets. For these draft site allocations, draft development considerations include reference to the requirement for conservation and enhancement of these assets. While the potential impact of site development is difficult to determine in the absence of detailed design proposals, it is considered that embedding the requirement for sensitive design and including reference to draft policy addressing conservation and enhancement of the historic environment would continue to safeguard and potentially improve the existing environmental baseline.

One site, BDA2101 *The Grove and Prince Street Car Park, Harbourside* does exhibit an uncertain overall effect against this Objective on the basis that development considerations do not reference the City Docks Conservation Area (located on the sites' southern boundary).

**SA Objective 11 - To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats**

No draft site allocations overlap with any of the international or national statutory habitat sites or ecological designations. No draft site allocations overlap with Ancient Woodland designations.

All draft site allocations overlap with SSSI Impact Zones. Specifically, a number of proposed allocations (BDA0302; BDA0303; BDA1301; BDA1302; BDA1401; DS11A; DS11C; DS12) fall within these SSSI impact zones and are larger, or have the potential to be larger, than 50 units. These will require consultation with the relevant statutory nature conservation bodies to further determine the effect of development within these locations.

In terms of local ecological sites, BDA0802 includes a minor overlap with a Regionally Important Geological Site (RIGS) ('Alfred Quay, Phoenix Wharf') and BDA2401 is directly adjacent to the 'Stoke Park' RIGS. Five draft site allocations (BDA0303, BDA0601, BDA0702, BDA2401, DS11A) partially overlap with a local Site of Nature Conservation Interest (SNCI) designations, and three draft site allocations (DS12, BDA1402 and BDA2801) are within 10m of SNCIs which could introduce negative effects in the absence of appropriate mitigation. Only one draft site allocation (BDA2101) is located within 20m of a Local Nature Reserve.

Several other sites also have partial overlaps with strategic woodland network areas as identified within the West of England Nature Partnership Nature Recovery Network. For sites with partial or full overlap with local ecological or geological sites, it is considered that the draft development considerations should contain adequate reference to mitigation and/or requirement for enhancement of such areas. The effect in these cases is negative uncertain.

**SA Objective 12 - To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation**

Several site allocations include development considerations within supporting policy text to retain existing or provide enhancement of green infrastructure (e.g. adjacent green space and/or trees subject to TPOs).

Sites that are located adjacent to two or more of the following: allotment land, greenways, within West of England Nature Partnership habitat 'opportunity areas', or within higher flood risk areas have potential minor positive effects for DMC27 through opportunities to provide multi-functional green infrastructure provision. As these tend to be located across the city, these should be reflected within the associated relevant development considerations.

For the remaining site allocations, the provision of new green infrastructure is unknown as it is subject to the development delivered.

**SA Objective 13 - To encourage a demonstrable modal shift and reduce the need to travel**

In terms of whether site allocations would improve access to and quality of sustainable modes of transport, appraisal results are comparable to DMC14 (SA Objective 6) however also account for proximity to public transport. Draft site allocations demonstrate significant positive effects where these are within 400m of a bus stop, 800 of a train station, adjacent to a primary walking network and cycling network. This is generally the case for those sites located on arterial transport corridors within the City. Only one site (BDA3101) demonstrates a neutral effect when assessed against the framework, on the basis that it is not adjacent to any PRow nor train station.

There are major transport schemes which are listed within the adopted JLTP4 for the West of England, including MetroWest and Mass Transit options. Given alignments are 'corridor' focussed and illustrative, it is not possible at this stage to set out exactly which sites will be impacted until scheme detail becomes clearer. Effects of site allocations are therefore currently unknown for DMC29 with potential for significant effects (++ /?).

**SA Objective 14 - To maintain and improve the existing highway network**

While existing congestion / traffic data did not form part of the assessment, it is considered that collectively, the draft site allocations do have the potential to increase the level of congestion above the existing baseline. Effects are also unknown at this stage, as the uptake of active travel use or public transport modes may help to alleviate additional trip generation.

Draft Policies for Development and Transport, including those to limit parking and increase cycling provision, will likely result in an overall positive effect on levels of vehicular movements associated with new development and therefore effects for DMC31 are minor positive, however unknown dependent on the design of proposals coming forward on allocated sites (+/?).

**SA Objective 15 - To reduce the risk of flooding from all sources**

Overall, the majority of site allocations are directed towards areas of lower flood risk and would therefore produce minor or significant positive effects for DMC32.

Eight site allocations and two draft Green Belt site allocations are located partly within Flood Risk Zone 3a or 3b and are therefore considered to have potential for significant negative effects without adequate mitigation in place, on the basis that development proposed is majority 'more vulnerable' in type. Two sites fall within the Flood Defence Policy area (BDA2801 and BDA2101) and as such effects are partly unknown, though where there are clear policy ambitions for improvement in flood infrastructure. For all of these sites, corresponding developer considerations require proposals to be supported by a site-specific flood risk assessment and a drainage strategy, which will be expected to prioritise sustainable drainage systems, ensure no increased flood risk and provide appropriate mitigation.

Draft site allocations must consider the Sequential Test prior to allocation. This requires development to be located within the areas at lowest risk first, which requires a consideration of discounted alternative sites in lower areas of risk prior to the application of the Exception Test.

### **SA Objective 16 - Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled**

All draft site allocations are considered to be unknown in their sustainability effects for several decision-making criteria under SA Objective 16 (DMC34 and DMC36), based on the extent to which development would minimise resource use and waste production, while increasing energy efficiency of development, is dependent upon final constructed design / operation, directed by other Local Plan policies.

Whilst all water bodies within the Plan area have a chemical 'fail' status (those that are currently classified by the Environment Agency as 'Poor' or 'Bad' in status<sup>12</sup>), there are no groundwater Source Protection Zones (SPZs) or Nitrate Vulnerable Zones (NVZs) (DMC35) identified within the Plan area, based upon latest available Defra mapping<sup>3</sup>. All development would be required to take account of its potential impact on pollution and impact of existing sources of pollution by emerging draft policy HW1, and therefore effects are likely to be neutral.

The draft policy text for two site allocations (BDA0601; BDA0703) and one draft Green Belt site includes the requirement to maintain and enhance the integrity and connectivity of existing allotment land, either within the site boundary or immediately adjacent. It is considered that such sites therefore have the potential to enhance the urban food growing opportunities across the plan area and produce positive effects for DMC37. Otherwise, all other draft site allocations are identified on Agricultural Land Classification 'urban' or 'non-agricultural', with the draft Green Belt Site allocations identified as Grade 3 Agricultural Land.

### **SA Objective 17 - Minimise air and noise pollution**

A total of 27 draft residential site allocations are proposed within AQMAs or their cumulative air quality impact zones – this includes sites located within Ashley, Bedminster, inner urban areas such

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<sup>3</sup><https://environment.data.gov.uk/DefraDataDownload/?mapService=EA/SourceProtectionZonesMerged&Mode=spatial>

as Clifton and Cotham, Knowle and Lawrence Hill. As such, these sites are considered to have potential for minor negative effects for SA Objective 17 in relation to minimising exposure to air and/or noise pollution (DMC38), without either appropriate mitigation or significant improvement to the existing air quality environmental baseline. It is therefore recommended that sites in such areas include references to policies relating to air quality mitigation (Publication Draft Policy HW2).

**SA Objective 18 - To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built and natural environment and its communities can withstand the effects of climate change.**

All draft site allocations are considered to be unknown in their sustainability effects for several decision-making criteria under SA Objective 18 (DMC39, DMC40, DMC42), because the extent to which development would reach energy efficiency targets, climate resilient design and/or use of renewable energy is dependent upon final constructed design / operation and is directed by other Local Plan policies.

Under DMC41, several site allocations are likely to generate minor positive effects as they are located in existing District Heat Network Areas, which means that such sites are able to access low-carbon heat energy sources for any future development.



Site ref	Site Address	SA Objectives																																											
		1				2			3	4	5		6			7		8					9		10	11		12	13		14		15			16				17	18				
		DMC1	DMC2	DMC3	DMC4	DMC5	DMC6	DMC7	DMC8	DMC9	DMC10	DMC11	DMC12	DMC13	DMC14	DMC15	DMC16	DMC17	DMC18	DMC19	DMC20	DMC21	DMC22	DMC23	DMC24	DMC25	DMC26	DMC27	DMC28	DMC29	DMC30	DMC31	DMC32	DMC33	DMC34	DMC35	DMC36	DMC37	DMC38	DMC39	DMC40	DMC41	DMC42		
BDA2501	33 Zetland Road,	+	+	0	0	+	+	0	++	?	0	0	-	++	++	+/?	+							+	+	+/?	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	0	-	?	?	?	?
BDA2502	Land at Cossins Road, Redland	+	+	0	0	+	+	0	++	?	0	0	0	++	++	+/?	+							+	+	+/?	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2601	Land at Two Mile Hill Road / Charlton Road, St George	+	+	0	0	++	+	0	++	?	0	0	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2602	81-83 Two Mile Hill Road, St George	+	+	0	0	+	+	0	++	?	0	0	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2603	Land at Two Mile Hill Road / Waters Road, St George	+	+	0	0	+	+	0	++	?	++	++	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2605	Land at Broad Road / Lodge Road, St George	+	+	0	0	+	+	0	++	?	+	+	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2702	Land at corner of Bryants Hill and Furber Road, St George	+	+	0	0	+	+	0	++	?	0	0	0	++	++	+/?	+							+	+	0	-/?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2703	Land at Nags Head Hill, St George	+	+	0	0	+	+	0	++	?	0	0	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2801	Land to the south of Blackwarth Road, Avonview	+	+	0	0	++	+	0	++	?	++	++	0	++	++	+/?	+							+	+	+/?	-/?	?	+/?	+	++/?	-/?	+/?	-/?	?	0	0	0	0	0	0	?	?	?	?
BDA2802	Part of Soaphouse Industrial Estate, Howard St	+	+	0	0	+	+	0	++	?	0	0	-	++	++	+/?	+							+	+	0	-/?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	-	?	?	?	?
BDA2803	222-232 Church Road, St. George	+	+	0	0	+	+	0	++	?	++	++	-	++	++	+/?	+							+	+	0	-/?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	-	?	?	?	?
BDA2901	Land at Lanercost Road	+	+	++	0	--	+	-	++	?	+	+	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2902	Works at Felstead Rd	+	+	0	0	+	+	0	++	?	+	+	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	-/?	?	0	0	0	0	0	0	?	?	?	?
BDA3002	1-7 Smyth Road, Southville	+	+	0	0	+	+	0	++	?	0	0	0	++	++	+/?	+							+	+	0	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA3101	Greville EPH, Lacey Road, Stockwood	+	+	0	0	++	+	0	+	?	0	0	0	++	+	+/?	+							+	+	0	?	?	?	0	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA3201	Land at Sanctuary Gardens, Sneyd Park	+	+	0	0	++	0	0	+	?	0	0	0	++	++	-/?	-							+	+	+/?	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA3401	122 Bath Road, Totterdown, Bristol	+	+	0	0	+	+	0	++	?	++	++	-	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	-	?	?	+	?
BDA2101	94-96 & 119 Cumberland Road, Spike Island	+	+	0	0	+	++	0	++	?	0	0	-	++	++	+/?	+							+	+	+/?	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	-	?	?	+	?
BDA2401	Bridge Farm, Land at South Hayes, Lockleaze	+	+	++	++	--	+	-	+	?	0	0	-	++	++	+/?	+							+	+	+/?	-/?	?	+/?	+	++/?	-/?	+/?	-/?	?	0	0	0	0	0	-	?	?	?	?
BDA2002	272-276 and 290-298 Southmead Road	+	+	0	0	+	+	0	++	?	0	0	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?
BDA2102 / CFS23001	Maritime Heritage Centre Public Car Park, Gas Ferry Road, Bristol, BS1 6JL	+	?	0	0	+	++	0	++	?	0	0	-	++	++	+/?	+							+	+	+/?	?	?	?	+	++/?	-/?	+/?	-/?	?	0	0	0	0	0	-	?	?	+	?
BDA0801	The Grove & Prince Street Car Park, Harbourside, Bristol, BS1 4RB	+	?	0	0	+	++	0	++	?	0	0	-	++	++	+/?	+							+	+	?	?	?	+/?	+	++/?	-/?	+/?	-/?	?	0	0	0	0	0	-	?	?	+	?
BDA3301 / CFS23003	Former St Ursula's Academy, Brecon Road, Westbury-on-Trym, Bristol, BS9 4DT	+	+	0	0	-	+	-	++	?	0	0	0	++	++	+/?	-							+	+	+/?	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	0	?	?	?	?

2.4 Assessment of Draft Development Allocations in the Green Belt (Draft Policy DS11 and DS12)

Table 3 Assessment of Draft Development Allocations in the Green Belt (Draft Policy DS11 and DS12)

Site ref	Site Address	SA Objectives																																												
		1				2			3	4	5		6			7		8	9					10	11		12	13		14		15			16				17	18						
		DMC1	DMC2	DMC3	DMC4	DMC5	DMC6	DMC7	DMC8	DMC9	DMC10	DMC11	DMC12	DMC13	DMC14	DMC15	DMC16	DMC17	DMC18	DMC19	DMC20	DMC21	DMC22	DMC23	DMC24	DMC25	DMC26	DMC27	DMC28	DMC29	DMC30	DMC31	DMC32	DMC33	DMC34	DMC35	DMC36	DMC37	DMC38	DMC39	DMC40	DMC41	DMC42			
DS11A	Land at Ashton Gate	+	+	0	0	--	0	--	-	?	++	++	0	++	++	+/?	+							0	0	0	-/?	?	+/?	+	++/?	-/?	?	--	?	0	0	0	0	0	0	?	?	?	+	?
DS11B	Land at Yew Tree Farm, Bridgwater Road	?	?	0	0	--	0	--	-	?	0	0	0	++	++	+/?	-							0	0	-/?	-/?	?	?	+	++/?	-/?	?	++	?	0	0	0	0	0	0	?	?	?	?	
DS11C	Land adjacent to Elsbet Drive, Bishopsworth	+	+	++	++	--	0	--	+	?	0	0	0	++	++	+/?	+							+	+	0	?	?	?	+	++/?	-/?	?	++	?	0	0	0	0	0	0	?	?	?	?	
DS12	Bath Road, Brislington	+	+	++	++	--	0	--	+	?	++	++	-	++	++	+/?	-							+	+	-/?	-/?	?	+/?	+	++/?	-/?	?	-/?	?	0	0	0	+	-	?	?	?	?		

### 3. Draft Industry and Distribution Areas (IDAs), Maritime Industrial and Warehousing Areas (MIWAs) and Avonmouth Industrial Areas (ASAs)

#### 3.1 Assessment and Evaluation of Effects

**SA Objective 1 - To ensure an adequate and diverse supply of housing that is affordable to everyone – N/A**

**SA Objective 2 - Promote the conservation and wise use of land, maximising the reuse of previously developed land**

All draft Industry and Distribution Areas (IDA) and Maritime Industry Areas (MIWA) are considered to have potential to produce significant positive sustainability effects when appraised against DMC5, as they are all in excess of 0.5 hectares in area and are predominantly brownfield by virtue of their current employment use. In one case, an existing Principal Industrial and Warehousing Area (PIWA) in the adopted plan is proposed with amended boundaries so that greenfield land is no longer part of the proposed IDA site (IDA013). Other sites with adopted PIWA boundaries are amended so that adjacent brownfield land is no longer proposed to form part of the IDA (IDA019, IDA021, IDA028, IDA031, IDA036). One IDA (IDA028) includes a small area of greenfield land to the west.

The future development of IDA and MIWA would be directed by Draft Policy E4 requirements to make efficient use of land or enhance the existing function of maritime industrial areas. All draft IDA and MIWA sites are considered to have positive effects when appraised against DMC6, as they are all brownfield in character and are located within the accepted distances set by sustainable transport criteria. Since work on the Interim SA Report (2019) was undertaken, the Employment Land Strategic Needs Assessment (ELSNA) was published by WECA (2021) which identifies sub-markets with key employment locations. Several sites which maximise the efficient use of brownfield land that was previously in use for employment within employment locations identified within the ELSNA are considered to generate potential significant positive effects against DMC6. These site allocations typically include those surrounding the Temple Quarter Enterprise Zone and adjacent to the City Centre boundary<sup>4</sup>.

No draft IDA or MIWA sites are proposed on land designated as Green Belt nor areas of existing Important Open Space, and therefore no effects are identified when appraised against DMC7. Several IDAs are adjacent to proposed designations for Local Green Space (LGS) or Reserved Open Space (ROS) designations. Whilst the majority of these spaces are ROS and are typically land adjacent to railways or allotment land; there are a select number of IDAs that may have the potential to affect the public value of spaces (such as IDA006 or IDA022).

For Avonmouth employment site allocations ('ASAs'), sustainability effects against SA Objective 2 are considered to be significant negative and negative effects respectively for DMC5 and DMC7, given that these are large sites (in excess of 2ha) on greenfield land or predominantly greenfield land. Whilst all Avonmouth employment site allocations overlap with the Avonmouth Enterprise Area, as these are greenfield land, effects against DMC6 are generally likely to be neutral. In addition, some

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<sup>4</sup> <https://www.bristoltemplequarter.com/key-projects/location/>

of the sites have limited transport accessibility and therefore they also achieve unknown assessments against Objective 2 (DMC6). This is covered further within Objective 13 and DMC28.

**SA Objective 3 - Ensure easy and affordable access to key services – N/A**

**SA Objective 4 - Increase participation in cultural and community activities – N/A**

**SA Objective 5 - To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage**

Several draft IDA allocations are considered to generate positive sustainability effects under DMC10 and DMC11 as sites are proposed within areas of higher deprivation. Such effects are likely to generate cumulative benefits for the built environment where site allocations are concentrated in wards including Brislington and Hartcliffe. In addition, Avonmouth employment allocations (ASAs) are located within an area of high deprivation. It is considered that allocation for employment in these areas could offer potential for regeneration or investment in employment and any supporting infrastructure. Therefore, effects against DMC11 are likely to be positive overall.

In relation to both the draft IDAs and ASAs, it remains unknown the extent to which development brought forward in such locations would be an improvement to the built environment (DMC10), as this would be subject to implementation.

**SA Objective 6 - To reduce health inequalities and promote healthy lifestyles across the city**

A total of 21 IDAs are proposed within AQMAs or their cumulative air quality impact zones. As such, these sites are considered to have potential for minor negative effects for receptor health without appropriate mitigation (DMC12). It is acknowledged that development or redevelopment of such sites, including of other acceptable uses set out within Draft Policy E4, would be required to be delivered in line with Draft Policy HW2.

None of the ASAs are located within the AQMA or a cumulative impact zone, and as such, the exposure of receptors to air pollution is likely to be lower. Effects against DMC12 are assessed as unknown, being subject to the nature of development uses introduced within the area and any related mitigation.

Overall, the draft IDAs, MIWA and ASAs perform well across DMC14 as sites are proposed within locations that fulfil one or more of the sustainable transport criteria. Most sites are considered to have potential for significant positive effects, with the exception of three sites (IDA007; IDA014; and IDA022) which have potential for minor positive effects, due to being outside the distance threshold for an existing adopted Public Right of Way.

For some IDAs, there are opportunities to strengthen active transport routes to employment, which is supported by policy principles within emerging draft Transport policies.

**SA Objective 7 - Ensure access to education and learning for all sections of society – N/A**

**SA Objective 8 - To support the economy and ensure that there are suitable opportunities for employment**



All IDAs and ASAs are considered to generate positive effects for the city's economy through provision of floorspace for strategic and local businesses with industrial or distribution needs, with several smaller industrial IDA sites identified for small – medium sized industrial and distribution businesses (DMC17).

Draft Policy E4 does not specify the types of priority sectors which are desirable, or how sites align with these sectors. However, the NPPF (2023) continues to require that planning policies have regard to Local Industrial Strategies (LIS) in proactively encouraging sustainable economic growth. Priority sectors are identified within the LIS as: advanced engineering, including aerospace; creative, cultural and digital industries; and financial, business and legal 'tech' services. The effects of these sites against DMC18 and DMC20 are therefore likely to be positive, supported by draft Policy E4 which includes reference to some of these priority sectors (life sciences, last-mile logistics and creative and cultural industries) and how proposed allocations could support these.

IDAs are predominantly proposed within South and East Bristol. Development of such sites could support employment opportunities in areas of the city that continue to experience relatively higher rates of unemployment (based on IMD data for 2019) (DMC19). Retention of employment land within these areas could continue to support local economic growth and reduce inequalities across the city, particularly where local populations are able to access higher quality employment through sustainable transport modes. In addition, the proposed allocation of over 50% of the city-wide total IDA land within South Bristol aligns with the Local Plan's priority focus for the development and regeneration of this sub-area. In addition, ASAs are located within areas of high deprivation, and as such, it is considered that allocation for employment in these areas could boost local employment and wider regeneration.

It is unclear at this stage of the extent to which the IDAs and ASAs would support delivery of carbon neutral employment (DMC21); this is true particularly of zero carbon industry/distribution spaces, as this remains dependent upon elements such as the operational use alongside the as-built design of development. Overall effects of the IDAs and ASA against DMC21 are therefore unknown until implementation.

### **SA Objective 9 - Ensure access to a range of shopping facilities for all sections of society**

Only one IDA is located beyond 800m of a Town, District or Local Centre, and therefore would offer restricted accessibility to existing retail services. The potential sustainability effects are similar for ASAs whereby all sites in Avonmouth, except for ASA001, are located beyond the accepted 800m walking distance of Avonmouth Local Centre. However, the potential negative effects of the siting of industrial and distribution development could be mitigated by provision of on-site retail or amenity facilities for employees, as set out within Draft Policy E4.

### **SA Objective 10 - To ensure the protection and enhancement of the historic environment and its setting**

A limited number of IDAs are considered to have potential for negative, unknown sustainability effects for the historic environment (DMC24) where they are located within or on the boundary of a Conservation Area (IDA001, IDA006, IDA008, IDA010, IDA018, IDA019, IDA024, IDA025, IDA028). While the potential impact of site development upon the affected Conservation Areas is not possible

to determine at this stage, the requirement for proposals to be compliant with other Local Plan policies that address the historic environment (including Draft Policy CHE1) would ensure the appropriate safeguarding of Conservation Areas and is therefore sufficient mitigation for IDAs.

For ASAs, the majority of these sites do not include any designated heritage assets and as such, sustainability effects against DMC24 are generally considered to be neutral. However, a small proportion of Land at Kings Weston Lane (ASA002) overlaps the Scheduled Monument ('The Mere Bank and Flanking Ditches'), and therefore, there is potential for development to have negative effects upon this designated heritage asset of the highest significance. Effects are also unknown at this stage: subject to the nature of development, its siting and any proposed mitigation.

For MIWAs, although Draft Policy E4 requires development to protect or enhance the maritime function of the area, these two sites overlap with several designated heritage assets, including in the case of Underfall Yard (MIWA001), a Scheduled Ancient Monument. The draft policy should set out appropriate mitigation measures to conserve and enhance the significance of these assets.

**SA Objective 11 - To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats**

In terms of national and international designations, none of the IDAs, MIWAs or ASAs overlap with an of the statutory habitats sites (including RAMSAR, SPA or SAC), Sites of Special Scientific Interest (SSSI), or National Nature Reserves (NNR). Several of the ASAs are less than 800m from these ecological designations, as are MIWA001, IDA002 and IDA004. All sites are within an SSSI impact zone, and therefore overall effects are often uncertain at this stage. No sites intersect with Ancient Woodland.

In terms of local designations, several employment allocations include a partial overlap, or are directly adjacent to, a Site of Nature Conservation Interest (SNCI), one IDA partially overlaps with a Local Nature Reserve (IDA028) and a MIWA (MIWA001) is within 20m of the River Avon Local Nature Reserve. None of the employment allocations overlap with Regionally Important Geological Sites (RIGS).

A total of 17 sites are adjacent to or on the boundary of a SNCI, including the River Avon SNCI and Easton-Staple Hill Disused Railway SNCI. Further development or redevelopment of IDAs in these locations could therefore introduce cumulative negative effects for existing ecology and habitat areas in the absence of appropriate mitigation. For sites with partial or full overlap between ecological or geological sites, policy requirements could reference mitigation and/or requirement for enhancement of such areas.

Several of the ASAs overlap with the Wetland Strategic Network, identified within the West of England Partnership Nature Recovery Network. ASA001 and ASA003 include small areas of SNCIs, whilst the ASA002 allocation is also adjacent to an SNCI. Land at Chittening Road (ASA004) is also adjacent (within 10m) of the Hallen Marsh mitigation area. Site ASA005 is within an SSSI Impact zone, which requires consultation with relevant statutory nature conservation bodies for all planning applications.

**SA Objective 12 - To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation**

Several of the IDAs, MIWAs and ASAs are located directly adjacent to either a Nature Recovery Network opportunity area and/or a SNCI; and two ASAs similarly include small areas designated as a SNCI. Some of these are also located adjacent to a greenway, allotments or areas of flood risk. These sites are reasonably well dispersed across the City.

It is considered that there could be opportunities through development or redevelopment proposals for off-site enhancement and/or provision of on-site green or blue infrastructure, and that this could be delivered to be both integrated and multi-functional in nature, thereby bringing benefits for flood resilience, biodiversity and climate change.

**SA Objective 13 - To encourage a demonstrable modal shift and reduce the need to travel**

Overall, the majority of draft IDAs are considered to have potential to generate positive or significant positive effects for DMC14, which addresses access to and quality of sustainable transport modes (walking, cycling and public transport). Assessment accounts for accessibility to bus stops, railway stations, PRowWs and cycleways.

ASAs were considered to have neutral effects for DMC14. The majority of ASAs also have limited access via PRowWs or cycleways, and as such, do not have good levels of pedestrian access or cycling infrastructure. Access to public transport into the Avonmouth and Severnside area is relatively poor and as the majority of sites exist beyond the defined distances for public transport; this issue was noted within the ELSNA (2021) and means that opportunities to reduce the need to travel by private car are not maximised. Appropriate policy mitigation should be considered in relation to the ASAs specifically in this regard.

While the appraisal is primarily concerned with existing infrastructure within the distances defined in the SA Framework for site assessment, proposed strategic cycleways ('aspirational' routes) were identified as part of this process, and it is noted that the delivery of these may improve future accessibility of some IDAs or ASAs.

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 illustrative, it is not possible at this stage to set out exactly which sites will be affected and therefore effects of site allocations for DMC29 are unknown with potential for significant effects (++ /?).

**SA Objective 14 - To maintain and improve the existing highway network**

All new development, unless required to be car-free, has the potential to increase the number of vehicle journeys and therefore contribute to congestion issues in the city. Therefore, proposals could score negatively against DMC30 with an unknown effect dependent upon the scale of development (-/?).

Policies for Transport Development Management and Parking Standards, alongside emerging Local Plan policies (Policy T4A) to limit parking and increase cycling provision, will likely result in an overall

positive effect on levels of vehicular movements associated with new development and therefore effects for DMC31 are minor positive, however unknown dependent on the design of proposals coming forward on allocated sites (+/?).

### **SA Objective 15 - To reduce the risk of flooding from all sources**

Several IDAs and MIWAs have minor areas within Flood Risk Zone 3b (; IDA002; IDA003; IDA012; IDA017; IDA019; IDA021; IDA023; IDA024; IDA025; IDA028; IDA030; IDA032; MIWA001 and MIWA002). Whilst 'less vulnerable' development is proposed on these sites, the Flood Risk Vulnerability Classification considers that this type of development should not be permitted in areas of Flood Risk Zone 3b. Several of the IDAs intersect with Proposed Flood Defence Policy areas (IDA012; IDA019; IDA024; IDA025 and IDA032), and therefore effects are significant negative, however also unknown, with proposed flood infrastructure as mitigation (-- /?).

In relation to the ASAs, sites are located within Flood Risk Zone 3a or Flood Risk Zone 2 with variable surface flood water risk levels. Depending on the vulnerability of uses proposed on site (i.e., energy generation uses are considered to be 'essential infrastructure' and therefore require an exception test, whereas industrial and distribution uses are considered to be 'less vulnerable') effects are also uncertain. Proposed allocations at Avonmouth will require update following implementation of the Avonmouth Severnside Enterprise Area flood mitigation and habitat creation scheme.

In addition, several IDAs and MIWAs include areas of high or medium surface water flood risk and therefore development proposals at the site will be required to be in conformity with Policy FR1.

The corresponding mitigation requirements for draft IDAs and Avonmouth employment allocations will be as set out within emerging draft policies, where proposals are to be supported by a site-specific flood risk assessment and a drainage strategy, which will be expected to prioritise sustainable drainage systems, ensure no increased flood risk and provide appropriate mitigation. Retained Local Plan policies would continue to ensure that flood risk and water management is accounted for within new development.

### **SA Objective 16 - Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled**

All draft IDA, MIWAs and ASAs are considered to be neutral in their sustainability effects for several decision-making criteria under SA Objective 16 (DMC34 and DMC36), as the extent to which development would minimise resource use and waste production, while increasing energy efficiency, is dependent upon implementation. In addition, as there are no groundwater protection zones identified within the Plan area based upon latest available Defra mapping<sup>5</sup>, effects are appraised as neutral (DMC36)

Site allocations have potential to impact directly on the water quality baseline; and could create negative and cumulative impacts for water quality, subject to the type of development proposed

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<sup>5</sup><https://environment.data.gov.uk/DefraDataDownload/?mapService=EA/SourceProtectionZonesMerged&Mode=spatial>

and any on/off site mitigation. Retained Local Plan policies would ensure that flood risk and water management is accounted for within new development.

There are no groundwater Source Protection Zones (SPZs) or Nitrate Vulnerable Zones (NVZs) (DMC35) identified within the Plan area, based upon latest available Defra mapping<sup>6</sup>, and therefore sites are not subject to additional regulations associated with groundwater/aquifer sources.

In relation to DMC37, all sites score neutrally given there are no impacts on designated allotment land. Land east of Packgate Road, Ashton Vale Road, South Liberty Lane and Land South of Seabank Power Station have a small overlap with areas of Agricultural Land Classification Grade 3. This is poorer quality agricultural land and therefore effects are appraised as neutral.

### **SA Objective 17 - Minimise air and noise pollution**

A significant proportion of IDAs are proposed within AQMAs or their cumulative air quality impact zones. As such, these sites are considered to have potential for minor negative effects for SA Objective 17 in relation to minimising exposure to pollution (DMC38), without either appropriate mitigation. For IDAs located in AQMAs or cumulative air quality impact zones, development or redevelopment of industrial use premises, or other uses deemed acceptable by Draft Policy E4, would be required to be delivered with appropriate mitigation in line with Draft Policy HW2. All Avonmouth employment allocations are located outside of AQMAs or cumulative air quality impact zones, and as such, effects against DMC38 are considered to be unknown, being dependent upon other interacting factors such as the type for future development proposed within these allocations and any adjacent sites (e.g. PIWA).

### **SA Objective 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**

All draft IDAs and Avonmouth employment allocations are considered to be unknown in their sustainability effects for several decision-making criteria under SA Objective 18 (DMC39, DMC40 and DMC42), because the extent to which development would reach energy efficiency targets, climate resilient design and/or use of renewable energy is dependent upon final constructed design / operation, directed by other Local Plan policies. Under DMC41, several IDAs are likely to generate minor positive effects as they are located in a District Heat Network Areas, which means that such sites are able to access low-carbon heat energy sources for any future development. None of the Avonmouth employment allocations are located within an existing Heat Priority Network Area, and as such, sustainability effects are considered to be unknown for DMC41.

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<sup>6</sup><https://environment.data.gov.uk/DefraDataDownload/?mapService=EA/SourceProtectionZonesMerged&Mode=spatial>

3.2 Assessment of Industry and Distribution Area (IDAs) Allocations, Maritime Industrial Area Allocations (MIWAs) and Avonmouth Employment Allocations (ASAs)

Site Ref	Site Name	1		2			3	4	5		6		7	8				9	10	11	12	13		14		15		16				17	18										
		DMC 1	DMC 2	DMC 3	DMC 4	DMC 5	DMC 6	DMC 7	DMC 8	DMC 9	DMC 10	DMC 11	DMC 12	DMC 13	DMC 14	DMC 15	DMC 16	DMC 17	DMC 18	DMC 19	DMC 20	DMC 21	DMC 22	DMC 23	DMC 24	DMC 25	DMC 26	DMC 27	DMC 28	DMC 29	DMC 30	DMC 31	DMC 32	DMC 33	DMC 34	DMC 35	DMC 36	DMC 37	DMC 38	DMC 39	DMC 40	DMC 41	DMC 42
IDA001	Ashley Hill, St. Werburgh's					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	-/?	?	?	+/?	++	++/?	-/?	+/?	+	?	0	0	0	0	-	?	?	?	?
IDA002	Ashton Vale Road, Ashton					++	+	0			+	+	-		++			++	+/?	++	+/?	?		+	0	?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	?	?
IDA003	Barton Hill Trading Estate, Barton Hill					++	++/?	0			+	+	-		++			++	+/?	++	+/?	?		+	0	-/?	?	+/?	++	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	?	?
IDA004	Brislington Trading Estate / Bath Road (north)					++	+	0			+	+	-		++			++	+/?	++	+/?	?		+	0	-/?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	?	?
IDA005	Bush Industrial Estate, Whitehall					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	?	?
IDA006	Cater Road, Bishopsworth / Hartcliffe					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	-/?	-/?	?	+/?	+	++/?	-/?	+/?	+	?	0	0	0	0	0	?	?	?	?
IDA007	Central Park, Petherton Road, Hengrove					++	+	0			0	0	0		+			+	+/?	+	+/?	?		+	0	?	?	?	0	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA008	City Business Park, Easton					++	+	0			+	+	-		++			++	+/?	++	+/?	?		+	-/?	?	?	?	++	++/?	-/?	+/?	+	?	0	0	0	0	-	?	?	+	?
IDA009	East of Kingsland Road, St. Philip's					++	++/?	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	+	?
IDA010	East of Midland Road, Old Market					++	++/?	0			0	0	-		++			+	+/?	+	+/?	?		+	-/?	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	+	?
IDA011	Eastpark Trading Estate, Whitehall					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	0	-/?	?	+/?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA012	Feeder Road, St. Philip's Marsh					++	++/?	0			+	+	-		++			++	+/?	++	+/?	?		+	0	-/?	?	+/?	++	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	?	?
IDA013	Fishponds Trading Estate, Eastville					++	+	0			+	+	0		++			++	+/?	++	+/?	?		+	0	-/?	?	+/?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA014	Hawkfield Business Park, Hartcliffe					++	+	0			+	+	0		+			++	+/?	++	+/?	?		0	0	?	?	+/?	0	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA015	Liberty Industrial Park, Ashton Vale					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	0	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA016	Lodge Causeway (west), Fishponds					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	0	-/?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA017	Malago Vale Estate, Windmill Hill					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	+/?	++	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	?	?
IDA018	Montpelier Central / Station Road, Montpelier					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	-/?	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	?	?
IDA019	Netham Road / Blackswarth Road (south), St. George					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	-/?	?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	0	?	?	?	?
IDA020	New Gatton Road, St. Werburgh's					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	?	?
IDA021	Nover's Hill / Hartcliffe Way, Knowle					++	+	0			+	+	0		++			++	+/?	++	+/?	?		+	0	-/?	?	+/?	++	++/?	-/?	+/?	--/?	?	0	0	0	0	0	?	?	?	?
IDA022	Roman Farm Road, Hengrove					++	+	0			+	+	0		+			++	+/?	++	+/?	?		+	0	?	?	?	0	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA023	South Liberty Lane / Brook Gate, Ashton Vale					++	+	0			+	+	0		++			++	+/?	++	+/?	?		+	0	-/?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	0	?	?	?	?
IDA024	St Anne's Road (north), St. Anne's					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	-/?	-/?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	0	?	?	?	?
IDA025	St Anne's Road (south), St. Anne's					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	-/?	-/?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	0	?	?	?	?
IDA026	St Gabriel's Business Park / Easton Business Centre, Easton					++	+	0			+	+	-		++			++	+/?	++	+/?	?		+	0	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	+	?
IDA028	Vale Lane / Hartcliffe Way, Bedminster Down					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	-/?	-/?	?	+/?	++	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	?	?
IDA029	Western Drive, Hengrove					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA030	Whitby Road (north), St. Anne's					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	0	-/?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	0	?	?	?	?
IDA031	Whitby Road (south), Brislington					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	?	?

Site Ref	Site Name	1				2			3	4	5		6			7		8					9		10	11		12	13		14		15		16				17	18			
		DMC 1	DMC 2	DMC 3	DMC 4	DMC 5	DMC 6	DMC 7	DMC 8	DMC 9	DMC 10	DMC 11	DMC 12	DMC 13	DMC 14	DMC 15	DMC 16	DMC 17	DMC 18	DMC 19	DMC 20	DMC 21	DMC 22	DMC 23	DMC 24	DMC 25	DMC 26	DMC 27	DMC 28	DMC 29	DMC 30	DMC 31	DMC 32	DMC 33	DMC 34	DMC 35	DMC 36	DMC 37	DMC 38	DMC 39	DMC 40	DMC 41	DMC 42
IDA032	Whitby Road (west), Brislington					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	-/?	?	+/?	0	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	?	?
IDA033	Whitehall Trading Estate, Whitehall					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	?	?
IDA034	Winterstoke Road / South Liberty Lane, Ashton Vale					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	?	++	++/?	-/?	+/?	++	?	0	0	0	0	-	?	?	?	?
IDA035	Woodland Way, Hillfields					++	+	0			+	+	0		++			++	+/?	++	+/?	?		+	0	?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA036	New Station Way					++	+	0			0	0	0		++			+	+/?	+	+/?	?		+	0	-/?	?	?	+	++/?	-/?	+/?	++	?	0	0	0	0	0	?	?	?	?
IDA036A	Glenfrome Road (south)					++	+	0			0	0	-		++			+	+/?	+	+/?	?		+	0	?	?	?	++	++/?	-/?	+/?	+	?	0	0	0	0	-	?	?	?	?
MIWA001	Underfall Yard					++	++/?	0			0	0	-		++			+	+/?	+	+/?	?		+	--/?	?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	+	?
MIWA002	Albion Dock/Bristol Marina					++	++/?	0			0	0	-		++			+	+/?	+	+/?	?		+	-/?	?	?	+/?	+	++/?	-/?	+/?	--/?	?	0	0	0	0	-	?	?	+	?
ASA001	Land at King Weston Lane (St Modwen south)					--	0/?	-			+	+	0		++			++	+/?	++	+/?	?		0	0	-/?	?	?	0	++/?	-/?	+/?	+	?	0	0	0	0	0	?	?	?	?
ASA002	Land at King Weston Lane (St Modwen north)					--	0/?	-			+	+	0		++			++	+/?	++	+/?	?		0	--/?	?	?	?	0	++/?	-/?	+/?	+	?	0	0	0	0	0	?	?	?	?
ASA003	Land east of Packgate Road (Site A12)					--	0/?	-			+	+	0		++			++	+/?	++	+/?	?		0	0	-/?	?	+/?	0	++/?	-/?	+/?	+	?	0	0	0	0	0	?	?	?	?
ASA004	Land east of Chittening Road					--	0/?	-			+	+	0		++			++	+/?	++	+/?	?		0	0	?	?	+/?	0	++/?	-/?	+/?	+	?	0	0	0	0	0	?	?	?	?
ASA005	Land South of Sea Bank Power Station(Site A01)					--	0/?	-			+	+	0		++			++	+/?	++	+/?	?		0	0	?	?	+/?	0	++/?	-/?	+/?	+	?	0	0	0	0	0	?	?	?	?

## 4. Site allocation alternatives

The final section of this appendix collates prospective 'reasonable alternative' sites for review. These include:

- Proposed draft site allocations discounted from the Local Plan since the Draft Local Plan March 2019 Consultation version;
- Existing adopted site allocations no longer progressed; and,
- Some Call for Sites, not supported for allocation, which would otherwise not have a supportive policy context.

### 4.1 Sites discounted since the Draft Local Plan March 2019 Consultation

#### DS11B Land at Yew Tree Farm, Bridgwater Road

In relation to Objective 1, DS11B demonstrates uncertain effects in the extent to which the site would contribute to meeting the needs of communities, on the basis that capacity would be subject to masterplanning. It is unclear at this stage whether DS11B would support providing an appropriate mix of types of housing to meet the needs of all communities, as there is no specified requirement for self-build and custom housebuilding and/or community-led housebuilding nor alternative methods of delivery.

In relation to Objective 2, similar to the draft Green Belt site allocations, the site would generate significant negative effects as it would not promote the conservation of land and maximise the re-use of previously developed land. In addition, as the site is not within accepted walking distances to a range of facilities, it would also generate negative effects against Objective 3.

Effects in relation to Objective 6 DMC13 and DMC14 are considered to be significant positive, as the site would be within 400m walk of a proposed Local Green Space designation ('Bedminster Down Common') and the site could support walking and cycling as attractive modes of transport. The site is however located beyond accepted travel distances for primary schools, although it is within accepted distances for secondary schools (DMC16).

Effects in relation to Objective 4, Objective 12, Objective 16 and Objective 17 are considered to be uncertain. Effects against: Objective 5, in relation to ability to improve the quality of life for those living in areas of concentrated disadvantage; Objective 6, in relation to contribution to air quality, and Objective 9, are considered to be neutral. The site is predominantly identified as Grade 3, Grade 4 and Urban Agricultural Land Classifications, and therefore the effect against Objective 16 is considered to be neutral.

The site is directly abutting a Registered Park and Garden, and therefore without associated development considerations to conserve and enhance this designated heritage asset, the overall effect against Objective 10 is likely to be minor negative but uncertain. Similarly, the site is adjacent to the Colliter's Brook SNCI, which is located to north, and could also generate an uncertain minor negative effect against Objective 11.



Effects in relation to Objective 13, in encouraging a demonstrable modal shift and reducing the need to travel, are minor positive as the site is within accepted walking thresholds of a PRoW, cycling network and bus stop. In relation to Objective 15, this site performs significantly positively on the basis that it is within Flood Risk Zone 1 with only relatively limited (>10%) areas subject to surface water flooding.

#### **Earlier proposed draft site allocations**

A number of sites from the Local Plan in March 2019 have not been included on the basis that development is either complete or committed via progression of a planning application, or the allocation is not required.

#### **Existing adopted allocations no longer progressed**

Site allocations are not included where they progressed to permission/implementation stage.

4.2 Assessment of Potential Reasonable Alternatives

Table 4 Assessment of Potential Reasonable Alternatives

		SA Objectives																																									
		1		2		3	4	5		6		7	8			9		10	11		12	13		14		15		16			17	18											
Site ref	Site Address	DMC1	DMC2	DMC3	DMC4	DMC5	DMC6	DMC7	DMC8	DMC9	DMC10	DMC11	DMC12	DMC13	DMC14	DMC15	DMC16	DMC17	DMC18	DMC19	DMC20	DMC21	DMC22	DMC23	DMC24	DMC25	DMC26	DMC27	DMC28	DMC29	DMC30	DMC31	DMC32	DMC33	DMC34	DMC35	DMC36	DMC37	DMC38	DMC39	DMC40	DMC41	DMC42
DS11B	Land at Yew Tree Farm, Bridgwater Road	?	?	0	0	--	0	--	-	?	0	0	0	++	++	+/?	-						0	0	-/?	-/?	?	?	+	++/?	-/?	?	++	?	0	0	0	0	0	?	?	?	?