



Bristol Local Plan

Sustainability Appraisal of the Bristol Local Plan Pre-Submission Publication Version (2023)



Contents

| | | |
|-------|---|----|
| 1. | Introduction | 4 |
| 1.1 | Overarching role of the Sustainability Appraisal and the Bristol Local Plan | 4 |
| 1.2 | The Progression of the Bristol Local Plan and Sustainability Appraisal | 5 |
| 2 | Context: Statutory and policy framework for the Pre-Submission Version Sustainability Appraisal | 7 |
| 2.1 | Overview | 7 |
| 2.2 | Statutory Framework | 7 |
| 2.3 | National Planning Policy and Guidance | 9 |
| 2.4 | Emerging Changes in relation to the SEA regime | 12 |
| 2.5 | Structure of the Sustainability Appraisal | 13 |
| 3. | Scoping Report and Update, the 'current situation' and implications for the Sustainability Appraisal Framework (Stages A1 – A4) | 15 |
| 3.1 | Overview of Baseline 'Current Situation' and Rationale for Update | 15 |
| 3.2 | Identifying plans, policies and programmes, collecting baseline information and identifying sustainability issues (Stage A1 – A3 Review) | 15 |
| 3.3 | Overarching challenges encountered in compiling the SA Framework and Baseline Update, and the need for future updates | 16 |
| 3.4 | Developing the Sustainability Appraisal Framework Update (Stage A4 Review) | 20 |
| 3.5 | Adding definition to the SA Framework (Stage A4 Review) | 28 |
| 3.6 | Summarising the 'Current Situation' | 29 |
| 3.7 | Summary of SA Framework and Baseline Update | 32 |
| 4. | Testing the Local Plan Publication Version Objectives against the Sustainability Appraisal Framework (Stage B1) | 33 |
| 4.1 | Overview | 33 |
| 4.2 | Establishing the approach to testing Local Plan Publication Version Objectives | 33 |
| 4.3 | Comments and recommendations for potential incompatibilities between Bristol Local Plan Pre-Submission Publication Version (November 2023) aims and objectives, and SA Objectives | 37 |
| 5. | Developing the Local Plan Options including the Strategic Reasonable Alternatives (Stage B2) | 38 |
| 5.1 | Developing Strategic Options for the Local Plan Strategy | 40 |
| 5.1.1 | Strategic Options: Reasonable Alternatives for Housing Need | 41 |
| 5.1.2 | Strategic Options: Reasonable Alternatives for Housing Distribution | 53 |
| 5.1.3 | Strategic Options: Reasonable Alternatives for Employment Growth and Distribution | 62 |

| | | |
|-----|--|-----|
| 5.2 | Reasonable Alternatives for the Pre-Submission Publication Version Policies | 74 |
| 5.3 | Reasonable Alternatives for Site Allocations | 75 |
| 6. | Predicting and evaluating the effects of the Local Plan policy options and site allocations (Stage B3) | 76 |
| 6.1 | Overview | 76 |
| 6.2 | Method and assumptions for predicting and evaluating the effects of the Pre-Submission Publication Version | 76 |
| 6.3 | Predicting the effects of the Bristol Local Plan Pre-Submission Publication Version (2023)... | 78 |
| 6.4 | Evaluating the overall effects of the Local Plan | 88 |
| 7. | Methods for mitigating adverse effects and maximising beneficial effects (Stage B4) | 95 |
| 7.1 | Overview | 95 |
| 7.2 | Mitigation for Draft Local Plan Policies | 95 |
| 7.3 | Mitigation for Draft Local Plan Site Allocations | 98 |
| 8. | Measures to monitor the significant effects of implementing the Local Plan (Stage B5) | 100 |
| 8.1 | Overview | 100 |
| 8.2 | Monitoring Framework | 100 |

1. Introduction

1.1 Overarching role of the Sustainability Appraisal and the Bristol Local Plan

The current Bristol Local Plan consists of a set of three documents covering the period until 2026, including: the Core Strategy (2011); the Site Allocations and Development Management Policies Development Plan Document (2014); and the Bristol Central Area Plan (2015). Alongside the Joint Waste Core Strategy from March 2011 and Neighbourhood Plans within Bristol, this forms the statutory development plan. In combination with the National Planning Policy Framework (NPPF), the development plan helps direct decisions on planning applications and growth in Bristol.

The Core Strategy established the need for a five-year cycle of monitoring and review with an interim review date of 2016 and a major review date of 2021. Preparation of the emerging draft Local Plan Review therefore began in 2018; at this point, Bristol City Council (BCC), South Gloucestershire Council (SGC), Bath & North East Somerset Council (B&NES) and North Somerset Council (NSC) had been working together to prepare the West of England Joint Spatial Plan (JSP). In 2020, however, the JSP was withdrawn and the strategic planning context for the Bristol Local Plan was due to be set out instead within the West of England Combined Authority Spatial Development Strategy (SDS), prepared between BCC, SGC and B&NES. As of 2022, work on the SDS is not now being progressed and so the strategic planning context for Bristol's Local Plan is established as a standalone development plan document through a process of cooperation with our neighbouring councils.

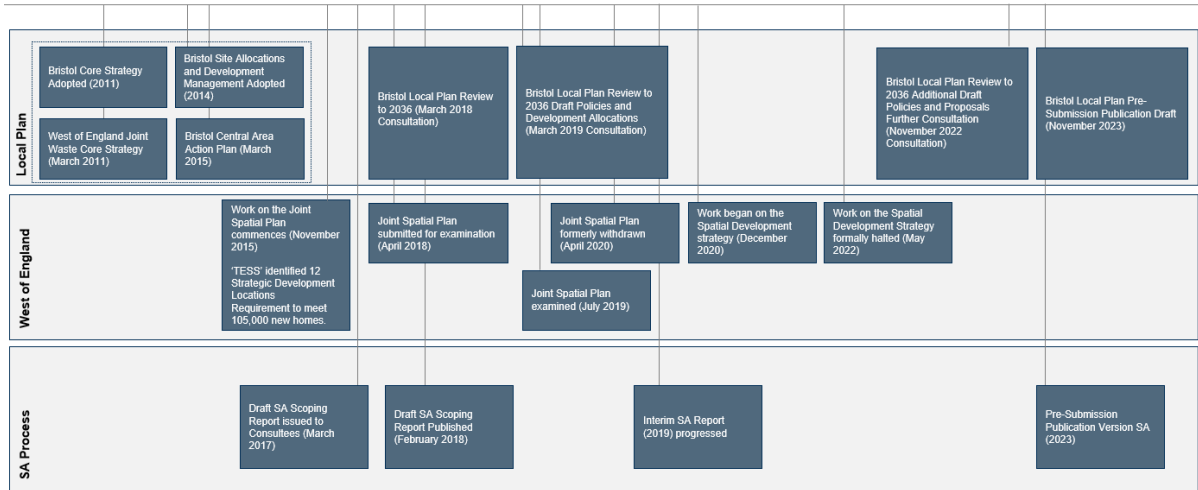
An updated planning policy framework is therefore needed to guide development up to 2040. When the Review started it was expected that many existing policies would be carried forward from the current Local Plan where they remained up-to-date and relevant. However, with the passage of time and changing strategic context it is now necessary to rewrite the whole Local Plan.

The new Bristol Local Plan will therefore comprise a single document. It should be noted that some policies look very similar to those in the existing Local Plan where these continue to be consistent with national planning policy and support the overall aims and objectives.

1.2 The Progression of the Bristol Local Plan and Sustainability Appraisal (SA)

The Bristol Local Plan has developed over a series of stages.

Figure 1 Progress of Bristol Local Plan



Consultation on the new Bristol Local Plan Review commenced in February 2018. At this point, new policies related to the delivery of new homes through urban living, aiming to exceed the housing target, ensuring employment land and premises are available in the right places, providing new protection for open spaces, and, updating current climate change and sustainability policies. At this point, a series of existing adopted policies were to be retained.

In March 2019, a second round of Regulation 18 Stage consultation¹ was undertaken by BCC on the 'Bristol Local Plan Review: Draft Policies and Development Allocations' document, which sought feedback on 70 draft development site allocations and over 50 draft policies. At this point, the JSP set out the overall strategy for how housing needs in the wider Bristol and Bath area would be met over the period to 2036. Policies in the current Local Plan which were consistent with the JSP and Local Plan Review, were proposed to be retained.

The intention was that responses to the March 2019 Consultation Draft would shape a formal Regulation 19 Consultation Draft. However, changes in the approach to planning at a regional level, national policy changes and the need to give even greater priority to climate and ecological emergencies resulted in further changes to proposals in November 2022. The Further Consultation (November 2022) was published by BCC which covered an additional 22 policies and changes to a series of development locations and allocations. It acknowledged that the Spatial Development Strategy was no longer being progressed, and so the strategic planning context for Bristol's Local Plan was to be established through a process of cooperation with neighbouring councils.

The Bristol Local Plan Pre-Submission Publication Version (2023) therefore represents a culmination of previous Regulation 18 Consultation versions and contains a series of new policies and proposals. It covers the: development strategy; infrastructure and social value; urban living; housing and economy; shopping and local centres; green infrastructure and biodiversity; transport; community

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012

facilities; net zero and climate change; design; health and wellbeing and utilities and minerals. It also contains the full suite of development allocations proposed through previous consultations.

The Sustainability Appraisal (SA) process began with the preparation of Scoping Report in 2018². The Scoping Report identified relevant plans, programmes and sustainability objectives, detailed baseline information and identified sustainability issues and problems. The Scoping Report also set out the SA Framework, which formed the overarching guiding framework for appraising elements of the plan against.

To align with the progression of the March 2019 Consultation Draft Local Plan, an Interim Sustainability Appraisal ('Interim SA Report (2019)') was prepared. The Interim SA Report (2019) provided to Council Officers an initial assessment of the extent to which proposed policies in the Bristol Local Plan Review: Draft Policies and Development Allocations (March 2019) Consultation Draft, when judged against reasonable alternatives, would help achieve relevant environmental, economic and social sustainability objectives or have environmental effects. The outcomes of the Interim SA have informed policies within the Publication Version November 2023 Draft Local Plan.

This report represents the SA for the Pre-Submission Publication Version November 2023 Draft Local Plan.

² <https://www.bristol.gov.uk/documents/20182/34536/Sustainability+Appraisal+Report+2018/880c325a-b039-4985-acb9-5c6870603dc2>

2 Context: Statutory and policy framework for the Pre-Submission Version Sustainability Appraisal

2.1 Overview

At the time of preparation of the Scoping Report 2018 and the Interim SA Report (2019), there was a requirement to comply with the SEA Environment Assessment of Plans and Programmes Directive (Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment) (hereafter '**the SEA Directive**'). This is in addition to the Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter, '**the SEA Regulations**'), which represents the transposition of the SEA Directive into UK law.

In response to Britain leaving the EU in January 2020, the **UK-EU Trade and Cooperation Agreement** was prepared and agreed between parties in December 2020, and came into force on 1st January 2021. In relation to SEA, Article 7.2 states each party can set its own policies and priorities, however these must result in 'non-regression' from levels of protection, and these must be consistent with international commitments. The Government remains subject to wider international duties, for instance the European Convention on Human Rights, the Aarhus Convention, the Paris Agreement (climate), the Espoo Convention (environmental assessment) and the Ramsar Convention (habitats). Therefore, for the purposes of this SA and in the absence of transposition of the UK-EU Trade Agreement in SEA legislation at the time of drafting, this has been prepared in accordance with the SEA Regulations of 2004.

2.2 Statutory Framework

SEA Directive

Article 1 states that the overarching objective of the SEA Directive³ is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans, with a view to promoting sustainable development. An environmental assessment is carried out where a plan or programme is considered likely to have significant effects on the environment.

Articles 3 and 4 require that the environment assessment is carried out during the preparation of a plan, and before its submission or adoption to the legislative procedure. Article 4 further states that where plans form part of a hierarchy, duplication should be avoided, and account should be made of the assessment carried out elsewhere at different levels of the hierarchy.

Article 5 states that where an environmental assessment is required, this:

1. *'shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I'.*
2. *'shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or*

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN>

programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment’.

Annex 1 sets out information referred to in Article 5(1). Requirements include baselining of the environmental characteristics of the areas likely to be significantly affected, existing environmental issues, the consideration of likely significant effects on defined issues, an outline of the reasons for selecting the alternatives and measures for monitoring.

Finally, Article 6 sets out the requirements for consultation with the public (1) and those authorities with specific environmental responsibilities (2). This requires the public to be given early and effective opportunity to express their opinion on the draft plan or programme and the accompanying environment report.

Article 10 requires the monitoring of significant environment effects of the implementation of plans and programmes in order to identify at an early-stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.

SEA Regulations⁴

The SEA Regulations transpose the SEA Directive into UK Law and do not add any further requirements. Annex I of the Directive is repeated at Schedule 2 (‘Information for Environmental Reports’) within the SEA Regulations. In preparing the environmental report, Regulation 12 (Part 3) states that the information referred to in Schedule 2 should take account of:

- (a) current knowledge and methods of assessment;*
- (b) the contents and level of detail in the plan or programme;*
- (c) the stage of the plan or programme in the decision-making process; and*
- (d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.*

Regulation 4d (Part 1) defines the consultation bodies in relation to the plan or programme as the Environment Agency, Natural England, and Historic England.

The section of this SA Report for Bristol Local Plan Pre-Submission Publication Version (2023) that corresponds with the SEA Directive and Regulations is set out within Table 1.

Planning and Compulsory Purchase Act 2004

There is a mandatory requirement under the Planning and Compulsory Purchase Act 2004 to undertake a Sustainability Appraisal of Local Plan documents and programmes⁵. This states that the Local Planning Authority must:

- (a) carry out an appraisal of the sustainability of the proposals in each development plan document;*

⁴ <http://www.legislation.gov.uk/uksi/2004/1633/made/data.pdf>

⁵ Part 2, Section 19, Planning and Compulsory Purchase Act 2004 (c. 5)

(b) prepare a report of the findings of the appraisal.

More generally, section 39 of the Act requires that the authority preparing a plan must do so ‘*with the objective of contributing to the achievement of sustainable development*’.

2.3 National Planning Policy and Guidance

The national policy context for the preparation of Sustainability Appraisals is established within the National Planning Policy Framework and associated Planning Practice Guidance; and although aged, the EC Guidance on the Implementation of Directive 2001/42 and the Practical Guide to the SEA Directive.

National Planning Policy Framework (NPPF) requires all local plans and spatial development strategies to be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements⁶.

Paragraph 31 requires that: ‘*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals*’.

Paragraph 32 requires that ‘*Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirement*’. *This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)*’.

Planning Practice Guidance (PPG): provides clarity on the need for sustainability appraisal and strategic environmental assessment in relation to plan development. The sustainability appraisal is considered to be a product of a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)⁸.

⁶ National Planning Policy Framework (2023) Paragraph 32

⁷ The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects.

⁸ Planning Practice Guidance (2019) Paragraph: 001 Reference ID: 11-001-20190722

A Local Plan that is likely to have a significant effect on a habitats site will also require an 'Appropriate Assessment', as set out in the Conservation of Habitats and Species Regulations 2017 (as amended)⁹. The SA should take account of the findings of the Habitat Regulations Assessment¹⁰.

The SA should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It 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 Plan¹¹.

Paragraph 13 of the PPG sets out the key stages of Local Plan preparation and their relationship with the sustainability appraisal process. Stage B¹², was undertaken alongside Regulation 18 consultation periods on the Local Plan in the form of the 'Interim SA' and consists of the following:

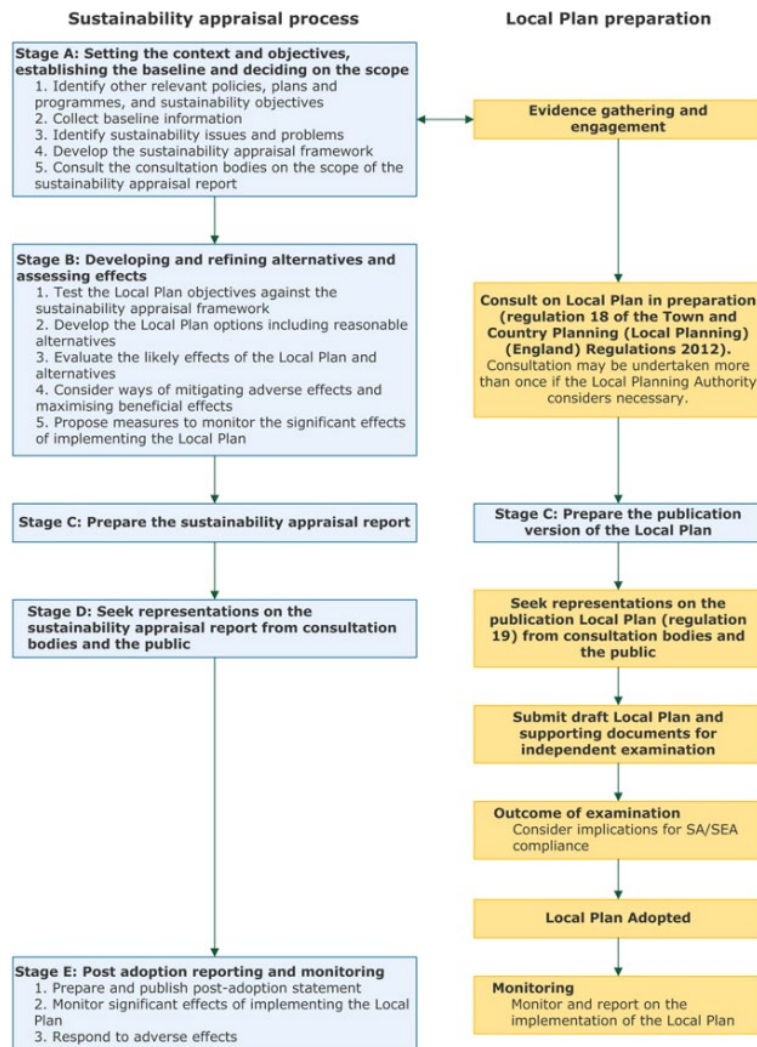
- Test the Local Plan objectives against the sustainability appraisal framework;
- Develop the Local Plan options including reasonable alternatives;
- Evaluate the likely effects of the Local Plan and alternatives;
- Consider ways of mitigating adverse effects and maximising beneficial effects; and,
- Proposed measures to monitor the significant effects of implementing the Local Plan.

Following the development and refinement of alternatives, Stage C requires the preparation of the SA Report. At Regulation 19 Consultation, Stage D requires the seeking of representations on the sustainability report from consultation bodies and the public. This SA Report therefore represents Stage D.

In accordance with the PPG, the key stages of Local Plan preparation and their relationship with the SA process are set out within the Figure 2 below, and the corresponding section of the Interim Report is set out Table 1.

9 Planning Practice Guidance (2019) Paragraph: 003 Reference ID: 11-003-20190722
10 Planning Practice Guidance (2014) Paragraph: 011 Reference ID: 11-011-20140306
11 Planning Practice Guidance (2014) Paragraph: 009 Reference ID: 11-009-20140306
12 Planning Practice Guidance (2014) Paragraph: 013 Reference ID: 11-013-20140306

Figure 2 Sustainability Appraisal Process



Tasks A1- A5 were undertaken as part of the Scoping Report from 2018, which formed part of the March 2019 Consultation and was itself subject to consultation with statutory bodies in April 2017. For reasons set out within the ‘*Overarching challenges encountered in compiling the SA and the need for future updates to baseline*’ section of the report’ (see Section 3), the Scoping Report was updated in 2023 to reflect changes to baseline information, other relevant plans, programmes and sustainability issues. This is set out within Appendix 1.

SEA Guidance

Additional guidance which has informed the preparation of the SA include the Practical Guide to the SEA Directive (OPDM, 2005) and the EC Guidance on the Implementation of Directive 2001/42¹³. Although aged, these documents do provide practical guidance on the methods for compliance with the Directive and the Regulations, the background and context of the Directive and SEA and sustainable development steps.

¹³ https://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf

The role of Strategic Environmental Assessment, Sustainability Appraisal and Habitat Regulation Assessment

As this SA Report is prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, potential environmental effects are given full consideration alongside social and economic issues.

Local Plans may also require a Habitats Regulation Assessment, as set out within the Conservation of Habitats and Species Regulations (as amended) (2010), if it is considered that the plan policies may have likely significant effects on European habitats or species. The current and applicable version of the Regulations is the Conservation of Habitats and Species Regulations (2017), as amended¹⁴.

The HRA has been undertaken separately from this SA Report, but the findings have been taken into account where relevant.

Figure 3 Overlap of SEA, Interim SA and Habitat Regulation Assessment



2.4 Emerging Changes in relation to the SEA regime

The Levelling Up and Regeneration Bill was published in May 2022, and sought to introduce powers to replace the existing system of environment assessment (including both the Environmental Impact Assessment Directive (EIA) and Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment or SEA Directive) with a new domestic framework for environmental assessment known as ‘Environmental Outcomes Reporting’. This is intended to streamline the existing system by introducing an outcomes-based approach, which for plan-making means the creation of a more navigable framework to inform future policies and assessments.

Clause 161 (*Safeguards: non-regression, international obligations and public engagement*) of the Levelling Up and Regeneration Bill continues to enshrine the commitment to non-regression in law and ensures that the new system provides as much overall environmental protection as the current system.

Clause 169 (*Interaction with existing environmental assessment legislation and the Habitats Regulations*) mirror the position under the current system to allow for co-ordination between the processes and joint working, with a view to avoiding duplication.

¹⁴ The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).

In March 2023, the Department for Levelling Up, Housing and Communities hosted a consultation¹⁵ seeking views on the Environmental Outcome Reporting: A new approach to environment assessment. It is expected that Environmental Outcome Reports (EORs) will be more succinct and provide a short, high-level summary of how reasonable alternatives and the mitigation hierarchy (i.e. avoidance, mitigation, compensation) were arrived at for projects or plans. The consultation considered that guidance will be clear that realistic alternatives, fully consistent with the primary objectives of the project or plan, should be considered, with no need to assess and report against any options that would not be credible. The Bill, and consultation, also seek to emphasise the role of monitoring.

Whilst the sentiment of streamlined assessment and proportionality of assessment is supported throughout this assessment, given the Bill had not reached Royal Ascent during the preparation of this SA Report, the assessment continues to be guided by the SEA Directive, Environmental Assessment of Plans and Programmes Regulations 2004 and PPG.

2.5 Structure of the Sustainability Appraisal

Table 1 sets out how this SA Report corresponds to the relevant part of the SEA Directive, Environmental Assessment of Plans and Programmes Regulations 2004 and PPG.

¹⁵ <https://www.gov.uk/government/consultations/environmental-outcomes-reports-a-new-approach-to-environmental-assessment/environmental-outcomes-report-a-new-approach-to-environmental-assessment#what-an-environmental-outcomes-report-will-cover>

Table 1 Requirements of Planning Practice Guidance and SEA Directive

| Sustainability Appraisal Stage (Planning Practice Guidance) | | 2018 Scoping Report, updated in 2023 (presented at Appendix 1) | This SA Report | SEA Directive and Regulations requirements |
|--|---|--|---|--|
| Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope. | A1: Identifying other relevant plans, policies and programmes and sustainability objectives. | ✓ | Section 3: Baseline Stages A1 – A4: Scoping Report and Update, summarising the ‘current situation’ and implications for the Sustainability Appraisal Framework Appendix 1 Updated Scoping Report (2023) | (a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme (c) the environmental characteristics of areas likely to be significantly affected (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC (e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation |
| | A2: Collecting baseline information. | ✓ | | |
| | A3: Identifying sustainability issues and problems. | ✓ | | |
| | A4: Developing the sustainability appraisal framework. | ✓ | Section 3 Developing the Update to the Sustainability Appraisal Framework (Stage A4 Review) Appendix 1 Updated Scoping Report (2023) | |
| | A5: Consulting on the scope of the sustainability appraisal. | (April 2017) | Appendix 1 Updated Scoping Report (2023) | |
| Stage B: Developing and refining alternatives and assessing effects. | B1: Testing the Local Plan Objectives against the SA framework | | Section 4 Testing the Local Plan Publication Version Objectives, against the Sustainability Appraisal Framework | |
| | B2: Developing the Local Plan options including reasonable alternatives. | | Section 5 Developing the Local Plan Publication Version Options including the Strategic Reasonable Alternatives | (f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors (h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information; (i) a description of the measures envisaged concerning monitoring in accordance with Article 10; (j) a non-technical summary of the information provided under the above headings |
| | B3: Evaluate the likely effects of the Local Plan and alternatives. | | Section 6.3 Predicting and evaluating the effects of the draft Local Plan Publication Version Policies and Appendix 3 Assessing the effects of the Bristol Local Plan Pre-Submission Publication Version (November 2023) policies (Task B3) Section 6.3 Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Site Allocations, and Appendix 2 (Methodology) and Appendix 4 (Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Sites (Task B3) Section 6.4 Evaluating the overall total effects of the Local Plan | |
| | B4: Consider ways of mitigating adverse effects and maximising beneficial effects. | | Section 7 Mitigation | |
| | B5: Propose measures to monitor the significant effects of implementing the Local Plan. | | Section 8 Monitoring Options and Next Steps | (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme (i) A description of measures envisaged concerning monitoring in accordance with Regulation 17 |
| Stage C | Prepare the Publication Version of the Sustainability Appraisal Report | | This document. | |

3. Scoping Report and Update, the ‘current situation’ and implications for the Sustainability Appraisal Framework (Stages A1 – A4)

3.1 Overview of Baseline ‘Current Situation’ and Rationale for Update

As part of the SA process¹⁶, the scoping stage is an integral component of identifying the background evidence for use at subsequent stages of assessment. It comprises four iterative steps:

- **Task A1** – identifying other relevant plans and programmes and sustainability objectives (i.e. the policy context);
- **Task A2** – collecting baseline information (i.e. the sustainability context);
- **Task A3** – identifying key sustainability issues and problems; and
- **Task A4** – developing the SA Framework.

A detailed SA Scoping Report was prepared by BCC in February 2018 which set out the context and objectives, baseline and scope of the SA Framework. Using both analysis of baseline data in combination with the evaluation of relevant plans and programmes, the Scoping Report set out the SA Framework to be used to assess the effects of the (then) Local Plan Review, including the draft policies and spatial development proposals. The baseline analysis and resulting draft SA Scoping Report was issued for consultation in March 2017, with matters raised by consultees informing the final version of the SA Scoping Report. Subsequently, BCC published the Local Plan Review draft policies, draft site allocations, and proposals for protection of open space for consultation in March 2019.

Given the time that has elapsed since the Scoping Report was issued in February 2018 and the change in strategic context both with withdrawal of the Joint Spatial Plan (JSP) and West of England Spatial Development Strategy (SDS), it was considered necessary to review and update the baseline understanding of Sustainability Issues and SA Framework presented in the Scoping Report to ensure that it remains relevant. Although the Scoping Report was initially reviewed in March 2020 as part of the Interim SA Report (2019), it was acknowledged through a number of consultation responses that a more comprehensive review of the Scoping Report was necessary. The purpose of this was to develop a ‘current situation’ of baseline social, economic and environmental issues and revised SA Framework to appraise the emerging policies against. This is published at Appendix 1.

3.2 Identifying plans, policies and programmes, collecting baseline information and identifying sustainability issues (Stage A1 – A3 Review)

The term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft plan¹⁷.

¹⁶ Paragraph: 013 Reference ID: 11-013-20140306

¹⁷ Paragraph: 016 Reference ID: 11-016-20190722

Using both the 2018 Scoping Report and Framework Objectives, alongside the Interim SA Report (2019) as a starting point, the method used for updating the Scoping Report at Appendix 1 has been to consider the following information:

- **Changes to the policy context:** Key national, regional and local strategy and policy documents published have been included in this SA Scoping to generate a single consolidated baseline. This includes recent revisions to the NPPF, a decision to halt work on the SDS in May 2022 and emerging legislative and policy changes associated with the Levelling-Up and Regeneration Bill. Each new or amended document was reviewed to identify relevant objectives or policies for the Bristol Local Plan, and the way those objectives or any environmental considerations should be taken into account in plan preparation and their implications for the SA process.
- **Changes to the environmental, economic and social baseline:** A list of potential newly-published evidence base documents was identified. Most importantly, the updated SA Scoping Report reflects new evidence being made available by the Office for National Statistics from the Census 2021 that was retrieved in June 2023. Each document was reviewed to identify key baseline indicators, and their performance against any stated targets or comparators, the relationship with the plan area, and how key environmental considerations should be accounted for.

This information was used to determine any ‘key sustainability issues’ or changes to existing issues that should be incorporated within any update to the SA Framework, in accordance with SEA/SA guidance¹⁸ and the SEA Directive Regulations. Where these were identified, changes to the SA Framework (either objectives or decision-making criteria) were proposed. This impact of key sustainability issues on the Framework is set out at **Table 3**, whilst the ‘current situation’ as defined by this scoping stage is reflected in **Section 3.6**.

3.3 Overarching challenges encountered in compiling the SA Framework and Baseline Update, and the need for future updates

The SEA Directive and 2004 Regulations require the SA to consider difficulties, including technical deficiencies or lack of know-how, in compiling information. In addition, the Directive requires monitoring to identify ‘unforeseen adverse effects’ of a Plan or programme.

Following commencement of the Interim SA Report (2019), the Joint Spatial Plan was formally withdrawn following examination and work on the subsequent Spatial Development Strategy was halted, the UK entered a series of ‘lockdown’ periods as a result of the Covid-19 pandemic, and Brexit negotiations continued with the EU through the transitional period and culminated in the UK-EU Trade and Cooperation Agreement being signed in December 2020. In addition, proposals for national planning reform were published for consultation in August 2020, the subsequent Levelling Up and Regeneration Bill was published, and the Environment Act received Royal Assent.

The Interim SA Report (2019) acknowledged that the effects of these structural and regional shocks in part remained uncertain and will require the evidence baseline to be updated and reflected insofar

¹⁸ Informed by “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005) and RTPi Guidance: STRATEGIC ENVIRONMENTAL ASSESSMENT Improving the effectiveness and efficiency of SEA/SA for land use plans.

as is feasible in the future iterations of the Local Plan Sustainability Appraisal. The following summary of these shocks was therefore updated in summer 2023.

UK withdrawal from the EU ‘Brexit’

Following the formal departure of the UK from the EU in January 2020, a ‘transitional period’ was established which remained in place until 31st December 2020 to enable both sides to agree on the shape of a future partnership.

In December 2020, a draft **UK-EU Trade and Cooperation Agreement** was prepared and ratified between parties around six days before the transitional period ended and came into force on 1 January 2021. In relation to SEA, Article 7.2 states each party can set its own policies and priorities, however these must result in non-regression from levels of protection, and these must be consistent with international commitments. The Government remains subject to wider international duties, for instance the European Convention on Human Rights, the Aarhus Convention, the Paris Agreement (climate), the Espoo Convention (environmental assessment) and the Ramsar Convention (habitats). Therefore, for the purposes of this SA and in the absence of transposition of the UK-EU Trade Agreement in SEA legislation at the time of drafting, this has been prepared in accordance with the SEA Regulations of 2004.

Like many Core Cities in the UK, Bristol faces major uncertainties as a result of Britain’s departure from the EU. The South West still maintains a large trading relationship with the EU, with 42.2% of goods exported accounted for by the EU in 2022¹⁹, although this is reduced compared to 66% in 2014²⁰. Depending on how businesses continue to respond to the UK-EU Trade and Cooperation Agreement, there is largely uncertainty regarding: the impact of Sanitary and Phytosanitary (SPS) border controls on trade and competitiveness; the impact of Rule of Origin thresholds on supply chain and productivity; the impact on the migration of skilled workers within skills availability in specific sectors, with lower net-migration from the EU since 2016²¹; the scale and availability of the UK Shared Prosperity Fund; and the impact on cultural change and value of tourism.

Covid-19 pandemic

This SA Report was prepared following the Covid-19 pandemic, in which the outcome of the recovery continues to remain uncertain. Some of the evidence used to inform this SA Report has been impacted by the pandemic, for example the 2021 Census. Furthermore, other core evidence base has yet to be updated since the Covid-19 pandemic, most notably the 2019 English Indices of Deprivation.

There have been emerging trends in the aftermath of the Covid-19 pandemic, such as the rise of working from home, reduced city-centre footfall with a prevalence of online commerce, although the impact on travel appears to have been short lived. It is an identified and omnipresent challenge to sustainability appraisal to reflect the short, medium and longer-term implications of the recovery

¹⁹ House of Commons Library (2023) Statistics on UK-EU trade <https://commonslibrary.parliament.uk/research-briefings/cbp-7851/>.

²⁰ Centre for Cities (2017) Cities Outlook 2017

²¹ Bank of England (2022) Monetary Policy Report - August 2022

given the uncertainty of the evidence base and impact of other ongoing events , such as the ‘cost of living crisis’.

Table 2 Implications of the Covid-19 Pandemic

| Immediate and short-term implications: | Medium to long-term implications: |
|---|--|
| <ul style="list-style-type: none"> • Impact upon incomes/earnings, particularly for those in the lowest income brackets (concentrated in areas of highest deprivation); • Economic ‘shrinkage’, with considerable downturns within the food, retail and transport sectors; • Challenge to the delivery of social and domiciliary care for vulnerable people; • Uncertainty and backlog regarding prospective student enrolment at courses at UK universities; • Social distancing requiring the reconfiguration of public spaces and streets; and • Impacted local housing and property market, with a build-up of latent demand. | <ul style="list-style-type: none"> • Economic unproductivity and shifts within the labour market, particularly for younger people; • Awareness of the need to upgrade digital infrastructure and connectivity to allow for future work with equitable access for all communities; • A need to create greater resilience within the health and service economy; • Changes to demand for City Centre living and importance of outdoor spaces; • Emphasis on local centres (‘the 15-minute neighbourhood’) and green spaces; and • Slow recovery for specific industries. |

Changes in Strategic Planning Context within West of England

To ensure conformity with strategic level plan-making, the Bristol Local Plan Review March 2019 Consultation Draft was initially prepared in accordance with strategic policy direction established within the West of England Joint Spatial Plan (‘JSP’). However, on 7 April 2020, the West of England Joint Spatial Plan was withdrawn from the examination process following initial concerns raised by Inspectors in September 2019. Although withdrawn, the JSP largely drove the context for what was considered to be a ‘reasonable alternative’ at the time of preparing the Interim SA Report (2019).

Under the Combined Authorities (Spatial Development Strategy) Regulations 2018, the West of England Combined Authority remains mandated to prepare a Spatial Development Strategy (SDS) which establishes a reasoned justification for spatial development in the combined authority area and general policies. On 19 June 2020, the West of England Combined Authority (WECA) and its constituent authorities, along with North Somerset Council, agreed to begin work on the Spatial Development Strategy. However, by May 2022, work on the SDS had been halted and is no longer being progressed by the West of England Combined Authority.

The scale and extent of change at the strategic planning context within the West of England is reflected within each stage of the Bristol Local Plan preparation. Indeed, the context of this change resulted in the sharing of the Interim SA Report (2019) only internally with officers to aid the progression of the Future Consultation November 2022 and ultimately the preparation of the Pre-Submission Publication Version (2023).

The strategic planning context for Bristol’s Local Plan will be established through a process of cooperation with neighbouring councils.

The Environment Act 2021 and the Climate and Ecological Emergency

The Environment Act 2021 operates the UK's legal framework of environmental protection. The Act introduces new laws that relate to nature protection, water quality, clean air, as well as additional environmental protections that were originally set out within EU Law. It offers new powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.

Furthermore, in 2018 and 2020 respectively, Bristol City Council declared a climate and ecological emergency.

The provisions and requirements of the Environment Act and the Climate and Ecological Emergencies are reflected within the Bristol Local Plan Pre-Submission Publication Version (November 2023) and this SA Report. The impact of these changes were addressed within the Interim SA Report (2019), and this SA Report continues to reflect the ongoing policy position and actions plans.

Planning Reform and the Levelling Up and Regeneration Bill

In progressing the finalisation of the Interim SA Report (2019), the (then) Ministry of Housing, Communities and Local Government (MHCLG) outlined proposals to undertake significant reform of the planning system. The 'Planning for the Future' White Paper set out three main 'pillars' of proposals which aim to reform and streamline the planning process:

- *Pillar One:* Planning for development which seeks to establish a clearer and more predictable basis for the pattern and form of development in an area.
- *Pillar Two:* Planning for beautiful and sustainable places which is focussed on creating guidance and design codes through local community involvement.
- *Pillar Three:* Planning for infrastructure and connected places which outlined proposals focussed on refining the current system of developer contributions to infrastructure.

The Interim SA Report (2019) considered that future iterations of the SA should be reviewed in light of emerging proposals, particularly given significant changes to the standard method for assessing Local Housing Need²².

In response to this White Paper, the (now) Department for Levelling Up, Housing and Communities introduced the Levelling Up and Regeneration Bill to Parliament on 11 May 2022. Alongside draft clauses and policy proposals to significantly reform the SEA process (see Section 2.4), the Bill and associated policy paper set out a series of measures to significantly change the planning system. This includes increasing the weight of the development plan, introducing national development policies, providing clarity on the scope and role of Local Plans, removing the Duty to Cooperate and introducing changes to how infrastructure is delivered.

Two separate consultations have taken place since the publication of the Bill. The first published in December 2022, titled 'Levelling-up and Regeneration Bill: reforms to national planning policy' introduced extensive policy changes to the NPPF. Of relevance, this included proposals to:

²² MHCLG (August 2020) Changes to the current planning system - consultation on changes to planning policy and regulations

- Introduce new flexibilities to meet housing needs, such as: the possibility to use an alternative method for calculating need; to make clear that where housing need can be met only by building at densities which would be significantly out-of-character with the existing area could outweigh the benefits of meeting need in full; and finally, setting out that Local Planning Authorities (LPAs) are not required to review and alter Green Belt boundaries if this would be the only way of meeting need in full.
- Simplify and amend the tests of soundness by removing the test of 'justified'. Instead, the examination would only assess whether the Local Plan would meet needs so far as possible.
- Maintain the 'urban uplift' of 35% which applies to the 20 largest towns and cities in England. The Government intends to maintain this uplift, and to require that this is so far as possible met by the towns and cities concerned rather than exported to surrounding areas, except where there is voluntary cross-boundary agreement to do so.
- Replace the Duty to Cooperate with the 'alignment policy'
- Create National Development Management Policies which would be given the same weight in certain planning decisions as policies in local plans, neighbourhood plans and other statutory plans.

The second consultation launched in July 2023, related to 'plan-making reforms: consultation on implementation'²³. This consultation introduced greater evidence related to the 'tests of soundness', mandating a 30-month plan-making process and introducing gateway reviews, and a clearer approach to monitoring of plans.

3.4 Developing the Sustainability Appraisal Framework Update (Stage A4 Review)

Whilst the SA Framework itself is not a requirement of the SEA Directive or Regulations, it is a provision of the PPG and is a recognised approach when undertaking a Sustainability Appraisal which ensures a consistent and methodological approach. Using the 2023 Scoping Report, the SA Framework consists of three elements:

- **SA Framework Objectives:** These were established within the 2018 Scoping Report which formed part of the March 2019 consultation package. Objectives are statements of what is intended for the direction of the Plan, and have been retained from the 2018 Scoping Report subject to minor amendments.
- **SA Framework Decision-Making Criteria:** Best practice guidance indicates that competent authorities may choose to include more detailed decision-making criteria to ensure that all issues to be considered in the SA are incorporated. The 2018 Scoping Report established questions for 'how the objective will be used?', which were consulted on as part of the March 2019 consultation package and have been updated to reflect the 2023 Scoping Report.
- **Details for the assessment of Schedule 1 of the SEA regulations and descriptions of effects** (set out within the 'Adding definition to the SA Framework (Stage A4 Review)' below). This enables consistent judgement to be made and effects to be quantified where possible.

A summary of proposed changes to the SA Framework, including the underpinning justification for these, is set out in Table 3. The 2023 Scoping Report is presented in **Appendix 1** of this report.

²³ <https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation>

Table 3 Sustainability Appraisal Framework Update (Stage A4 Review)

| Topic | Key Sustainability Issues | Relevant Objective from Scoping Report 2018 | Decision Making Criteria from Scoping Report 2018 | Proposed Changes to Decision-Making Criteria based on Interim SA Report (2019) | Minor changes to Objectives and Decision Making Criteria (based on 2023 Scoping Report) | Final Objectives (used in this Report) | Final Decision-Making Criteria (DMC) (used in this Report) |
|-------------------------------------|---|--|--|---|---|---|--|
| Population, Housing and Communities | <ul style="list-style-type: none"> The city saw higher levels of population growth through the 2000s, particularly in central areas of Bristol. Since 2016, the population has grown at a slower rate in line with national trends. There has been above national average population growth for the ages 15 to 64 years. This has contributed to a high demand for new housing in an area with limited land supply. Bristol's population has become increasingly diverse. The city has experienced an above national average increase in house prices, with a higher housing affordability ratio than England's average at 9.71 compared to 8.96, meaning the average house price is almost ten times higher than average earnings in the city. Affordable housing targets have not been met consistently in recent years. Since 2009/10 the proposed target has only been met in 2021/22. There has been a rapid rise in homelessness and households living in temporary accommodation. <p>Sources: Office for National Statistics Census 2021; BCC The Population of Bristol 2022; Office for National Statistics EU Settlement Scheme quarterly statistic, March 2023; BCC Bristol Key Facts 2022; BCC Bristol Residential Development Survey 2022.</p> | 1. To ensure an adequate and diverse supply of housing that is affordable to everyone. | <ul style="list-style-type: none"> Would development provide sufficient housing to meet the identified needs of all communities within the city? Would development provide an appropriate mix of types of housing to meet the identified needs of all communities within the city? | <ul style="list-style-type: none"> Retain: Would development <u>or policy</u> provide sufficient housing to meet the identified needs of all communities within the city? Additional: <u>Would the development or policy ensure an adequate contribution to affordable housing?</u> Informed by: Planning for the Future: Preliminary Planning White Paper 2020; BCC Corporate Strategy 2018-2023; Bristol Housing Strategy 2016-2020; Bristol Housing Delivery Plan 2017-2020; Homelessness and Rough Sleeping Strategy 2019-2024; Affordable Housing Practice Note 2018. Refinement: Would the development or policy provide an appropriate mix of types of housing to meet the identified needs of all communities within the city, <u>without resulting in harm to existing communities?</u> Informed by: Managing the development of HMOs – Draft SPD (Consultation Version). Additional: <u>Would the development or policy enable alternative methods of delivery, including community-led and self-build?</u> Informed by: National Design Guide (2019). | <ul style="list-style-type: none"> No changes required. | 1. To ensure an adequate and diverse supply of housing that is affordable to everyone | <ul style="list-style-type: none"> DMC1: Would development or policy provide sufficient housing to meet the identified needs of all communities within the city? DMC2: Would the development or policy ensure an adequate contribution to affordable housing? 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? DMC4: Would the development or policy enable alternative methods of delivery, including community-led and self-build? |
| | | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land. | <ul style="list-style-type: none"> Would development provide an opportunity for the reuse or regeneration of previously developed land and/or increase in density? Would development result in the loss of greenfield land? | <ul style="list-style-type: none"> Refinement: Would development or policy provide an opportunity for the reuse or regeneration of previously developed land <u>and/or increase in density?</u> Additional: <u>Would development or policy provide an opportunity for a higher density within a sustainable location?</u> Informed by: NPPF (February 2019); Urban Living SPD; Bristol Transport Strategy 2019; Planning for the Future: Preliminary Planning White Paper 2020. Refinement: Would development or policy <u>result in the loss of</u> maintain greenfield land and maintain the openness and permanence of the Green Belt? Informed by: NPPF (February 2019). | <ul style="list-style-type: none"> No changes required. | 2. Promote the conservation and wise use of land, maximising the re- use of previously developed land | <ul style="list-style-type: none"> DMC5: Would development or policy provide an opportunity for the reuse or regeneration of previously developed land? DMC6: Would development or policy provide an opportunity for a higher density within a sustainable location? DMC7: Would development or policy maintain greenfield land and maintain the openness and permanence of the Green Belt? |
| | | 3. Ensure easy and affordable access to key services. | <ul style="list-style-type: none"> Would development result in a net gain of community or service facilities? Would development be ensured to be | <ul style="list-style-type: none"> Retain: Would development <u>or policy</u> result in a net gain of community or service facilities? Retain: Would <u>development be within, or would policy ensure development is within,</u> easy walking distance of key services (e.g. GP, Post office, community centre)? | <ul style="list-style-type: none"> No changes required. | 3. Ensure easy and affordable access to key services | <ul style="list-style-type: none"> 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)? |
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| Topic | Key Sustainability Issues | Relevant Objective from Scoping Report 2018 | Decision Making Criteria from Scoping Report 2018 | Proposed Changes to Decision-Making Criteria based on Interim SA Report (2019) | Minor changes to Objectives and Decision Making Criteria (based on 2023 Scoping Report) | Final Objectives (used in this Report) | Final Decision-Making Criteria (DMC) (used in this Report) |
|-------------------------|---|--|---|---|---|---|--|
| | | 4. Increase participation in cultural and community activities. | within easy walking distance of key services (e.g. GP, Post office, community centre)? | Informed by: BCC Corporate Strategy 2018 – 2023. | <ul style="list-style-type: none"> No changes required. | 4. Increase participation in cultural and community activities | <ul style="list-style-type: none"> DMC9: Would development or policy result in a net gain of community or service facilities? |
| Health and Inequalities | <ul style="list-style-type: none"> As reported in the Census 2021, Bristol has a higher percentage of households that are not affected by any measure of deprivation, than the national average. However, it also contains some of the most deprived areas in the country, with some areas within the 10% worst performing in the Indices of Deprivation. The percentage of Bristol's residents living in the most deprived areas in England fell slightly between the release of the 2015 indices and the 2019 indices, from 16% to 15%. There is a significant gap in healthy life expectancy between Bristol's most and least deprived areas. Healthy life expectancy is also lower than the national average for men and women in Bristol. Bristol performs poorly in relation to the English average in terms of its 'life satisfaction score' and a sizeable proportion (21%) of Bristol residents have 'below average mental wellbeing', with a higher proportion (34.2%) reporting similar issues in the most deprived areas. There is disparity across the city in terms of educational attainment. Deprived areas perform more poorly than less deprived in terms of education attainment at GCSE level and those progressing to higher education. Child poverty continues to be higher than the national average, although levels of fuel poverty are slightly lower than the national average. There has been a recent increase in the proportion of households who have experienced moderate to severe "food | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage. | <ul style="list-style-type: none"> Would development result in an improved built environment for deprived areas? Would development offer potential for regeneration or investment in deprived areas? | <ul style="list-style-type: none"> Retain: Would <u>development or policy</u> contribute to improvements in the built environment in deprived areas? Retain: Would <u>development or policy</u> offer potential for regeneration or investment in deprived areas (i.e. <u>new homes, jobs and infrastructure</u>)? | <ul style="list-style-type: none"> No changes required. | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | <ul style="list-style-type: none"> DMC10: Would development or policy contribute to improvements in the built environment in deprived areas? DMC11: Would development or policy offer potential for regeneration or investment in deprived areas (i.e. new homes, jobs and infrastructure?) |
| | | 6. To reduce health inequalities and promote healthy lifestyles across the city. | <ul style="list-style-type: none"> Would development contribute to positive wellbeing, e.g. access to open space and pleasant surroundings and living conditions, freedom from noise and pollution? Would development make walking and cycling easy and attractive as routine methods of transport, and also facilities healthy eating choices? | <ul style="list-style-type: none"> Additional: <u>Would development or policy contribute to improving air quality?</u> Informed by: UK Clean Air Strategy; Bristol City Council Clean Air Plan. Refinement: Would <u>development or policy</u> contribute to positive wellbeing and <u>healthy lifestyles, including good living conditions and access to open spaces, pleasant surroundings and healthier food choices?</u> Informed by: Updated PPG and Bristol Health and Well-being Strategy 2020-2025; New Protection for Open Space – Consultation. Retained: Would development or policy make walking and cycling easy and attractive as routine methods of transport? | <ul style="list-style-type: none"> No changes required. | 6. To reduce health inequalities and promote healthy lifestyles across the city | <ul style="list-style-type: none"> DMC12: Would development or policy contribute to improving air quality? 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?²⁴ DMC14: Would development or policy make walking and cycling easy and attractive as routine methods of transport? |
| | | 7. Ensure access to education and learning for all sections of society. | <ul style="list-style-type: none"> Would development result in a net gain of educational facilities? Would development be ensured to be within easy walking distance of educational services? | <ul style="list-style-type: none"> Retain: Would development <u>or policy</u> result in a net gain of adequate educational facilities? Retain: Would development <u>or policy</u> ensure that educational services are located within easy walking distance? | <ul style="list-style-type: none"> No changes required. | 7. Ensure access to education and learning for all sections of society | <ul style="list-style-type: none"> DMC15: Would development or policy result in a net gain of adequate educational facilities? DMC16: Would development or policy ensure that educational services are located within easy walking distance? |

²⁴ Note that access to services and facilities (including healthcare facilities and GPs) is addressed through SA objective 3 and has not been considered through SA objective 6 to avoid 'double counting'.

| Topic | Key Sustainability Issues | Relevant Objective from Scoping Report 2018 | Decision Making Criteria from Scoping Report 2018 | Proposed Changes to Decision-Making Criteria based on Interim SA Report (2019) | Minor changes to Objectives and Decision Making Criteria (based on 2023 Scoping Report) | Final Objectives (used in this Report) | Final Decision-Making Criteria (DMC) (used in this Report) |
|------------------------|---|--|--|--|---|---|--|
| | <p>insecurity” in the 12 months up to 2022.</p> <ul style="list-style-type: none"> In terms of active lifestyles and environment: Over half of the local population is classed as obese, although this lower than the national average. Air quality exceeds legal limits in parts of the city, which has health implications. The percentage of people walking or cycling to work fell from 39% to 32% between 2021 and 2022. <p>Sources: Office for National Statistics Census 2021; Office for National Statistics English indices of deprivation 2019; BCC JSNA Health and Wellbeing Profile 2022/23; Office for National Statistics Personal well-being in the UK 2022.</p> | | | | | | |
| Economy and Employment | <ul style="list-style-type: none"> Bristol has a higher employment rate than the national average. Gross Value Added per hour worked rose from 2020 to 2021 but is lower than the higher for the UK. There is a strong community of enterprise in Bristol; with between 2,400 and 2,800 business created within the city each year between 2019 and 2021. There are pressures on city centre land to meet the needs of commercial and residential space. In recent years there has been notable losses in office and industrial floorspace. There has been a net increase at Avonmouth in industrial and warehousing during this period. Footfall to the city centre is down in line with trends across regional city centres at which a 40% reduction in August 2020 was reported compared to pre-Covid levels. Variable levels of retail vacancy rates have been reported in the city centre with the Cabot Circus, Broadmead and The Galleries area reporting the highest rate at 17.7%. | 8. To support the economy and ensure that there are suitable opportunities for employment. | <ul style="list-style-type: none"> Would development provide a range of high-quality employment land to meet the identified needs of all communities within the city Would development regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment? Would development result in the loss of any existing strategic employment opportunities? | <ul style="list-style-type: none"> Refinement: Would development <u>or policy</u> provide a range of high quality employment spaces to meet the identified needs of all communities <u>and employers</u> within the city? Informed by: Draft SBSUD Strategy 2018. Additional: <u>Would development or policy support opportunities for growth (i.e. creation of employment spaces, supporting infrastructure etc.) in priority employment sectors?</u> Informed by West of England Local Industrial Strategy 2019 (aerospace; creative, cultural and digital industries; and financial, business and legal ‘tech’ services); Draft SBSUD Strategy 2018 (low carbon, innovation and knowledge-based sectors) Refinement: Would development <u>or policy</u> regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment? Informed by: Draft SBSUD Strategy 2018; Bristol One City Plan Refinement: Would development or policy maintain result in the loss of any existing strategic employment opportunities? Additional: <u>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?</u> | <ul style="list-style-type: none"> No changes required. | 8. To support the economy and ensure that there are suitable opportunities for employment | <ul style="list-style-type: none"> 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? 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 |

| Topic | Key Sustainability Issues | Relevant Objective from Scoping Report 2018 | Decision Making Criteria from Scoping Report 2018 | Proposed Changes to Decision-Making Criteria based on Interim SA Report (2019) | Minor changes to Objectives and Decision Making Criteria (based on 2023 Scoping Report) | Final Objectives (used in this Report) | Final Decision-Making Criteria (DMC) (used in this Report) |
|-------------------------|--|---|---|--|--|---|---|
| | <i>Sources: Office for National Statistics Census 2021; Office for National Statistics Business demography, UK: 2020; Bristol Development Monitoring Report 2021; West of England Combined Authority Bristol City Centre & High Streets Recovery and Renewal Programme 2021.</i> | | | Informed by: BCC Climate Strategy; Draft SBSUD Strategy 2018; Bristol One City Plan | | | reducing the need to travel for employment, improving digital connectivity or delivering low or zero carbon employment spaces? |
| | | 9. Ensure access to a range of shopping facilities for all sections of society. | <ul style="list-style-type: none"> Would development offer the opportunity to support and enhance the vitality and viability of retail centres? Would development be ensured to be within easy walking distance of retail services? | <ul style="list-style-type: none"> Refinement: Would development <u>or policy</u> enhance <u>and diversify</u> the vitality and viability of local / retail <u>centres</u>? Refinement: Would <u>development be, or policy ensure, development</u> is within easy walking distance of retail services? | Update to decision making criterion to ensure that effects relating to the city centre (as well as local and retail centres) are appropriately addressed through the assessment work. | 9. To ensure access to a range of shopping facilities for all sections of society | <ul style="list-style-type: none"> DMC22: Would development or policy enhance and diversify the vitality and viability of the city, local and / or retail centres? DMC23: Would development be, or policy ensure, development is within easy walking distance of retail services? |
| Townscape and Landscape | <ul style="list-style-type: none"> Balancing the need for providing new residential and commercial development with retaining the character of Bristol's varied townscape and green infrastructure: <ul style="list-style-type: none"> Bristol contains a substantial number of designated heritage assets. Bristol has 33 Conservation Areas. Green and blue infrastructure is a critical provision for a range of habitats and species, as well as the human population: <ul style="list-style-type: none"> 15% of Bristol, or 1,787ha is protected for wildlife. Development in the city has potential to impact upon the Natura 2000 sites Severn Estuary and the Avon Gorge Woodlands. Habitats in Bristol form part of the wider West of England Nature Recovery Network. Most local residents are satisfied with parks and open spaces, but this falls to a lower level in the most deprived areas. <p><i>Sources: BCC Bristol Key Facts 2022; West of England Nature Partnership Nature Recovery Network Map 2021.</i></p> | 10. To ensure the protection and enhance historic environment and its setting. | <ul style="list-style-type: none"> Would development result in the degradation of heritage assets? | <ul style="list-style-type: none"> Refinement: Would development or policy avoid result in the degradation of heritage assets, townscape and landscape? <p>Informed by: Urban Living SPD.</p> | <ul style="list-style-type: none"> Update to SA objective and decision making criteria to better reflect the requirement of the NPPF for planning policies to ensure the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure. Update to the SA objective to ensure appropriate coverage of the decision making criterion which addresses the conservation and enhancement of landscape and townscape. | 10. To ensure the conservation and enhancement of local character including important landscape features and the historic environment and its setting | <ul style="list-style-type: none"> DMC24: Would development or policy support the conservation and enhancement of heritage assets, townscape and landscape? |
| | | 11. To ensure the protection and enhancement biological and | <ul style="list-style-type: none"> Would development result in the degradation of biological and geological assets? | <ul style="list-style-type: none"> Refinement: Would development or policy protect biological, geological and nationally or internationally designated nature conservation assets from adverse effects? | <ul style="list-style-type: none"> Update to SA objective and decision making criterion to better reflect the | 11. To ensure the conservation and enhancement biological and geological assets | <ul style="list-style-type: none"> DMC25: Would development or policy conserve and / or enhance biological, geological and |

| Topic | Key Sustainability Issues | Relevant Objective from Scoping Report 2018 | Decision Making Criteria from Scoping Report 2018 | Proposed Changes to Decision-Making Criteria based on Interim SA Report (2019) | Minor changes to Objectives and Decision Making Criteria (based on 2023 Scoping Report) | Final Objectives (used in this Report) | Final Decision-Making Criteria (DMC) (used in this Report) |
|------------------------|---|---|---|---|---|--|--|
| | | geological assets and improve the quality of wildlife habitats. | | <p>Informed by: Natural England response to SA Scoping 2018</p> <ul style="list-style-type: none"> Additional: <u>Would development or policy enable a net gain in biodiversity?</u> Informed by: NPPF 2019; National Design Guide; 25-Year Environment Plan. | requirement of the NPPF for planning policies to ensure the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure. Also to ensure non-statutory designations are appropriately addressed through the SA framework. | and improve the quality of wildlife habitats | <p>nationally or internationally designated nature conservation assets as well as non-statutory designations?</p> <ul style="list-style-type: none"> DMC26: Would development or policy enable a net gain in biodiversity? |
| | | 12. To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation. | <ul style="list-style-type: none"> Would development offer the opportunity to enhance or result in a net gain to GI? | <ul style="list-style-type: none"> Refinement: Would <u>development or policy maximise</u> the opportunity to <u>provide multifunctional green infrastructure</u>? Informed by: BCC Climate Strategy; NPPF 2019; National Design Guide; 25-Year Environment Plan. | <ul style="list-style-type: none"> No changes required. | 12. To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation | <ul style="list-style-type: none"> DMC27: Would development or policy maximise the opportunity to provide multifunctional green infrastructure? |
| Transport and Movement | <ul style="list-style-type: none"> Congestion continues to impede movement particularly in the city centre. The level of car availability in Bristol is the highest of the Core Cities. With a number of new transport schemes coming forward (such as MetroWest), there is a need to ensure that growth is integrated. With the exception of walking, the proportion of residents who travel regularly by all modes is reported to have fallen between 2019 and 2021. The number of road miles travelled by motor vehicle in the city fell | 13. To encourage a demonstrable modal shift and reduce the need to travel. | <ul style="list-style-type: none"> Would development offer an opportunity to improve access to and quality of sustainable transport modes for all communities, to allow sustainable movement throughout the city? Would development offer an opportunity to support the delivery of new transport infrastructure? | <ul style="list-style-type: none"> Refinement: Would development <u>or policy</u> offer an opportunity to improve access to and quality of sustainable transport modes (walking, cycling and public transport) for all communities, to allow sustainable movement throughout the city? Informed by: BCC Climate Strategy; Bristol One City Plan; updated PPG and National Design Guide; Bristol Transport Strategy 2019; West of England Local Cycling and Walking Infrastructure Plan. Refinement: Would development <u>or policy</u> offer an opportunity to support the delivery of new transport <u>and digital</u> infrastructure? Informed by: Bristol Transport Strategy 2019; Bristol One City Plan. | <ul style="list-style-type: none"> Update to decision making criteria to ensure that appropriate consideration is given to the viability of sustainable transport and the provision of infrastructure to support its functioning over the plan period. | 13. To encourage a demonstrable modal shift and reduce the need to travel | <ul style="list-style-type: none"> DMC28: Would development or policy offer an opportunity to support improve access to and viability and quality of sustainable transport modes (walking, cycling and public transport) for all communities? DMC29: Would development or policy offer an opportunity to support the delivery of new transport (including for sustainable transport) and digital infrastructure? |

| Topic | Key Sustainability Issues | Relevant Objective from Scoping Report 2018 | Decision Making Criteria from Scoping Report 2018 | Proposed Changes to Decision-Making Criteria based on Interim SA Report (2019) | Minor changes to Objectives and Decision Making Criteria (based on 2023 Scoping Report) | Final Objectives (used in this Report) | Final Decision-Making Criteria (DMC) (used in this Report) |
|---------------------------|--|---|---|--|---|--|--|
| | <p>substantially in 2020 as a result of Covid-19. However, there was an increase in the figure reported in 2021 towards but not equivalent to the level reported in previous years.</p> <p><i>Sources: Office for National Statistics Census 2021; Department for Transport Road Traffic Statistics: Local Authority City of Bristol 2021; BCC and Sustrans Bristol Walking and Cycling Index 2021.</i></p> | 14. To maintain and improve the existing highway network. | <ul style="list-style-type: none"> Would development likely bring an increase in levels of traffic, and is this in an area already experiencing congestion issues? Would development offer an opportunity to enhance or improve the existing network? | <ul style="list-style-type: none"> Refinement: Would development <u>or policy</u> likely bring an increase in levels of traffic in an area already experiencing congestion issues? Refinement: Would development <u>or policy</u> offer an opportunity to enhance or improve the existing highway network? | <ul style="list-style-type: none"> No changes required. | 14. To maintain and improve the existing highway network | <ul style="list-style-type: none"> DMC30: Would development or policy likely bring an increase in levels of traffic in an area already experiencing congestion issues? DMC31: Would development or policy offer an opportunity to enhance or improve the existing highway network? |
| Climate, Energy and Waste | <ul style="list-style-type: none"> A Climate Emergency was declared by BCC in 2015 setting the goal of making Bristol carbon neutral by 2030. Total carbon emissions have fallen in recent years as have emissions per capita. Emissions per capita are also lower than the surrounding local authority areas of South Gloucestershire, North Somerset and Bath and North East Somerset. While emissions from transport have fallen in recent years, they still comprise a large proportion of total emissions for the city. Air pollution exceeds legal limits for NO2 and PM10 in parts of the city defined as AQMAs, which has adverse health implications and contribute to increased deaths. BCC has introduced a CAZ to ensure Bristol meets legal limits for air pollution within the shortest possible time. There are high flood risk areas situated around existing water courses, and areas at risk of surface water flooding, particularly in the city centre and at Avonmouth. No waterbodies in Bristol presently achieve 'good' water status as a result of impacts relating to flood protection / land drainage schemes and development²⁵. | 15. To reduce the risk of flooding from all sources. | <ul style="list-style-type: none"> Would development be directed towards lower flood risk areas or offer opportunities to significantly reduce flood risk? Would development promote the use of sustainable drainage systems? | <ul style="list-style-type: none"> Refinement: Would development <u>or policy</u> be directed towards lower flood risk areas <u>and</u> / or offer opportunities to significantly reduce flood risk? Informed by: BCC Climate Strategy Additional: <u>Would development or policy support sustainable and resilient flood risk management?</u> Informed by: BCC Climate Strategy | <ul style="list-style-type: none"> No changes required. | 15. To reduce the risk of flooding from all sources | <ul style="list-style-type: none"> DMC32: Would development or policy be directed towards lower flood risk areas and / or offer opportunities to significantly reduce flood risk? DMC33: Would development or policy support sustainable and resilient flood risk management? |
| | | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled. | <ul style="list-style-type: none"> Would development have an effect on water resources? Would development likely have an effect on water quality and would it provide opportunity to improve water quality? | <ul style="list-style-type: none"> Retain: Would development <u>or policy</u> have a <u>beneficial</u> effect on water resources? Informed by: 25-Year Environment Plan objectives; Updated PPG; Wessex Water Resources Management Plan (2019) Retain: Would development <u>or policy</u> likely have an effect on water quality, and would it provide opportunity to improve water quality? Additional: <u>Would development or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production?</u> Informed by: BCC Climate Strategy; Bristol One City Plan; Urban Living SPD Additional: <u>Would development or policy maximise opportunities to support sustainable urban food production?</u> Informed by: Bristol One City Plan. | <ul style="list-style-type: none"> No changes required. | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | <ul style="list-style-type: none"> DMC34: Would development or policy have a beneficial effect on water resources? DMC35: Would development or policy likely have an effect on water quality, and would it provide opportunity to improve water quality? DMC36: Would development or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production? DMC37: Would development or policy maximise opportunities to support sustainable urban food production? |

²⁵ Note that for the 2019 assessment of chemical status of waterbodies the Environment Agency changed some methods and increased the related evidence base. Due to these changes, all water bodies now fail chemical status and this assessment is not comparable to previous years assessments.

| Topic | Key Sustainability Issues | Relevant Objective from Scoping Report 2018 | Decision Making Criteria from Scoping Report 2018 | Proposed Changes to Decision-Making Criteria based on Interim SA Report (2019) | Minor changes to Objectives and Decision Making Criteria (based on 2023 Scoping Report) | Final Objectives (used in this Report) | Final Decision-Making Criteria (DMC) (used in this Report) |
|-------|--|--|--|---|---|---|--|
| | <ul style="list-style-type: none"> There is a need to reduce non-renewable energy use as part of climate change mitigation and adaptation. Adaptation to the potential effects of climate change, including flooding, sea level rise and urban heat island effect also needs to be achieved. Levels of waste being sent to landfill need to be further reduced while rates of recycling should continue to be promoted. <p><i>Sources: Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy UK local authority and regional greenhouse gas emissions national statistics 2022; BCC 2022 Air Quality Annual Status Report; Environment Agency Catchment Data Explorer: Avon Bristol Urban Operational Catchment 2019; Department for Environment, Food & Rural Affairs Local authority collected waste: annual results 2022.</i></p> | 17. Minimise air and noise pollution | <ul style="list-style-type: none"> Would development minimise exposure to pollution or offer opportunity to reduce pollution? | <ul style="list-style-type: none"> Retain: Would development minimise exposure to pollution or offer opportunity to reduce pollution? Informed by: Updated PPG; Clean Air Strategy 2019; Air Quality Plan for NO2 in the UK; WHO Strategy²⁶). | <ul style="list-style-type: none"> No changes required. | 17.Minimise air and noise pollution | <ul style="list-style-type: none"> DMC38: Would development minimise exposure to pollution or offer opportunity to reduce pollutions? |
| | | 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. | <ul style="list-style-type: none"> Would aspirational targets for energy efficiency in new development be set? Would development provide opportunities for a net gain in renewable energy production within the Plan area? Does the option ensure that new development is resilient to the effects of climate change? | <ul style="list-style-type: none"> Refinement: Would development <u>or policy</u> enable aspirational targets for energy efficiency to be achieved? Refinement: Would development <u>or policy</u> provide opportunities for a net gain in renewable energy <u>production and zero carbon energy supply</u> within the Plan area? Informed by: Updated PPG; BCC Climate Strategy; West of England Industrial Strategy 2019; updated PPG; SUD Strategy 2018; updated PPG and incoming Planning White Paper²⁷ Additional: <u>Would development or policy provide opportunities for the use of low carbon and decentralised energy sources (including energy networks)?</u> Informed by: BCC Climate Strategy. Refine: Would development or policy <u>increase resilience</u> to the effects of climate change? | <ul style="list-style-type: none"> No changes required. | 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 | <ul style="list-style-type: none"> DMC39: Would development or policy enable aspirational targets for energy efficiency to be achieved? DMC40: Would development or policy provide opportunities for a net gain in renewable energy production and zero carbon energy supply within the Plan area? DMC41: Would development or policy provide opportunities for the use of low carbon and decentralised energy sources (including energy networks)? DMC42: Would development or policy increase resilience to the effects of climate change? |

²⁶ The Strategy sets out a long-term target to reduce the population's exposure to PM2.5.

²⁷ Aspiration set out within Planning for the Future (March 2020) for housing to meet or exceed the 80% lower carbon emissions threshold for new housing development by 2025.

3.5 Adding definition to the SA Framework (Stage A4 Review)

The categories of significance of effects that have been applied throughout the Sustainability Appraisal were defined at the scoping stage. These categories of significance have been supplemented with further detail within Table 4 to ensure that these are directly related to the SA Framework. This Framework will be used throughout the assessment of reasonable alternatives, policy options and proposed site allocations.

Good practice guidance considers that potential effects need to be quantified where possible, or a judgement made against the baseline 'current situation' where this was not achievable based on available evidence. Effects have therefore been assessed as accurately as possible given the availability of information, or recommendations for additional evidence to support justification are made.

For broad growth areas or proposed site allocations, proposed boundaries have been assessed against a more prescribed criteria for assessment which has included greater definition to the 'categories of significance' below. More prescribed criteria are set out within **Appendix 2**, with the detailed site appraisals set out as follows:

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

In determining significance of effects, combined symbols were sometimes used (for example '+/?' or '-/?') as often there is a strong likelihood of positive/negative effects but insufficient information to ensure certainty at this stage.

Table 4 Categories of significance

| Symbol | Meaning | Description of effect | |
|--------|----------------------|---|--|
| | | Initial Scoping Report 2018 description | Revised detail description (used in this report) |
| ++ | Significant positive | Proposed development encouraged as would resolve existing sustainability problem | Proposed development or policy likely to have a potentially significant positive effect |
| + | Minor positive | No sustainability constraints and proposed development acceptable | Proposed development or policy likely to have a potentially minor positive effect |
| 0 | Neutral | Neutral effect | Neutral, not considered likely to have an effect |
| ? | Uncertain | Uncertain or unknown effects | Uncertain or unknown effects (based on final implementation or further information needed) |
| - | Minor negative | Potential sustainability issues: mitigation and/or negotiation possible | Proposed development or policy likely to result in a potentially minor negative effect |
| -- | Significant negative | Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive | Proposed development or policy would be likely to have a potentially significant negative effect |

Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 (“the SEA regulations”) and Annex 2 of the SEA Directive 2001 provide criteria which should be considered when determining significance of effects on the environment.

Likely effects identified as a result of implementing the policies have been described in the appraisal commentary according to these criteria which includes a description of the probability, duration, frequency and reversibility of impacts; definitions of which have been provided in Table 5.

Table 5 Descriptions of effect

| Descriptions of effect | |
|----------------------------------|---|
| Probability and Frequency | <p>The assessment considers the likelihood that the effect would occur in accordance with the significance of effects however this is dependent upon the information available at this stage. The scope of this is as follows:</p> <ul style="list-style-type: none"> • Uncertainty – it is unclear whether the effect will occur as assessed (?); and • More certainty – the effect is likely to occur as assessed (no symbol). <p>Effects may vary in frequency of occurrence, for example the effect may be a one-off occurrence or occur regularly as new development is brought forward. This has been assessed through consideration of certainty across the durations set out below.</p> |
| Duration | <p>The new Local Plan will span a 20-year period between 2016 and 2036 and the SA will assess potential impacts within the same period. The temporal scope of the SA was set out in the Scoping Report and is as follows:</p> <ul style="list-style-type: none"> • Short-term – those effects that occur within the first five years of implementation of the new Local Plan; • Medium-term – those effects that occur between five and fifteen years following the adoption of the new Local Plan; and • Long-term – those effects that will occur beyond fifteen years (including those that will endure beyond the plan period such as Green Belt designation). |
| Reversibility | Effects may be temporary (T) or permanent (P) in nature. |
| Spatial scale | <p>The assessment will include a consideration of the spatial extent of the effects in accordance with the following scales:</p> <ul style="list-style-type: none"> • Local (affecting a locality for example Redcliffe or Bedminster) • City-wide (affecting the whole Plan area) • City-wide and transboundary (affecting the Plan area and beyond) |

3.6 Summarising the ‘Current Situation’

Section 4, 5, 6 and 7 of this Main Report assess the Publication Version November 2023 Draft Local Plan reasonable alternatives policies, policies and allocations for their impacts compared to the ‘current situation’ of adopted policies, known information and baseline sustainability issues as identified in the SA Scoping Report (**Appendix 1**).

As the Local Plan by its nature proposes development, this will have some inevitable environmental consequences that will require mitigation. However, if the Local Plan was appraised compared to a scenario of ‘likely evolution without the Plan’, much of the appraisal would be positive given the Plan’s role and objectives for sustainable growth and development. Therefore, using the information that has informed the Sustainability Appraisal Framework, Table 6 summarises the ‘current situation’ and the ‘likely evolution without the Plan’ as set out within Appendix 1.

Table 6 Summarising the ‘Current Situation’ against the SEA Topics

| SEA Topic | Current situation | Likely future without Plan | Key sustainability issues |
|-------------------------------------|-------------------|----------------------------|---|
| Population, housing and communities | | | <p>Bristol is experiencing above national average population growth, with housing delivery, affordability and availability of housing for all remaining a key issue.</p> <p>The Local Housing Needs Assessment (2023) identified that, using the standard methodology with the urban uplift, there was a 20-year dwelling growth of 67,600 homes. This was significantly more than the rate of growth based on the most recent official household projections over the same period, which was identified a need for 31,300 new households. The plan aims to meet and exceed this housing requirement. In absence of the plan, meeting this housing need would be likely be less coordinated and uncertain, with opportunities to exceed this target being unclear.</p> <p>Housing delivery and housing affordability remains a key issue, where Bristol has experienced an above national average increase in house prices (90% in the last 10 years) and a higher housing affordability ratio than England’s average. a rapid rise in homelessness and households living in temporary accommodation. The Local Housing Needs Assessment indicates that the there is a need to provide for 8,646 households unable to afford to rent or buy over the plan period 2020 – 2040. The LHNA notes that there remains a net increase of existing households needing affordable housing in Bristol each year, with Bristol only reaching its affordable housing completions target once since 2009/10, in 2021/2022. Supply of affordable housing is particularly poor in Bristol as any residential sites have high redevelopment costs due to their brownfield status, or high existing or alternative values²⁸. In absence of the Plan, and associated policies related to deliver of more homes and more affordable housing, this problem would likely be exacerbated.</p> <p>Data indicates an increasingly diverse community within Bristol, with increasing numbers of university students, ethnic backgrounds and a range of incomes, and a substantial level of Gypsy and Traveller communities. These communities all require different needs, homes and services; without conscious inclusion in planning for different communities, the challenges these groups face are likely to increase. Without a plan, service and infrastructure would fall behind population growth and lead to some communities without appropriate access to such facilities.</p> <p>Between 2001 and 2021, 37,200 dwellings were built²⁹, the vast majority of which were delivered on brownfield land, with a very small proportion being built on greenfield sites. Bristol City Council has carried out a thorough urban potential assessment which has established the capacity of the urban area to deliver around a further 12,400 homes by 2036 on sites of ten or more dwellings. Without intervention, and consideration of other greenfield sites, it is unlikely that housing need within Bristol would be achieved.</p> |
| Health and inequalities | | | <p>Bristol contains some of the most deprived areas in the country, with 41 LSOAs falling within the most deprived 10% in England for Multiple Deprivation 2019.</p> <p>Of these, only five LSOAs have moved out of the 10% decile since 2015, whilst at the same time four LSOAs have moved into the worst performing 10% (Sherrin Way, Withywood, Hicks Gate and Hengrove West). Whilst there are a slightly lower proportion of residents which live in the most deprived areas of the city, inequality still persists. Without a plan, and strategic targeting of deprivation, the most deprived areas may continue to see no change in the current situation.</p> |

²⁸ SD14J Topic Paper 6 Affordable Housing April 2018

²⁹ ORS (2022) Reviewing the demographic evidence for the City of Bristol to establish local housing need

| SEA Topic | Current situation | Likely future without Plan | Key sustainability issues |
|-------------------------|-------------------|----------------------------|--|
| | | | <p>In addition, significant life expectancy inequalities exist within the City. Mental health issues are more prevalent within Bristol's population than nationally, obesity rates are high and there are health impacts associated with air quality exceedances of legal limits in several areas of the city. In terms of educational attainment, significantly fewer young people go on to higher education compared to the national average (31.6% to 42.2%). There is disparity across the city in terms of educational attainment, with deprived areas below the national average. The Local Plan can ensure the built environment contributes to delivering health benefits, and supports healthy, inclusive and active communities. Without a Plan in place, development is less likely to deliver health benefits.</p> <p>Walking and cycling remain popular options of travel for Bristol residents, although the number walking or cycling to work reduced in 2022 compared to 2021. The level of car ownership remains high (the highest of the UK Core Cities). Without a Plan in place to require upgrades to transport networks, site permeability, and facilities, development is less likely to deliver improvements to the transport network.</p> |
| Economy and employment | | | <p>Bristol has had strong economic performance with high SME survival, a high employment rate and a high graduate retention rate. However, Bristol continues to have deprivation 'hotspots' that are amongst some of the most deprived areas in the country, based on earnings inequalities, underperformance in education and skills and pay and skills gaps.</p> <p>Without the Local Plan, there will be no opportunity to balance the provision of employment space and residential provision across the City or access to education / skills, and therefore, areas of deprivation would be likely to prevail.</p> |
| Townscape and landscape | | | <p>Green and blue infrastructure, providing a range of habitats and is critical to the functioning of the city:</p> <ul style="list-style-type: none"> • Approximately a fifth of the City's land area is given over to various forms of green spaces. • Around 15%, or 1,787ha, is protected for wildlife, and there are 1,564ha of publicly accessible parks and green spaces. • The Plan area covers a number of Site of Special Scientific Interest (SSSIs), includes Special Areas of Conservation (SACs), and is bounded by the Severn Estuary Ramsar and SSSI. • Numerous locally designated Sites of Nature Conservation Interest (SNCI) and Local Nature Reserves cover the Plan area. • Over 3,800 allotment plots are located within the city. <p>Bristol has 33 conservation areas, and a large quantity of designated heritage assets and character areas.</p> <p>Development of the city's brownfield and greenfield land poses some sustainability issues related to impacts on such sites, valued landscapes and designated assets. However, if this is undertaken in absence of a plan, effects may be more severe, uncoordinated and potentially result in loss of valuable habitats and species.</p> |
| Transport and movement | | | <p>Transport linked CO2 emissions are projected to increase by a further 22% across the West of England region by 2036 if action is not taken to address these at a regional and local level³⁰.</p> |

³⁰ West of England Combined Authority, Joint Local Transport Plan 4 2020-2036

| SEA Topic | Current situation | Likely future without Plan | Key sustainability issues |
|---------------------------|-------------------|----------------------------|--|
| | | | Whilst 19% of all journeys in Bristol are by public transport and there has been an increase in cycling, without a plan to coordinate the location of growth with planned infrastructure improvements the ability to directly reduce strategic transport emissions will be more challenging. |
| Climate, energy and waste | | | <p>Whilst CO2 emissions have decreased by 33% since 2005 and per capita emissions have reduced by 45%, Bristol's current carbon emission projections would not meet carbon neutral targets by 2030.³¹</p> <p>In addition, no rivers in Bristol currently achieve 'Good Ecological Status' against the WFD due to impacts from flood protection / land drainage schemes and development. A large proportion of the city centre is at risk of flooding from the River Avon and the River Severn (particularly at Avonmouth).</p> <p>As set out under health and inequalities above, air pollution exceeds legal limits for NO2 and PM10 in parts of the city defined as Air quality Management Areas (AQMAS), which has adverse health implications and increased deaths.</p> <p>Without the plan, the ability to meet the emissions targets may be challenging or indeed not possible as planning policy is currently the only tool for the delivery of renewable energy technology, climate adaptability and sustainable design (e.g. SuDs) in new development. The Local Plan can provide further support in the long-term approach to climate change mitigation and adaption and setting aspirational energy efficiency targets for new development. However, there are potential risks associated with development within flood zones within the city.</p> |

3.7 Summary of SA Framework and Baseline Update

- The purpose of this SA Report is to provide an initial assessment of the extent to which proposed policies within the emerging draft Plan, when judged against reasonable alternatives, will help achieve relevant environmental, economic and social sustainability objectives or have effects.
- Given the time that has elapsed since the Scoping Report was issued in February 2018 and the change in strategic context with the withdrawal of the Joint Spatial Plan (JSP), it was considered necessary to review and update the Baseline and SA Framework presented in the Scoping Report to ensure that it remains relevant (see **Appendix 1**). The purpose of this was to develop a proportionate update to the baseline 'current situation' of sustainability issues and revised SA Framework to appraise the emerging policies against (see Table 6).
- In relation to the SA Framework, good practice guidance considers that potential effects need to be quantified where possible (see **Appendix 2** 'Criteria uses for assessing sites and AGRs'), or a judgement made against the baseline 'current situation' where this was not achievable. Effects have therefore been assessed using judgements given the availability of information.

³¹ Bristol One City (2020) One City Climate Strategy

4. Testing the Local Plan Publication Version Objectives against the Sustainability Appraisal Framework (Stage B1)

4.1 Overview

The Bristol Local Plan Pre-Submission Publication Version (November 2023) sets out the new vision for the plan period to 2040 and revised Local Plan aims (when compared to the Draft Local Plan March 2019 Consultation version).

The Local Plan Publication Version sets out the new spatial strategy for development in Bristol up to 2040. This revised vision, rationale and aims have helped to inform the development of new plan policies and identify new site allocations. As such, in accordance with best practice and PPG guidance³², there is a need to assess the compatibility of the Local Plan Publication Version objectives with the SA Objectives.

4.2 Establishing the approach to testing Local Plan Publication Version Objectives

To minimise duplication and ensure a proportionate assessment, the main elements from the vision for the Local Plan Publication Version have been condensed against the Local Plan Objectives in Table 7. This is considered appropriate because the vision has been influenced by the rationale for review, and has in turn, informed the Local Plan aims and objectives.

Bristol Local Plan Pre-Submission Publication Version vision (November 2023)

By 2025... the new local plan will be in place... 2,000 homes a year will be being built across the city. There is a focus on affordable homes – that means council housing, housing association homes and other forms of tenure which put homes in reach of people who can't access market housing. Regeneration and development will be happening across the city with regeneration plans extending to more areas and sites.

By 20230... a further 20,000 new and affordable homes will have been built since 2020 and the city will be reaching a population of 500,000 people within a growing region. Bristol will have met its zero carbon reduction targets.

By 2040... at least 34,700 new homes, served by new transport services, will have been completed across the city since the plan period began. New communities and neighbourhoods will have been created across the city. Urban living approaches will have seen areas sustainably grow with new homes, workspace and mixed uses. Bristol will be a resilient city able to respond to the challenges looking ahead to the middle of the 21st century.

Looking ahead to 2050... a city of 550,000+ people in inclusive communities, served by a rapid transit network which connects neighbourhoods in Bristol and the wider region. The city will have world class digital connectivity and will be taking the lead in the technological innovations of that time.

³² Paragraph: 013 Reference ID: 11-013-20140306 Stage B.1

Table 7 Condensing Vision and Plan Objectives and Aims

| Plan Objectives: Emerging from the Local Plan Objectives and Local Plan Aims | | | Reflected in the vision |
|---|-----------|--|--------------------------------|
| Local Plan Objectives | 1 | Setting out an approach to inclusive and sustainable growth and development, addressing the needs of everyone in all parts of the city. | Reflected |
| | 2 | Enabling of delivery of at least 1,925 new homes a year in Bristol up to 2040 including affordable housing and homes to meet a range of needs. | Strongly reflected |
| | 3 | Aiming to exceed our housing target where new infrastructure can unlock additional potential. | Strongly reflected |
| | 4 | Tackling the climate and ecological emergencies as we meet our needs for sustainable development. | Reflected |
| Local Plan Aims | 5 | Establish a planning approach which sees development of new and affordable homes as a core objective in development decisions, significantly increasing the number of new and affordable homes. | Strongly reflected |
| | 6 | Actively respond to the climate and ecological emergencies whilst securing sustainable development. | Reflected |
| | 7 | Enable the sustainable growth of our economy for everyone, with modern workplaces and digital infrastructure fit for the future. | Strongly reflected |
| | 8 | Promote urban living across the city with a focus on brownfield land – encouraging developments of homes with urban character, form and design in well-designed, connected, healthy and accessible neighbourhoods which achieve a liveable environment. | Strongly reflected |
| | 9 | Secure diverse and vibrant centres across the city which help to deliver the goal of a ‘15-minute city’. | Reflected |
| | 10 | Take a plan-led approach to promoting areas with the potential to increase densities and make efficient use of under-used land; this includes transforming some areas of the city to create communities with new homes, workplaces and public open spaces. | Strongly reflected |
| | 11 | Allocate new sites for housing and mixed-use development and highlight sites with potential for housing development and ensure that the best use is made of existing development allocations | Reflected |
| | 12 | Encourage innovation in the design, construction, and location of diverse housing solutions; diversify the housing offer, promoting new building types and tenures such as build for rent, housing for older people and self-build and community-led housing | Reflected |
| | 13 | Manage the development of student housing to safeguard existing communities whilst supporting thriving universities by meeting student accommodation needs | Reflected |
| | 14 | Protect our valued open spaces, promote food growing and increase the tree canopy to support a liveable, healthy city | Reflected |
| | 15 | Cherish the city’s historic environment and harness the benefits of heritage sensitive regeneration | Reflected |
| | 16 | Make sure new buildings protect the environment, achieving carbon net zero development at the earliest opportunity and adapting to the likely impact of climate change | Strongly reflected |

| | | | |
|--|-----------|--|-----------|
| | 17 | Tackle the challenges of air quality, health inequality and safeguarding environmental quality | Reflected |
|--|-----------|--|-----------|

Table 8 below tests the Local Plan vision, objectives and aims against the SA Framework Objectives. The purpose of this stage is to identify synergies or compatibility; where there are incompatibility or inconsistencies, it is for plan-makers to decide on priorities. The assessment is made using the criteria set out in Table 9 below.

Table 8 Testing the Local Plan vision, rationale for review and aims against the SA Framework Objectives

| SEA Theme | SA Framework Objective | New Local Plan objective | | | | New Local Plan aims | | | | | | | | | | | | |
|-------------------------------------|--|--------------------------|----|----|----|---------------------|----|----|-----|------|-----|----|----|----|----|-----|----|----|
| | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 |
| Population, Housing and Communities | 1.To ensure an adequate and diverse supply of housing that is affordable to everyone | + | ++ | ++ | 0 | ++ | ? | 0 | + | 0 | + | ++ | ++ | + | 0 | 0 | 0 | 0 |
| | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land | + | + | + | + | + | + | + | ++ | + | ++ | + | + | 0 | 0 | 0 | 0 | 0 |
| | 3. Ensure easy and affordable access to key services | + | 0 | + | 0 | 0 | 0 | 0 | + | ++/? | + | + | 0 | 0 | 0 | 0 | 0 | + |
| | 4. Increase participation in cultural and community activities | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ? | +/? | ? | ? | 0 | 0 | + | 0 | 0 | + |
| Health and Inequalities | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | ++ | + | ? | 0 | ? | 0 | ++ | ? | +/? | ? | ? | 0 | 0 | + | 0 | 0 | + |
| | 6. To reduce health inequalities and promote healthy lifestyles across the city | 0 | 0 | 0 | 0 | ? | 0 | 0 | +/? | +/? | +/? | 0 | 0 | 0 | ++ | 0 | 0 | ++ |
| | 7. Ensure access to education and learning for all sections of society | + | 0 | 0 | 0 | 0 | 0 | 0 | +/? | 0 | +/? | 0 | 0 | + | 0 | 0 | 0 | 0 |
| Economy and Employment | 8. To support the economy and ensure that there are suitable opportunities for employment | + | 0 | 0 | 0 | -/? | 0 | ++ | 0 | 0 | ? | + | 0 | + | 0 | 0 | 0 | 0 |
| | 9. Ensure access to a range of shopping facilities for all sections of society | + | 0 | + | 0 | -/? | 0 | 0 | ? | ++ | ? | + | 0 | + | 0 | 0 | 0 | 0 |
| Townscape and Landscape | 10. To ensure the conservation and enhancement of local character including important landscape features and the historic environment and its setting | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | ? | + | ++ | ++ | + |
| | 11. To ensure the conservation and enhancement of biological and geological assets and improve the quality of wildlife habitats | ? | ? | ? | ++ | ? | ++ | ? | ? | ? | ? | ? | ? | ? | ++ | + | ++ | + |
| | 12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation | ? | ? | ? | ++ | ? | ++ | ? | ? | ? | + | ? | ? | ? | ++ | + | + | ++ |
| Transport and Movement | 13. To encourage a demonstrable modal shift and reduce the need to travel | + | + | + | 0 | ? | 0 | + | + | ++ | + | + | 0 | 0 | 0 | 0 | 0 | + |
| | 14. To maintain and improve the existing highway network | + | 0 | + | 0 | 0 | 0 | ? | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Climate, Energy and Waste | 15. To reduce the risk of flooding from all sources | ? | ? | 0 | ++ | ? | ++ | ? | ? | 0 | ? | ? | ? | ? | + | 0 | + | + |
| | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | ? | ? | ? | ? | ? | ? | ? | ? | 0 | ? | ? | + | ? | + | 0 | + | + |
| | 17. Minimise air and noise pollution | ? | ? | ? | + | ? | + | ? | ? | + | ? | ? | ? | ? | + | 0 | + | ++ |
| | 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 | ? | ? | ? | ++ | ? | ++ | + | ? | 0 | ? | ? | ++ | 0 | + | -/? | ++ | + |

Table 9 Assessment Criteria for appraising compatibility of Local Plan Objectives against the SA Framework

| Compatibility of Local Plan Objective and SA Framework | Symbol |
|--|--------|
| Strongly compatible | ++ |
| Compatible | + |
| Neutral | 0 |
| Uncertain | ? |
| Potentially Incompatible | - |
| Strongly incompatible | -- |

4.3 Comments and recommendations for potential incompatibilities between Bristol Local Plan Pre-Submission Publication Version (November 2023) aims and objectives, and SA Objectives

Based on Table 8 there are small number of potential conflicts, either incompatibilities or uncertainties. These include:

- **Local Plan Aim 5 and SA Objectives 8- 9:** There is potential conflict between the drive for housing as 'core objective' in development decisions (New Local Plan Aim 5) and delivery of high-quality employment land to support economic growth, which is the primary purpose of SA Objective 8. This is also the case for SA Objective 9, where a possible conflict may arise in the ability to deliver a range of retail facilities for all sections of society.

Recommendation: The priority for housing is reflected within other Local Plan Aims 2, 3, 8, 11 and 12. Whilst the use of retail and employment land for homes in areas of high housing demand is largely supported by national policy, it is necessary to test the effects of this prioritisation on other land uses through the SA process (see Section 5).

- **Local Plan Aims 1-6, 9, 10 and SA Objectives 10-12:** With the exception of Local Plan aims 14 and 15, there is 'unknown' compatibility as the 'core objective' of delivering homes and enabling the growth of the economy for everyone could result in a lower prioritisation of these features.

Recommendation: The impact of delivering homes and enabling growth of the economy will require specific and careful consideration of the effect of development on these features. This is considered further within the assessment of Total Plan Effects.

- **Local Plan Aim 5 and Local Plan Aim 14, 17:** By seeking to establish an approach which sees development of new and affordable homes as a core objective in development decisions, Aim 5 has potential incompatibility with Local Plan Aim 14, 'Protect our valued open spaces, promote food growing and increase the tree canopy to support a liveable, healthy', and Local Plan Aim 17 'Tackle the challenges of air quality, health inequality and safeguarding environmental quality'. Although there is a strong focus on the use of brownfield land, there may be instances where it is not possible to achieve a significant increase in the number of new homes and protect all valued open spaces.

Recommendation: The impact of delivering homes will require specific and careful consideration of the effect of development on these features. This is considered further within the assessment of Total Plan Effects.

5. Developing the Local Plan Options including the Strategic Reasonable Alternatives (Stage B2)

Overview

The following section of this SA seeks to identify, describe and evaluate strategic reasonable alternatives for implementing the Local Plan³³. This updates the strategic reasonable alternatives detailed within the Interim SA Report.

The overarching purpose of exploring reasonable alternatives is to identify if there are different strategy or policy options for addressing or reducing negative effects on relevant economic, social and environmental SA Objectives and Local Plan objectives³⁴, when considered against the likely 'current situation' if the Local Plan were not to be adopted³⁵. Where any significant adverse impacts are unavoidable through alternative options, suitable mitigations measures are proposed³⁶.

In accordance with the PPG³⁷ and good practice, commentary on assessment at this stage aims to:

- Outline the reasons for selecting alternatives;
- Identify and describe the likely significant effects of the alternative on the environmental, economic and social factors using the evidence base, and the main differences with other alternatives³⁸. The criteria for determining the significance of effects have been set out in Section 3³⁹. As part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them; and
- Evaluate options to conclude the preferred option and the reasons the rejected options are not being taken forward.
- Any assumptions used in assessing the significance of the effects of the plan are documented, alongside difficulties encountered in compiling the required information.

In preparing these reasonable alternatives, the following guidelines are noted:

- Reasonable alternatives must take into account the objectives and the geographical scope of the plan or programme⁴⁰. It may be possible to disregard some alternatives from further consideration, for example because of a need to conform with national planning policy, or for operational reasons, however, reasons should be documented for eliminating these⁴¹.

³³ Article 5(1) and Annex 1 of SEA Environment Assessment of Plans and Programmes Directive (Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment)

³⁴ NPPF 2019, Paragraph 32.

³⁵ Planning Practice Guidance, Paragraph: 018 Reference ID: 11-018-20140306

³⁶ NPPF 2019, Paragraph 32.

³⁷ Paragraph: 018 Reference ID: 11-018-20140306

³⁸ Article 5 (1) and Annex 1(b)

³⁹ In accordance with Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004

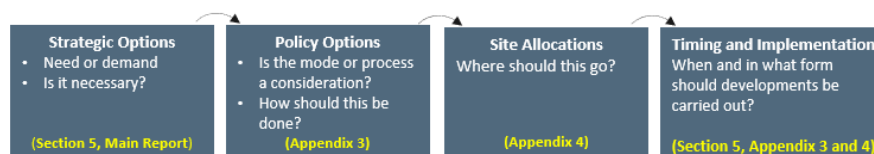
⁴⁰ Article 5(1) and Annex 1 of SEA Environment Assessment of Plans and Programmes Directive

⁴¹ Sustainability Appraisal of Local Development Documents (2005)

- There are instances where certain matters of the Plan are more appropriately assessed at different planning tier⁴² and duplication should be avoided⁴³. For example, specific relevant Supplementary Planning Documents (SPDs), Neighbourhood Plans and previously adopted Development Plan Documents (DPDs) have already been tested through the SA process, and are therefore not reappraised here. This also applies to retained policies and sites within adopted Development Plan Documents, which are either not subject to revision or for which minor edits result in no material change in appraisal of effects. Likewise, elements which were previously guided by the JSP are now brought 'back into' the appraisal process of the Local Plan.
- The identification of reasonable alternatives is focussed on a broad and proportionate approach against the SA objectives⁴⁴. It is not necessary to detail every possible alternative nor elaborate alternatives in extensive detail; only reasonable, viable and sufficiently distinct alternatives need to be put forward⁴⁵.
- Often there may be no other alternatives to an approach which are both realistic and fulfil both the SA Framework and Plan Objectives⁴⁶. However, given the duty under the Act on those preparing Local Plan documents to contribute to sustainable development, it is essential for the plan to set out to improve on the situation which would exist if there was no plan (i.e. 'policy off' or 'Business as Usual').
- Where possible, a hierarchy of alternatives has been considered: that is, whether there is an explicit need for the policy intervention; whether another approach would be possible; and whether location or timing is a consideration⁴⁷.
- In instances where credible and appropriate suggestions have been made, consultation responses have supported the generation of reasonable alternatives⁴⁸. Alternative options raised through consultation responses, which are otherwise not considered 'reasonable', are appraised as 'assessed scenarios'.
- Each alternative option has been assessed to the same level of detail⁴⁹ so that meaningful comparisons can be made.

In accordance with the SEA Guidance from 2005, a hierarchy process is followed for identifying reasonable alternatives. The following sections of the Interim Report are structured as follows:

Figure 4 Hierarchy of Alternatives



⁴² Regulation 12 (Part 3) of Environmental Assessment of Plans and Programmes Regulations 2004

⁴³ Article 4 of the SEA Environment Assessment of Plans and Programmes Directive (Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment)

⁴⁴ NPPF 2019, Paragraph 31.

⁴⁵ A Practical Guide to the SEA Directive (OPDM, 2005)

⁴⁶ 5.13 of the Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment

⁴⁷ A Practical Guide to the SEA Directive (OPDM, 2005)

⁴⁸ A Practical Guide to the SEA Directive (OPDM, 2005)

⁴⁹ Planning Practice Guidance, Paragraph: 018 Reference ID: 11-018-20140306

5.1 Developing Strategic Options for the Local Plan Strategy

Overview

The following section seeks to set out the options for the Local Plan strategy; in essence, alternatives to the assessment of 'need or demand'. The rationale for the Plan, and the strategic context within which the Plan is set, are both fundamentally important to identifying realistic reasonable alternatives.

Strategic Context for Reasonable Alternatives and the Local Plan

The identification and development of Strategic Reasonable Alternatives within the Interim SA Report (2019) were overwhelmingly guided by the Joint Spatial Plan (JSP). As of March 2019, the Bristol Local Plan Review Draft Policies and Development Allocations did not propose to change all of its current policies and indeed, the Local Plan was largely being updated through a 'Review' to ensure conformity with the JSP strategy. At the time, this strategy mandated for how housing need in the wider Bristol and Bath housing market area should be met over the period to 2036. For Bristol, this originally set out the following requirements for which detailed delivery would need to be established within the Local Plan Review:

- A housing requirement of 33,500 new and affordable homes to be delivered by 2036 across Bristol.
- The allocation of a Strategic Development Location (SDL) in the Green Belt at Bath Road, Brislington. It was for the Local Plan Review to identify development boundaries for each SDL.
- A target of 24,500 net new affordable dwellings across the West of England. To achieve this, JSP policies required developments delivering 5 or more dwellings or on sites larger than 0.2ha, will be required to deliver a minimum of 35% affordable housing.
- Development in key strategic employment locations to ensure continued economic growth and enable the delivery of 82,500 additional jobs in the West of England between 2016 and 2036. In Bristol, these locations included: Bristol City Centre, the Temple Quarter Enterprise Zone (TQEZ) and Avonmouth Severnside Enterprise Area (ASEA). The overall strategy was to focus growth in city centres and enterprise zones as sustainable and successful business locations. The Bristol Port was identified as a strategic infrastructure employment location.

On 7 April 2020, the West of England JSP was withdrawn from the examination process, following initial concerns raised by Inspectors in September 2019. However, under the Combined Authority (Spatial Development Strategy) Regulations 2018, the West of England Combined Authority is mandated to prepare a Spatial Development Strategy (SDS) which establishes a reasoned justification for spatial development in the combined authority area and general policies. As set out in Section 3, work on the SDS was halted in May 2022 and is no longer being progressed. The strategic planning context for Bristol's Local Plan will be now established through a process of cooperation with neighbouring councils, and this now forms the basis for the assessment of strategic reasonable alternatives.

5.1.1 Strategic Options: Reasonable Alternatives for Housing Need

Stage 1: Outline of the policies, main objectives and relationship with other relevant plans and programmes

From the SA Scoping Report, key sustainability issues relate to the following:

- Bristol has a growing population, above that of the national average, which is leading to high demand for new housing however there is limited housing supply.
- Access to the property market has become unattainable for many due to worsening affordability.
- The impact of increasing population densities has been most acutely felt within the central areas of Bristol – which, alongside a large and growing student population, there is potential to create further competition within available housing stock.
- Bristol has the third highest figure of households placed in temporary accommodation out of the Core Cities and this number has almost doubled from 2020 to 2023, to 1,188⁵⁰.
- There were 58 street homeless people reported to the 2022 Autumn National Rough Sleep Street count, although this was slightly down on those reported in 2021.

National planning policy requires Council's to significantly boost the supply of homes⁵¹. To do this, strategic policies should provide a clear approach for bringing sufficient land forward, and at a sufficient rate to address objectively assessed needs over the Plan Period in line with the presumption in favour of sustainable development⁵². Paragraph 11 of the NPPF (2023) requires strategic policies to, as a minimum, provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within neighbouring areas. These policies should be informed by a local housing need assessment, conducted using the standard method set out in national planning guidance⁵³.

The Local Plan Objectives aim to deliver 1,926 homes a year up to 2040, including affordable housing and homes to meet a range of needs, whilst aiming to exceed this target when new infrastructure can unlock additional potential. The first Local Plan Aim is to establish a planning approach which sees development of new and affordable homes as a core objective in development decisions with the aim of significantly increasing the number of new and affordable homes.

Stage 2: Identify and describe realistic alternatives

No alternatives were presented within the March 2019 Consultation Draft plan, nor the Further Sites Consultation (November 2022). This was because reasonable alternatives for housing quantum were intrinsically linked to the content of the JSP and SDS; with the current March 2019 Consultation Draft of the Local Plan Review aiming to meet and exceed the target set by the Joint Spatial Plan. It is also because as a largely urban area, with an emphasis on redevelopment of previously developed land and where there are few undeveloped sites, there are fewer genuinely reasonable alternatives than may be available elsewhere. However as there has been a fundamental and material change in

⁵⁰ Bristol City Council (2023) JSNA Health and Wellbeing Profile 2023/24: Homelessness Prevention Services.

⁵¹ Paragraph 60, NPPF (2023)

⁵² Paragraph 23, NPPF (2019)

⁵³ Paragraph 61, NPPF (2019)

circumstances⁵⁴, it is necessary to re-consider whether there are reasonable alternatives to the Plan Strategy.

It should be noted that it is not the purpose of the SA to generate reasonable alternatives. Appraisal of reasonable alternatives has therefore been determined from national policy and / or credible and appropriate consultation responses⁵⁵. Alternative options raised through consultation responses, which are otherwise not considered 'reasonable', are appraised as 'assessed scenarios'. These include alternative options which may initially present as alternatives to the Plan Strategy, however, which on detailed review do not achieve the Plan Objectives⁵⁶ or which are not considered to be genuinely credible options⁵⁷.

The two strategic reasonable alternatives considered, and the two assessed scenarios considered are set out as follows:

- Option 1: Achieve an annual average minimum of 1,925 homes per year by 2040.
- Option 2: Achieve an annual average minimum of 1,925 homes per year by 2040, and exceed where this is supported by service and infrastructure capacity. (i.e. Policy H1).
- Assessed Scenario 1: Meet Annual Local Housing Need (approx. 2,500 dwellings).
- Assessed Scenario 2: Government's Standard Method calculation (approx. 3,380 dwellings).

The implications in terms of distribution of need across the city are considered within Stage 5.1.2.

Option 1: Achieve an annual average minimum of 1,925 homes per year by 2040

The Bristol Local Housing Needs Assessment (August 2023) identified as a baseline requirement for housing need, using the most recent official housing projections as a rate of growth, of 31,300 dwellings (1,565 per year) (termed 'Scenario 1' within the ORS Local Housing Needs Assessment). This was considered to be sufficient to enable current demographic trends to continue.

Using the Standard Method (excluding the 35% urban uplift applied to the 20 authorities which contain the largest proportion of the city or urban centre's population) (termed 'Scenario 2' within the ORS Local Housing Needs Assessment), results in a housing need of 50,100 dwellings (equivalent to 2,503 per year across a 20 year period). This is needed to provide for future household growth and address past housing under-delivery. Where this option cannot be accommodated within the Bristol, this must be addressed under the Duty to Cooperate and met elsewhere within the Housing Market Area.

The annual average minimum of 1,925 homes per year proposed therefore utilises the 2,503 homes per year as a 'starting point'. Paragraph 61 of the NPPF (2023) indicates that exceptional circumstances may justify an alternative approach to the Local Housing Needs Assessment which reflects current and future demographic trends and market signals. Therefore, as set out within the

⁵⁴ Aireborough Neighbourhood Development Forum v Leeds City Council and others [2020] EWHC 1461 (Admin) and Save Historic Newmarket v Forest Heath DC [2011] EWHC 1078 (Admin)

⁵⁵ A Practical Guide to the SEA Directive (OPDM, 2005)

⁵⁶ R (Friends of the Earth) v. Forest of Dean D.C. [2015] and R (RLT Built Environment Ltd) v. Cornwall Council [2017]

⁵⁷ Examination of the St Albans City And District Local Plan (14 April 2020)

Future Consultation (November 2022), past delivery rates do form a useful benchmark as to whether housing need estimates will be realistically deliverable in future. In a 20-year period, 2,000 completions per year was exceeded on more than 7 occasions in Bristol and past delivery rates indicate that the Core Strategy figure will be met and surpassed by the end of the adopted plan period. This is considered to be encouraging context for future housing delivery which is supported by a high level of extant planning permissions.

The future capacity for new homes in Bristol is therefore based on the availability of appropriate development sites and whether those sites are deliverable. In Bristol there are a number of sources for development sites capacity. The housing target of 1,925 homes per year is therefore based on the following elements of supply which amount to 34,700 homes within the plan period.

- Extant planning permissions (6,250 homes);
- Retained Core Strategy and Site Allocations Development Management adopted site allocations (2,300 homes);
- Proposed Site Allocations (Policy DA1, which is appraised within Appendix 4) (2,000 homes);
- Urban potential, previously termed as 'Urban Living' capacity (Policy UL1 and UL2) (2,500 homes);
- Small site windfalls, of between 1-9 homes that are likely to occur as a result of market forces (4,500 homes);
- Estimated capacity from 10 Areas of Growth and Regeneration (Policy DS1 – DS9, DS13 and DS14, which is appraised within Appendix 3) (approximately 16,000 homes); and,
- Greenfield sites arising from Green Belt boundary changes within the south west Bristol Green Belt (Policy DS10 -11), and south east Bristol Green Belt (Policy DS12) (amounting to 1,150 homes in total – excluding Yew Tree Farm).

| Reasonable Alternative | Yes |
|------------------------|---|
| Rationale | <p>Based on the ORS Local Housing Needs Assessment Scenario 2 Standard Methodology (excluding the Urban Uplift) alongside the assessment of supply published within the Further Consultation (November 2022), it is considered that this option represents a realistic reasonable alternative. This would be supported by an affordable housing policy, with the ORS Local Housing Needs Assessment considering that around 35% of the total housing requirement should be Affordable Housing (Figure 64).</p> <p>The unmet portion of housing need (i.e. 2,503 – 1,925 per year) is required to be met through the statutory requirements of the Duty to Cooperate within the Local Housing Market Area. It should be noted that the assessment of effects does not consider how or where this unmet need would be accommodated.</p> |

Option 2 Achieve an annual average minimum of 1,925 homes per year by 2040, and exceed where this is supported by service and infrastructure capacity. (i.e. Policy H1).

This second option (ultimately, Pre-Submission Publication Version Policy H1) would require land capacity to be maximised from suitable sites across the City. There is no overall cap on this housing target; this will be achieved by offering a large range of potential development sites, maximising delivery from areas of growth and regeneration and a variety of policy interventions. The housing target will be exceeded where it is supported by service and infrastructure capacity.

By building on the existing sources of supply set out within Option 1, and establishing a planning approach which sees the development of new and affordable homes as a primary objective in development decisions, this housing target relies on the following elements:

- Optimising densities and using coordinated and comprehensive approaches to development within the Areas of Growth and Regeneration and other locations (including Policy DS1A Bristol City Centre Broadmead Castle Park and the Old City) to deliver around 20,000 new homes. This also notes that the Urban Potential Assessment (2018) identified there may be potential for new homes in other locations that were not surveyed in detail.
- Preventing the loss of residential accommodation (Policy H2); and
- Managing the development of student housing to safeguard existing communities and support delivery of new homes (Policy H7).

This option could therefore result in an additional 5,870 units being included to contribute towards the housing target (amounting to approximately 2,250 dwellings per year). This demonstrates the challenge of meeting Scenario 2 within the ORS Local Housing Need Assessment, however housing numbers are largely uncertain as these will be reliant on service and infrastructure capacity.

| Reasonable Alternative | Yes |
|------------------------|---|
| Rationale | <p>This reasonable alternative is based on the need to determine a minimum number of homes⁵⁸. Capacity is maximised ensuring a sufficient amount and variety of land can come forward, and by assuming sites that are suitable for development but where there may be less evidence of site availability. A range of mechanisms would be deployed to facilitate delivery of new homes which exceeds targets (see Policy UL1, UL2, H2, H4 and H7), including the inclusion of sites proposed by the Council's housing company Goram Homes. The overall ability to deliver the quantum of homes beyond 1,925 becomes uncertain given supply is based on maximising capacity of broad areas of growth and recent trends in delivery.</p> <p>The unmet portion of housing need (i.e. 2,503 – 1,925 per year) is required to be met through the statutory requirements of the Duty to Cooperate within the Local Housing Market Area. It should be noted that the assessment of effects does not consider how or where this unmet need would be accommodated.</p> |

Assessed Scenario 1: Meet Annual Local Housing Need (approximately 2,500 dwellings per year)

NPPF Paragraph 60 states that

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

The standard method in national planning guidance therefore sets out a formulaic approach to determine the minimum Local Housing Need (LHN) figure and prescribes the use of specific data for the calculation. This amounts to 2,503 homes per annum, totalling 50,100 homes over a 20-year period.

⁵⁸ Paragraph 11.

In determining the local plan housing target, it is necessary to consider whether, or not, the LHN could be met within the area, taking account of any constraints on land availability. Based on the assessment of ‘exceeding land supply’ set out for Option 2 above, it remains unclear how 2,500+ dwellings per year could be delivered across the City. As the ORS Local Housing Needs Assessment notes, land availability is a particularly relevant issue given that Bristol already extends up to, and beyond, the LPA boundary. Previously, both the West of England Joint Strategic Plan (JSP) and the West of England Combined Authority (WECA) Spatial Development Strategy (SDS) had planned to deliver a proportion of Bristol City’s housing needs across the wider area. Given this context, it seems unlikely that the Bristol Local Plan will be able to meet the identified housing needs in full.

It is noted that where an authority is unable to meet LHN in full, it is necessary to engage with neighbouring authorities through the Duty to Co-operate (DtC) discussions. This should establish if any of the identified housing need that isn’t able to be delivered locally (the “unmet need”) could be provided for in other areas.

| Reasonable Alternative | No |
|--|--|
| Rationale and Difficulties in Assessment | <p>Based on the assessment of land supply undertaken to inform Option 1 and 2, alongside past delivery rates (set out within the Further Consultation 2022 and detailed within the ORS Local Housing Needs Assessment), consistent delivery of 2,500 homes per year is likely to be unrealistic. Only on two occasions within the past 20 years was this housing target surpassed in terms of completions (2009 and 2022). The unmet portion of housing need (i.e. 2,503 – 1,925 per year) is therefore required to be met through the statutory requirements of the Duty to Cooperate within the Local Housing Market Area.</p> <p>Given sources of supply to meet this housing target are unknown, it is difficult to meaningfully and comprehensively assess the effects of this reasonable alternative. It is considered that this does not represent a realistic or credible option, and therefore a summary of the implications is set out below.</p> |
| Summary of Assessment of Effects | <p>Option 2 and Assessed Scenario 1 are not considered to be vastly different in the assessment of effects.</p> <p>As assessed under Option 2, Assessed Scenario 1 is likely to result in significant positive effects against SA Objective 1 due to its focus on increasing housing supply, however these effects would be unknown given that the sources of supply to ‘exceed’ the Plan housing target and deliver beyond are somewhat uncertain. Indeed, so is the types of housing that this Assessed Scenario would deliver. Similarly, Assessed Scenario 2 is therefore likely to result in indirect positive effects for SA Objectives 2 overall although these too would be uncertain given that sources of supply are unknown. Under this scenario, there is likely to be a higher potential for negative effects given that the increase in supply targets would likely place more pressure on greenfield / Green Belt land.</p> <p>It is likely that as housing delivery increases, there is more potential for negative unknown effects on SA Objectives 10, 11, 12 and 17 similar to the assessment made for Option 2. Increased requirements for housing delivery could start to place significant pressure on historic townscape and urban landscape of the City Centre as well as green spaces, wildlife and green and blue infrastructure as these assets may start to become ‘squeezed out’. Effects on SA Objectives 13 arising from Assessed Scenario 1 are considered to be minor negative, but unknown. Whilst increased housing delivery could result in increased optimisation of densities resulting in a reduced need to travel, the likely need for discussion with</p> |

| | |
|--|---|
| | <p>neighbouring authorities to meet "unmet need" in this Assessed Scenario could result in an increased need to travel depending on where this "unmet need" was accommodated. For similar reasons, SA objective 14 is considered to result in unknown effects arising from Assessed Scenario 1.</p> <p>Increased housing delivery is likely to put further pressure on areas of the city already effected by flood risk and / or air pollution, and as such negative but unknown effects are likely in relation to SA Objectives 16 and 17.</p> |
|--|---|

Assessed Scenario 2: Government's Standard Method calculation with urban uplift (approximately 3,380 dwellings per year)

In December 2020 and since the Draft Local Plan March 2019 Consultation version, the Government introduced a new element of the standard method for local housing need for the largest cities and urban centres within the England. This resulted in the application of a 'cities and urban centres uplift' of 35% to the capped need figure to 20 areas in England, of which Bristol was one of these. In 2020, this increased Bristol's LHN to approximately 3,300 homes per year from the adopted Core Strategy target, fourth highest only to Birmingham, Manchester and Leeds (excluding London).

The Planning Practice Guidance indicates that it is expected that this uplift must be applied to the cities and urban centres themselves, rather than the surrounding areas⁵⁹. It is expected that brownfield and other under-utilised urban sites should be prioritised and on these sites density should be optimised to promote the most efficient use of land. This is so as to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable.

Application of the 35% uplift to the standard method indicates a need of 3,376 homes per year. It is accepted in the ORS Local Housing Needs Assessment (2023) that this appears inconsistent with other indicators of need within City. It also considerably exceeds the city's estimated capacity to deliver these additional homes and 20-year trends in completions set out in the Further Sites Consultation Appendix 1 Bristol's Housing Need and Requirement.

| Reasonable Alternative | No |
|------------------------|---|
| Rationale | <p>Based on the assessment of land supply undertaken to inform Option 1 and 2, alongside past delivery rates (set out within the Further Consultation 2022 and detailed within the ORS Local Housing Needs Assessment), consistent delivery of 3,380 homes per year will be unrealistic. Only on two occasions within the past 20 years was a housing target of 2,500 homes per year surpassed in terms of completions (2009 and 2022). The unmet portion of housing need (i.e. 3,380 – 1,925 per year) is therefore required to be met through the statutory requirements of the Duty to Cooperate within the Local Housing Market Area.</p> <p>Given sources of supply to meet this housing target are unknown, it is difficult to meaningfully and comprehensively assess the effects of this option as a reasonable alternative. It is considered that this does not represent a realistic or credible reasonable alternative, and therefore a summary of the implications of this option is set out below.</p> |

⁵⁹ Paragraph: 035 Reference ID: 2a-035-20201216

| | |
|----------------------------------|--|
| Summary of Assessment of Effects | <p>Option 2 and Assessed Scenario 1 and 2 are not considered to be vastly different in the assessment of effects. Indeed, the effects are likely to be even more amplified and uncertain for Assessed Scenario 2.</p> <p>Given the level of housing delivery under Assessed Scenario 2, it is likely that this would result in significant positive effects against SA Objective 1. This effect would be increasingly uncertain given that the sources of supply to meet this target are unknown. Similarly, for this reason effects are uncertain in relation to SA Objectives 5 -9 given it is expected that there would be limited emphasis on other uses under this scenario. The level of housing delivery required under Assessed Scenario 2 is likely to place even more pressure on greenfield and / or Green Belt land and therefore there is higher potential for negative effects to arise under SA Objective 2. The focus on housing delivery under Assessed Scenario 2 is likely to result in negative effects on SA Policy 8 given that the level of housing need required could compromise the delivery of employment spaces, although effects would be unknown.</p> <p>In addition effects on SA Objectives 11, 12 and 17 are unknown, however as described above there is considered to be potential for negative effects to be amplified under Assessed Scenario 2 (compared to Option 2 and Assessed Scenario 2) particularly given that it is unknown how or where these housing targets would be delivered and increased . There is increased potential for negative effects to arise against SA Objective 13 for the same reasons as described under Assessed Scenario 2. As reported under Assessed Scenario 1, increased housing delivery is likely to put further pressure on areas of the city already affected by flood risk and/or air pollution as such negative but unknown effects are likely in relation to SA Objectives 16 and 17.</p> |
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Stage 3 Assessment and evaluation of effects

Stage 3.1 Consideration of technical and other difficulties in the identification / assessment of alternatives

- No alternatives were presented within the March 2019 Consultation Draft plan nor the Further Sites Consultation 2022. This was because reasonable alternatives for housing quantum were intrinsically linked to the content of the JSP and SDS; with the current March 2019 Consultation Draft of the Local Plan Review aiming to meet and exceed the target set by the Joint Spatial Plan. It is also because as a largely urban area, with an emphasis on redevelopment of previously developed land and where there are few undeveloped sites, there are fewer genuinely reasonable alternatives than may be available elsewhere.
- 'Exceeding' the housing target (Option 2, or Policy H1) is currently assessed based on offering a large range of potential development sites, areas of growth and regeneration and a variety of policy interventions. This figure will be exceeded, to an uncapped level, where it is supported by service and infrastructure capacity. At this stage of the Sustainability Appraisal, there is uncertainty regarding the specific impact of these sites on objectives within the framework on the basis that some sources of supply for 'exceeding' this target are unknown. The uncertainty in the effects of these alternatives, particularly in the long-term, is therefore reflected as a common theme throughout the following appraisals.
- Appraisals of the 'assessed scenarios' are limited in nature on the basis that these cannot be meaningfully and comprehensively appraised based on the evidence available.

Stage 3.2 Summary of assessment findings and Selected Approach

The assessment below explores the effects of the two reasonable alternatives against the SA Framework. Option 2, which is based on Policy H1 and exceeding the housing target of 1,925 homes per year by 2040, seeks to significantly boost the supply of housing through a range of policy interventions. When assessed against Objective 1, significant positive effects are therefore likely in the long-term.

Overall effects for Option 1 and 2 (Policy H1) are broadly similar for access to key services (Objective 3), access to education (Objective 7) and access to a range of shopping facilities (Objective 9). Whilst it is acknowledged that there are a number of sites which exist beyond acceptable walking distances from local centres and schools, generally increasing the number of homes within Bristol City Centre boundary is likely to result in a greater number of homes indirectly benefitting from better accessibility to services on offer within the City.

However, without an upper limit on the level of number of units, and by encouraging a planning approach which seeks new and affordable homes as a primary objective in development decisions, it may be that there is a point at which the effects are not exponentially positive, and that Option 2, Policy H1 itself results in pressure for achieving other plan objectives. It should be noted that this 'tipping point' is likely to occur earlier than described within the Interim SA Report (2019), on the basis that the baseline housing target is higher than that set out within the March 2019 Consultation Draft Plan.

For Objectives that seek to: enhance the historic environment (Objective 10); ensure protection of the biological / geological assets (Objective 11) and enhance green or blue infrastructure (Objective 12), uncapped numbers of homes may only have positive effects up to a point. However, this is likely to depend on the scale and location of development. Seeking to exceed the yearly delivery target without an overall cap on the number of units may result in changes to the historic townscape and urban landscape of the City Centre.

The same is true of employment objectives (Objective 8); whilst increasing the number of homes within close proximity to employment opportunities may support inclusive growth, this is also likely to result existing employment sites coming under pressure due to the focus on housing delivery, particularly under Option 2. Whilst this Option may therefore not result in a loss of jobs directly, by taking a planning approach which seeks development of new and affordable homes as the primary objective in development decisions, this is likely to reduce the level of available land for future employment development.

Maximising densities and potential of land within the City Centre boundary may also result in development coming forward in areas that are currently at risk from flooding in the short term. This effect is likely to be mitigated at a site level and by strategic infrastructure capacity improvements (identified under Policy FR2) however, the options themselves do not expressly direct development away from areas at risk from flooding or to areas supported by flood defence infrastructure, and are reliant on other non-strategic policies. Finally, in terms of other infrastructure capacity, effects are largely unknown under both Option 1 and Option 2. Whilst housing delivery in the Areas of Growth and Regeneration (generally in close proximity to existing services and served by public transport)

and maximising densities is likely to have positive effects on encouraging the uptake of sustainable travel choices, there remain elements of the capacity (e.g. windfall sites) which are unknown.

In summary, there is no significant difference in the assessment effects between Option 1 and Option 2 (Draft Policy H2). Whilst Option 2 could have significant benefits for the delivery of homes, there is likely to be a 'tipping point' in the medium term by which uncapped levels of homes do not result in exponentially beneficial outcomes, particularly in relation to historic environment, green space and employment land. For this reason, there is more potential for negative effects to arise under Option 2. Conversely, whilst Option 1 would not result in significant beneficial effects, effects against other objectives within the Framework are generally unknown at this stage.

Mitigating effects of Option 2 could be to explore a 'cap' and to provide additional evidence that the proposed levels of housing growth will not result in negative or significant effects for Objectives 8, 10, 11 and 12.

Table 10 Assessment of Strategic Alternatives for Housing Need (Option 1 Achieve an annual average minimum of 1,925 homes per year by 2040 or Option 2 Achieve an annual average minimum of 1,925 homes per year by 2040, and exceed where this is supported by service and infrastructure capacity (i.e. Policy H1)

| SEA Theme | SA Framework Objective | D-M Criteria | Option 1 - Achieve an annual average minimum of 1,925 homes per year by 2040 | | | | | | | | Option 2 - Achieve an annual average minimum of 1,925 homes per year by 2040, and exceed where this is supported by service and infrastructure capacity (Policy H1) | | | | | | | |
|-------------------------------------|---|---|--|------|------|----------------------------|--------------------------------|-----------------------------|---|--|---|------|------|----------------------------|--------------------------------|-----------------------------|---|--|
| | | | Assessment of Significance of Effect (0/+/-/?) | | | Direct (D) or Indirect (I) | Temporary (T) or Permanent (P) | Spatial Scale of Effect | Receptors (R) and/or affected groups (AGs) | Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB) | Assessment of Significance of Effect (0/+/-/?) | | | Direct (D) or Indirect (I) | Temporary (T) or Permanent (P) | Spatial Scale of Effect | Receptors (R) and/or affected groups (AGs) | Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB) |
| | | | Short | Med | Long | | | | | | Short | Med | Long | | | | | |
| Population, Housing and Communities | 1.To ensure an adequate and diverse supply of housing that is affordable to everyone | DMC1 DMC2 DMC3 DMC4 | ++/? | ++/? | ++/? | Both | P | City-wide and transboundary | R: Local Housing Market and Bristol's population. AG: Bristol's population and households. | n/a | ++/? | ++/? | ++/? | Both | P | City-wide and transboundary | R: Local Housing Market and Bristol's population. AG: Bristol's population and households. | n/a |
| | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land | DMC5 DMC6 DMC7 | +/? | +/? | +/? | Both | P | Local and City-wide | R: Various (urban and greenfield sites). AG: Bristol's population and households. | AM: Provide evidence that suitable brownfield sites is maximised and demonstrate brownfield land in the Green Belt has been pursued first. | +/? | +/? | +/? | Both | P | Local and City-wide | R: Various (urban and greenfield sites). AG: Bristol's population and households. | AM: Provide evidence that suitable brownfield sites is maximised and demonstrate brownfield land in the Green Belt has been pursued first. |
| | 3. Ensure easy and affordable access to key services | DMC8 | +/? | +/? | +/? | Indirect | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a | +/? | +/? | +/? | Indirect | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a |
| | 4. Increase participation in cultural and community activities | DMC9 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Health and Inequalities | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | DMC10 DMC11 | +/? | +/? | +/? | Direct | P | Local and City-wide | R: Bristol's population and household within deprived areas. AG: As above. | n/a | +/? | +/? | +/? | Direct | P | Local and City-wide | R: Bristol's population and household within deprived areas. AG: As above. | n/a |
| | 6. To reduce health inequalities and promote healthy lifestyles across the city | DMC12 DMC13 DMC14 | +/? | +/? | +/? | Indirect | P | Local and City-wide | R: Bristol's population and household within poor health areas. AG: As above. | n/a | +/? | ? | ? | Indirect | P | Local and City-wide | R: Bristol's population and household within poor health areas. AG: As above. | n/a |
| | 7. Ensure access to education and learning for all sections of society | DMC15 DMC16 | +/? | +/? | +/? | Indirect | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a | +/? | +/? | +/? | Indirect | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a |
| Economy and Employment | 8. To support the economy and ensure that there are suitable opportunities for employment | DMC17 DMC18 DMC19 DMC20 DMC21 | ? | ? | ? | Direct | P | Local and City-wide | R: Bristol's employees and employers. AG: As above, and Bristol businesses. | AM: Provide evidence to demonstrate that there will be no net loss of jobs through land identified through urban potential. | ? | -/? | -/? | Direct | P | Local and City-wide | R: Bristol's employees and employers. AG: As above, and Bristol businesses. | AM: Provide evidence to demonstrate that there will be no net loss of jobs through land identified through urban potential. |
| | 9. Ensure access to a range of shopping facilities for all sections of society | DMC22 DMC23 | +/? | +/? | +/? | Indirect | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a | +/? | +/? | +/? | Indirect | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a |
| Townscape and Landscape | 10. To ensure the protection and enhancement of the historic environment and its setting | DMC24 | ? | ? | ? | Both | P | Local and City-wide | R: Cultural heritage; historic environment. AG: Bristol's population. | n/a | ? | ? | -/? | Both | P | Local and City-wide | R: Cultural heritage; historic environment. AG: Bristol's population. | n/a |
| | 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats | DMC25 DMC26 | ? | ? | ? | Both | P | Local and City-wide | R: Local wildlife and biodiversity; natural environment. AG: Bristol's population; wildlife. | MB: Set out how Green Belt release can be offset through compensatory improvements. | ? | ? | -/? | Both | P | Local and City-wide | R: Local wildlife and biodiversity; natural environment. AG: Bristol's population; wildlife. | MB: Set out how Green Belt release can be offset through compensatory improvements. |
| | 12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation | DMC27 | ? | ? | ? | Both | P | Local and City-wide | As above. | MB: Set out how Green Belt release can be offset through compensatory improvements. | ? | ? | -/? | Both | P | Local and City-wide | As above. | MB: Set out how Green Belt release can be offset through compensatory improvements. |
| Transport and Movement | 13. To encourage a demonstrable modal shift and reduce the need to travel | DMC28 DMC29 | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol's population and natural environment. AG: Commuters and businesses. | AM: Provide detail on transport infrastructure interventions required to meet the target of 1,925 homes per year by 2040. | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol's population and natural environment. AG: Commuters and businesses. | AM: Provide detail on the transport infrastructure interventions critically needed to exceed the target of 1,925 homes per year by 2040. |
| | 14. To maintain and improve the existing highway network | DMC30 DMC31 | ? | ? | ? | Both | P | City-wide transboundary | R: Bristol's population and natural environment. | AM: Provide detail on transport infrastructure interventions required to meet | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol's population and natural environment. | AM: Provide detail on the transport infrastructure interventions critically needed |

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|---|--|---|-----|-----|-----|------|-----|-------------------------|---|---|---|-----|-----|------|-----|--------------------------|---|--|--|
| | | | | | | | | | AG: Commuters and businesses. | the target of 1,925 homes per year by 2040. | | | | | | | AG: Commuters and businesses. | to exceed the target of 1,925 homes per year by 2040. | |
| Climate, Energy and Waste | 15. To reduce the risk of flooding from all sources | DMC32 DMC33 | ? | ? | ? | Both | P | Local and City-wide | R: Natural environment (water); AG: Bristol's population; local wildlife. | n/a | ? | ? | -/? | Both | P | Local and City-wide | R: Natural environment (water); AG: Bristol's population; local wildlife. | AM: Setting out areas to benefit from future flood defence schemes and any required infrastructure interventions critically needed to exceed the target of 1,925 homes per year by 2040. | |
| | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | DMC34 DMC35 DMC36 DMC37 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | |
| | 17. Minimise air and noise pollution | DMC38 | ? | ? | ? | Both | P | City-wide transboundary | R: Bristol's population and natural environment. AG: Commuters and businesses. | AM: Provide detail on transport infrastructure interventions required to meet the target of 1,925 homes per year by 2040. | ? | ? | ? | Both | P | City-wide transbound ary | R: Bristol's population and natural environment. AG: Commuters and businesses. | AM: Provide detail on the transport infrastructure interventions critically needed to exceed the target of 1,925 homes per year by 2040. | |
| | 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 | DMC39 DMC40 DMC41 DMC42 | ? | ? | ? | Both | P | City-wide transboundary | R: Bristol's population and natural environment. AG: Commuters and businesses. | AM: Transport infrastructure interventions. | 0/? | 0/? | 0/? | Both | P | City-wide transbound ary | R: Bristol's population and natural environment. AG: Commuters and businesses. | AM: Provide detail on the transport infrastructure interventions critically needed to exceed the target of 1,925 homes per year by 2040. | |
| Reasonable Alternative Evaluation of Effects and Rank | | <p>Rank Score: This strategic reasonable alternative sets out a requirement to achieve an annual average minimum of 1,925 homes per year by 2040. This figure is based on the following sources of supply: the delivery of extant planning permissions, retained Core Strategy and Site Allocations and Development Management adopted site allocations, proposed site allocations within the Publication Version November 2023 Draft Local Plan, urban potential capacity, small windfall sites and the estimated capacity from the 10 Areas of Growth and Regeneration as presented within the Publication Version November 2023 Draft Local Plan.</p> <p>Scale of effects: As a strategic reasonable alternative related to the quantum of housing planned for, the scale of effects would have both city-wide and housing-market area effects. However, depending on sites identified as suitable to contribute towards the overall supply, effects may also be localised and site-specific.</p> <p>Socio-economic and environmental effects:</p> <ul style="list-style-type: none">This option would likely result in a significant positive effect in contributing towards a sufficient level of housing to meet needs within the City (SA Objective 1) however, as the sources of supply used to derive this figure include windfall sites, urban potential capacity and estimated capacity within Areas of Growth and Regeneration, all of which are uncertain in terms of delivery, it is partly unknown. Whilst the type of housing to be delivered is not prescribed, it is considered that the variety of supply inputs and supporting policies associated with urban living and maximising land use (Policies UL1 and UL2) would result in this option indirectly generating a range of different housing types.Housing supply is based in part on urban potential. Whilst this element of supply in isolation could generate a minor positive effect against SA Objective 2 achieving this target also includes delivery on greenfield sites and changes arising from Green Belt boundary changes in south west Bristol and therefore, effects of this option may also be negative against this Objective.Maximising urban potential and including capacity within the AGRS which are predominantly well-served by public transport or close to designated centres, is indirectly likely to increase the number of homes within easy and affordable access to key services and community facilities (SA Objective 3, DCM8; Objective 7, DCM16; Objective 9, DCM22 and DCM23). This alternative could increase the diversity and vitality of local retail centres by introducing more residential uses, which would likely increase footfall and vitality of retail centres. However, as not all new homes will be developed within these areas, effects are also considered to be uncertain.Whilst some sites for housing delivery will be located within areas of deprivation (SA Objective 5), and therefore offer potential opportunities for regeneration or investment in deprived areas, this is contingent on the suitability and availability of sites. The overall effect of this policy against this Objective (DMC11) is therefore partly uncertain.Lack of good quality housing, homelessness or a degraded urban environment can contribute to overall poor health. Increasing the number of homes could indirectly improve health and reduce health inequalities (Objective 6). This is supplemented by additional policies which focus on the overall quality of homes, better living conditions with private outdoor space and better maintained homes (Policies DPM1 and DC1) and through energy efficiency and thermal comfort policies (Policies NZC1-NZC5). In addition, a large proportion of site allocations are within AQMAs. Effects of this option are therefore in part unknown, and possibly negative.Alleviating housing pressure through a range of sites across the city can have a number of positive effects in supporting economic growth (SA Objective 8), through making the city a more attractive place to live and do business, improving access to employment and reducing unsustainable commuting patterns (DCM21) and increasing the skills and labour pool. Bringing forward small development sites can play a role in supporting smaller and medium-sized construction businesses. However, delivery of urban potential sites could result in a loss of employment space across Bristol and therefore overall effects have been assessed as unknown (DCM17, DCM18 and DCM19).Identifying urban potential, capacity from Areas of Growth and Regeneration and small site windfalls may have relatively localised impact on the historic environment. In some instances, this could be beneficial if previous built form had degraded the historic environment, however, it could be negative if the delivery of housing would effect the setting of heritage assets. The assessment of this effect is based on both the significance of the asset, and the overall ability to conserve and enhance the setting or character through implementation and as such effects have been assessed as unknown at this stage. Green Belt in the south west of the city was not considered to make a significant contribution to the historic character of a city, and therefore the effects are considered to be neutral in this regard.Proposed site allocations include land formerly designated as Important Open Space. Alongside Green Belt release, this could result in the loss of green spaces which are no longer considered to be ‘demonstrably special’ nor an ‘open spaces of public value’. However, development would be required to | | | | | | | | | <p>Rank Score: This strategic reasonable alternative sets out a requirement to achieve an annual average minimum of 1,925 homes per year by 2040, and exceed where this is supported by service and infrastructure capacity. This is consistent with Policy H1. The figure of 1,925 homes per year by 2040 comprises the same sources of supply as Option 1 but exceedance of this target relies on the following: service and infrastructure capacity being available and optimising densities and using coordinated and comprehensive approaches to development within the Areas of Growth and Regeneration, the addition of Policy DS1A and several new site allocations.</p> <p>Scale of effects: As a strategic reasonable alternative related to the quantum of housing planned for, the scale of effects would have both city-wide and housing-market areas effects. However, depending on sites identified as suitable to contribute towards the overall supply, effects may also be localised and site-specific.</p> <p>Social, economic and environmental effects: As this policy option seeks to exceed the housing requirement assessed within Option 1, effects of this Option are often similar with increased degrees of effect (both positive and negative). Overall there is greater uncertainty in relation to effects arising from Option 2 given that the housing target relies on service and infrastructure capacity. Differences in the scale of effect and particularly causes for such effects are set out below:</p> <ul style="list-style-type: none">As with Option 1, this option would likely result in a significant positive effect in contributing towards a sufficient level of housing to meet needs within the City (SA Objective 1), however similar to Option 1 the supply figure includes sites which are uncertain in terms of their delivery, location and capacity and therefore effects are also partly unknown. As with Option 1 this option does not exactly prescribe the type of housing to meet identified need, however given the diversity of sources of supply and policies to support a variety of types of homes, including for example student housing, it is considered that this option would indirectly generate a range of different housing types.For SA Objective 2 (DMC5 and DMC6), the assessment of effects is likely to be the same as Option 1. Green Belt release and greenfield development would also form part of this option, in the same way as Option 1 and therefore there remains uncertainty with regard to the extent to which this option will maintain the openness of Green Belt (DMC7).For SA Objective 3 (DM8), SA Objective 7 (DCM16) and SA Objective 9 (DCM22 and DCM23), the assessment of effect is likely to be similar to Option 1 in that this option will indirectly increase the number of homes within easy and affordable access to key services and community facilities. As exceeding the housing target is to be supported by access to appropriate services, the effect is considered to be more positive than Option 1, as the number of homes is greater. However, as there are some site allocations which are located beyond easy walking distance of key services, the effect is not considered to be significant positive overall.For SA Objective 5, the effects are likely to be similar to Option 1. Whilst some sites are likely to be located in areas of deprivation, and therefore offer opportunities for regeneration and investment in deprived areas; this is based on the suitability and availability of sites and therefore effects are uncertain, with the degree of uncertainty greater than Option 1 given that the sources of supply are linked to non-strategic policies (Policy H2 and H7) and it is not known where they would be delivered within the City.For SA Objective 6, the effects are the same as Option 1 in that increasing the overall number of homes could indirectly improve healthy lifestyles and reduce health inequalities when compared to homelessness and overcrowding. However, as ‘exceeding’ this housing target is based partly on unknown sources of supply or the ability for homes to be supported by infrastructure, there may come a point when additional delivery is not directly and proportionately linked to better health outcomes. In addition, this policy may result in more homes being located within AQMAs, and therefore the effect is uncertain in the longer-term.Similar to Option 1, seeking to exceed the average minimum of 1,925 homes could increase the positive effects associated with alleviating housing pressure on economic growth (SA Objective 8). However, conversely, the increased focus on housing delivery, optimisation of densities and preventing the loss of residential accommodation could result in | | | | | | | | |

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| | <p>deliver a net gain in biodiversity and to integrate green infrastructure (SA Objectives 11 and 12), and therefore the overall effect is considered to be unknown, subject to implementation.</p> <ul style="list-style-type: none">• Intensifying and densifying development within the urban area and within locations close to public transport routes (e.g. in Areas of Growth and Regeneration) could result in more sustainable commuting patterns and therefore reduce associated emissions, to provide benefits for SA Objective 13, 14, 17 and 18. Whilst this could encourage a shift towards active travel and/or greater use of public transport, this is reliant on user choice and it is unknown as to where windfall sites will be delivered, as such effects are overall unknown.• Identifying sites within the urban area may result in development coming forward within areas of flood risk. Whilst development would be expected to be supported by site-specific flood mitigation, this Option would not proactively direct development towards lower flood risk areas in and of itself, with flood risk and water management being addressed predominantly by other policies (Draft Policy FR1 and FR2); effects of this option are therefore unknown, depending on the siting and design of development brought forward. | <p>a loss of more employment space across the City (DCM17, DCM18 and DCM19); therefore, the potential negative effects are considered to be amplified when compared to Option 1.</p> <ul style="list-style-type: none">• All sources of supply may have effects on the historic environment if these do not conserve or enhance the historic or landscape character or setting. Therefore, similar to Option 1, the effects of this policy option against Objective 10 will be dependent on both the significance of the asset and the overall ability to conserve and enhance the setting or character through site-specific design details. However, seeking to exceed annual targets without an overall cap on the number of units may result in the historic townscape and urban landscape of the City Centre changing. The overall effect is generally uncertain: in some instances, this will be mitigatable through reference to conserving and enhancing the historic environment; however, in other instances the effect may be negative overall. Compared to the Interim SA Report (2019), the potential for negative effects may be sooner, given the overall baseline housing target is higher.• Some sources of supply may have effects on the protection and enhancement of biological and geological assets and green and blue infrastructure particularly where, as set out in Option 1 they would result in the loss of green spaces which are no longer considered to be 'demonstrably special' nor an 'open space of public value'. Given the level of uncertainty as to how densities would be optimised in Areas of Growth and Regeneration it is considered that there is greater potential for negative effects to arise when compared to Option 1.• Again, the assessment of effect of the Option against SA Objectives 13, 14, 17 and 18 is likely to be comparable to Option 1. Whilst the sources of supply, and in particular encouraging optimisation of densities in Areas of Growth and Regeneration which are generally located in areas well served by public transport and close to centres could encourage a shift towards active travel or greater use of public transport, this is reliant on user choice. In addition, elements of the supply figures are largely unknown in terms of where they would be delivered. Based on this, overall effects are considered uncertain against these objectives.• Maximising densities within Areas of Growth and Regeneration and 'other locations' may result in development coming forward within areas of flood risk. Whilst this option would not proactively direct development towards lower flood risk areas, exceeding the homes target is reliant on being supported by service and infrastructure capacity the overall effect could be neutral but uncertain. Whilst development would be expected to be supported by site-specific flood mitigation, this option would not proactively direct development towards lower flood risk areas (SA Objective 15). |
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5.1.2 Strategic Options: Reasonable Alternatives for Housing Distribution

Stage 1: Main objectives and relationship with other relevant plans and programmes

As explained above, the extent to which strategic housing and employment growth options can be considered realistic reasonable alternatives is partly determined by the amount of growth that can be accommodated on deliverable sites across the city. The availability of sites and the amount of land required for any of the growth options means that a combination of different distribution alternatives needs to be assessed.

As set out in Table 7, distribution of growth within the city is contextualised by the Local Plan Objectives of:

- Promoting 'Urban Living' across the city with a focus on brownfield land (Objective 8);
- Enabling sustainable growth of the economy for everyone, with modern workplaces and digital infrastructure fit for the future (Objective 7);
- Taking a plan-led approach to promoting areas with the potential to increase densities and make efficient use of underused land (Objective 10); and
- Allocating and promoting sites for housing and mixed-use development (Objective 11).

Key sustainability issues within the SA Scoping Report (Appendix 1) explained that there was limited land supply to meet housing need; and that there was pressure on city centre land to meet the needs of commercial and residential space.

Assumptions: The urban and already built-up nature of Bristol means that the overall spatial strategy is limited to a narrower range of reasonable alternatives as a result of the following:

- It is not appropriate to suggest alternatives in relation to the location of existing commitments or the retained site allocations from the Core Strategy and Site Allocations. These have already been assessed against the SA Framework and found sound at examination.
- There is an ongoing national policy context to make efficient use of land. Chapter 11 of the NPPF requires planning policies and decisions to promote effective use of land in meeting the needs for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. This is also reflected within the Planning Practice Guidance in relation to accommodating the 'cities and urban uplift'⁶⁰. It follows that there is a need to take a positive approach to applications for alternative uses of land which are currently developed but not allocated for a specific purpose in a plan⁶¹.
- There is an overarching national policy position indicating the permanence of the Green Belt, whereby the fundamental aim of such land is to prevent urban sprawl by keeping land permanently open⁶². Since the preparation of the Interim SA Report (2019), this has gained further weight on the basis that the consultation on the reforms to national planning policy,

⁶⁰ Paragraph: 035 Reference ID: 2a-035-20201216

⁶¹ NPPF Paragraph 121

⁶² NPPF Paragraph 133

launched in December 2022⁶³, proposed that LPAs are not required to review and alter Green Belt boundaries if this would be the only way of meeting housing need in full.

Sources of Supply: It is helpful to start from a position of the sources of supply, before reasonable alternatives are considered for the overall distribution.

1. **Completions:** Completions are derived from the residential land supply monitoring for trends in the period between 2006 and 2023. Between 2007/08 and 2008/09 high numbers of annual completions were achieved in Bristol, reflecting the previously buoyant economy and housing market. A further record year for completions was 2021/ 2022, whereby 2,563 homes were delivered⁶⁴.
2. **Commitments:** Planning permissions which include all sites considered to be deliverable. For reference, the identified deliverable housing supply for the period 2020 to 2025 was 10,579. It is concluded that Bristol do not have a five-year land supply as of 2023^{65 66}.
3. **Existing allocations:** Allocations that have dwelling capacity estimates for sites allocated or identified for development in the Adopted Local Plan - Site Allocations and Development Management Policies (SADMP) and Bristol Central Area Plan (BCAP), where these are not built out or identified for alternative uses.
4. **Small sites:** Supply of small sites (less than 1 hectare⁶⁷ or capable of delivering five or more dwellings⁶⁸).
5. **Making efficient use of land through realising urban potential:** Efficient use of urban land and building at optimal densities through the 'Urban Living' approach. This approach seeks to optimise densities by balancing the efficient and effective use of land, with aspirations for a positive response to context, successful place-making and delivery of quality homes.
6. **Proposed allocations:** Reviewed brownfield site development opportunities over 10 units within the Bristol boundary for sites that do not already benefit from planning permission for residential development. This city-wide search, focused on designated town, district and local centres and railway corridors, with sites analysed against key constraints to make the capacity assumptions more realistic.
7. **Former Important Open Spaces:** A very limited number of former Important Open Space within the adopted Local Plan which are not considered to fulfil the values of Local Green Space or roles of Reserved Open Space contribute to the supply.
8. **Reviewing land currently reserved for the retention of industrial and warehousing uses.** This was based on a review of the condition and occupancy of land and buildings in Principal Industrial and Warehousing Areas (PIWAs) to understand whether these would be suitable to retain and Industrial and Distribution Area (IDA) designation within the next Local Plan.

⁶³ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

⁶⁴ Residential Development Survey 2023: Main Findings

⁶⁵ <https://www.bristol.gov.uk/files/documents/1932-5yhls-report-110621/file>

⁶⁶ The five year local housing need using the standard method and including a 20% buffer was 14,205. The

⁶⁷ NPPF Paragraph 69

⁶⁸ Paragraph: 009 Reference ID: 3-009-20190722

9. Recognising the **supply provided by 'prior approval' of permitted office to residential conversions** under the General Permitted Development Order, an average density was applied to those units where residential conversions were likely to take place across the city.
10. **Three areas of Green Belt release:** In the south east of the city, the Core Strategy sets out that the land in the Green Belt acts as a contingency for meeting future housing needs⁶⁹. An SDL at Bath Road, Brislington was proposed within the publication draft of the JSP for a total of 500 - 750 units. In the south west of the city, three sites were identified for removal from the Green Belt, on land inside the South Bristol Link Road. This includes land at Ashton Gate, land at Yew Tree Farm and land adjacent to Elsbet Drive. Yew Tree Farm has since been discounted.

Stage 2: Identify and describe realistic alternatives

As a result of ensuring conformity with strategic level plans, no spatial distribution alternatives were tested in the March 2019 Consultation Draft or the Further Consultation. The following options are therefore tested for the purpose of the SA with reasons behind each option, and their origins, set out in the following text:

- Option 1: Making best use of urban land and limited Green Belt release (Approach which informs Draft Policy DS1 – DS14, Policy UL1 – UL2 of the March 2019 Consultation Option); or,
- Option 2: Making best use of urban land only – no additional release of land within the Green Belt.

An Assessed Scenario variant of Option 1 is considered within the context of this SA Report in that Yew Tree Farm (previously a contributing site within Draft Policy DS11 'Development allocations' south west Bristol in the March 2019 Consultation Draft) has been removed from the Pre-Submission Publication Version Plan. Commentary of the differences in the effects of removing this site are commented on as part of this Assessed Scenario.

Option 1 Making best use of urban land and limited Green Belt release (the 'Pre-Submission Publication Version 2023 option')

This option effectively forms the basis of the Pre-Submission Publication Version Plan, and assimilates the effects of policies DS1 – DS14, UL1, UL2 and DA1. The main differences since the Interim SA Report (2019) is the increased housing target (i.e. 1,725 homes per year in 2019 to 1,925 homes per year within the Publication Draft).

Alongside known sources of supply set out earlier in this section, including commitments, completions, existing allocations and small sites allowance, this option consists of three main elements for the spatial distribution: intensification and densification of Areas of Growth and Regeneration Areas across the city, identification of some dispersed allocations through the city and limited Green Belt release in relation to the Bath Road and two sites in the south west of the city:

- Areas of Growth and Regeneration Draft Policy DS1 – DS10, DS13 and DS14 were based on locations within the city which had greatest levels of public transport accessibility, and which have the greatest levels of urban potential. Whilst urban potential sites were identified across

⁶⁹ Paragraph 4.5.22. 'Urban Extension in South East Bristol', Bristol Core Strategy (June 2011)

the whole city, fewer underused sites were found in the north Bristol area. Consequently, urban potential tends to be clustered in parts of south and east Bristol. There were notably fewer urban potential sites within the City Centre, and therefore an uplift in supply in these locations arises from potential conversion of office to residential uses⁷⁰.

- Identification of draft Site Allocations (Draft Policy DA1) was based on sites that were suitable and larger than 10 units, outside the Areas of Growth and Regeneration. These have arisen from a range of sources of supply and does include urban potential sites for which there might be no current evidence of availability.
- Green Belt release would include Bath Road and the two south west Bristol sites, as set out within Policies DS11 and DS12.

| Reasonable Alternative | Yes |
|------------------------|--|
| Rationale | <p>This is based on a balanced range of sources of supply, alongside Green Belt release and urban potential sites.</p> <p>Whilst all sites should be suitable, this alternative includes some sources of supply where there is no current evidence of availability. That is, despite ongoing trends of urban potential sites coming forward as planning applications, sources do remain in part unknown.</p> |

Assessed Scenario: Making best use of urban land with limited Green Belt release (the ‘Pre-Submission Publication Version 2023 option’ plus Yew Tree Farm)

A variant of Option 1, relating to distribution of housing need, considers the role of Yew Tree Farm (which was identified within Draft Policy DS11 ‘Development allocations’ south west Bristol in the March 2019 Consultation Draft). This is necessary to consider in isolation as the site, which is located within the Green Belt, was discounted from the Further Consultation 2022. The rationale for not continuing proposals for development at this location was that:

“The land has an important role as part of the existing farming enterprise and is being managed to enhance its nature conservation value. Adjacent land within North Somerset is within the Green Belt and it is considered that together with that land, the area identified continues to contribute to Green Belt purposes.”

As set out earlier in this section, since the preparation of the Interim SA Report (2019) and the consultation on the reforms to national planning policy launched in December 2022, the emphasis on the permanence of the Green Belt has gained further weight. It is proposed that LPAs are not required to review and alter Green Belt boundaries if this would be the only way of meeting housing need in full. For these reasons, it is considered that inclusion of Yew Tree Farm represents an ‘assessed scenario’ worthy of consideration, for which commentary on the difference in effects is set out below.

| | |
|----------------------------------|--|
| Summary of Assessment of Effects | Option 2 and Assessed Scenario 1 are not considered to be vastly different in the assessment of effects. |
|----------------------------------|--|

⁷⁰ See 4.3 and Bristol Urban Potential Assessment (Feb 2018):
<https://www.bristol.gov.uk/documents/20182/33167/Bristol+Urban+Potential+Assessment+2018>

| | |
|--|--|
| | <p>As assessed under Option 2, Assessed Scenario 1 is likely to result in significant positive effects against SA Objective 1 due to its focus on increasing housing supply, however these effects would be unknown given that the sources of supply are uncertain and so is the types of housing that this Assessed Scenario would deliver. Similarly, Assessed Scenario 2 is likely to result in indirect positive effects for SA Objectives 2, 7 and 9 overall although these would be uncertain given that sources of supply are unknown. There is considered to be higher potential for negative effects given that the increase in supply targets would likely place more pressure on greenfield/Green Belt land with knock-on indirect impacts on SA Objectives 3, 7 and 9.</p> <p>It is likely that as housing delivery increases, there is more potential for negative unknown effects on SA Objectives 10, 11 and 12 similar to the assessment made for Option 2. Increased requirements for housing delivery could start to place significant pressure on historic townscape and urban landscape of the City Centre as well as green spaces, wildlife and green and blue infrastructure. Effects on SA Objectives 13 arising from Assessed Scenario 1 are considered to be minor negative, but unknown. Whilst increased housing delivery could result in increased optimisation of densities resulting in a reduced need to travel, the likely need for discussion with neighbouring authorities to meet "unmet need" in this Assessed Scenario could result in an increased need to travel depending on where this "unmet need" was accommodated. For similar reasons, SA Objective 14 is considered to result in unknown effects arising from Assessed Scenario 1. Increased housing delivery is likely to put further pressure on areas of the city already effected by flood risk and/or air pollution as such negative but unknown effects are likely in relation to SA Objectives 16 and 17.</p> |
|--|--|

Option 2 Making best use of urban land only – no release of land within the Green Belt

Given the two areas for Green Belt release amount to around 1,100 units (500 – 750 at Bath Road and the two sites at south west Bristol amount to 650 homes), this option seeks to test effects of higher levels of intensification and densification within the Areas of Growth and Regeneration and retention of more Green Belt land. In the Interim SA Report 2019, the Bath Road SDL was not considered within this Option on the basis that the Local Plan needed to be in conformity with the JSP.

| Reasonable Alternative | Yes |
|------------------------|---|
| Rationale | <p>The Urban Potential Assessment (2018) noted that other development opportunities may exist, such as a larger development area than is currently allocated in the Western Harbour area.</p> <p>Similar to Option 2 in the assessment of Strategic Reasonable Alternatives related to housing need, it is unclear the extent of capacity that will be realised from the Areas of Growth and Regeneration. However, given the latest policy position from Government which strengthens the permanence of Green Belt, the principle of intensifying numbers of homes within the Areas of Growth and Regeneration and releasing less Green Belt land should be considered a reasonable alternative.</p> <p>All other sources of supply, such as existing commitments, completions, existing allocations and the small sites allowance, alongside the identification of draft site allocations are kept constant within this option.</p> |

Stage 3 Assessment and evaluation of effects

Stage 3.1 Consideration of technical and other difficulties in the identification / assessment of alternatives

- No alternatives were presented within the March 2019 Consultation Draft plan or Further Sites Consultation (beyond the retention of Yew Tree Farm within the Green Belt).
- To 'exceed' the housing quantum established at the strategic-plan level, the potential capacity particularly within the Areas of Growth and Regeneration will need to be exceeded. The certainty of deliverability of these sources of supply remains partly unknown.

Stage 3.2 Summary of assessment findings and Selected Approach

The assessment below explores the effects of the two reasonable alternatives against the SA Framework.

In summary, there is no significant difference in the assessment effects between Option 1 and Option 2 with the majority of effects largely unknown at this stage and dependent on the delivery of individual sites.

Overall Option 1 (the Pre-Submission Publication Version 2023 option) identifies more realistic sources of supply to contribute towards meeting the needs of communities within the housing market area. It remains partly unclear the extent to which this Option could provide an adequate and diverse supply of housing to meet overall need across Bristol, for this reason effects are also unknown. Option 2 also records minor positive but unknown effects against SA Objective 1. Effects are unknown for the same reason as reported under Option 1, but also because it is unclear how densification and intensification of sites within the Areas of Growth and Regeneration will contribute to overall housing delivery.

Option 2 would perform better against SA Objective 2 (particularly DMC7) as it would not require the release of land from the Green Belt although effects are unknown. It is considered that increased development pressures which could result from the densification and intensification in Areas of Growth and Regeneration proposed by Option 2 may result in more potential for negative effects on other SA Objectives (e.g. SA Objective 10) when compared with Option 1.

Table 11 Assessment of Strategic Alternatives for Housing Distribution

| SEA Theme | SA Framework Objective | D-M Criteria | Option 1 - Making best use of urban land and limited Green Belt release (the 'Pre-Submission Publication Version 2023 option') | | | | | | | | Option 2 - Making best use of urban land only – no release of land within the Green Belt | | | | | | | |
|-------------------------------------|---|---|--|------|------|----------------------------|--------------------------------|--------------------------|--|--|--|------|------|----------------------------|--------------------------------|--------------------------|---|--|
| | | | Assessment of Significance of Effect (0/+/- / ?) | | | Direct (D) or Indirect (I) | Temporary (T) or Permanent (P) | Spatial Scale of Effect | Receptors (R) and/or affected groups (AGs) | Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB) | Assessment of Significance of Effect (0/+/- / ?) | | | Direct (D) or Indirect (I) | Temporary (T) or Permanent (P) | Spatial Scale of Effect | Receptors (R) and/or affected groups (AGs) | Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB) |
| | | | Short | Med | Long | | | | | | Short | Med | Long | | | | | |
| Population, Housing and Communities | 1. To ensure an adequate and diverse supply of housing that is affordable to everyone | DMC1 DMC2 DMC3 DMC4 | ++/? | ++/? | ++/? | Both | P | City-wide; transboundary | R: Local Housing Market and Bristol's population. AG: Bristol's population and households. | n/a | ++/? | ++/? | ++/? | Both | P | City-wide; transboundary | R: Local Housing Market and Bristol's population AG: Bristol's population and households. | AM: Demonstrate how density could be maximised in Areas of Growth and Regeneration on a site-specific basis. |
| | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land | DMC5 DMC6 DMC7 | ++/? | ++/? | ++/? | Both | P | Local and City-wide | R: Various (urban and greenfield sites). AG: Bristol's population and households. | AM: Demonstrate that use of suitable brownfield sites is maximised, including demonstrating that brownfield land in the Green Belt has been pursued first. | ++/? | ++/? | ++/? | Both | P | Local and City-wide | R: Various (urban and greenfield sites). AG: Bristol's population and households. | n/a |
| | 3. Ensure easy and affordable access to key services | DMC8 | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a |
| | 4. Increase participation in cultural and community activities | DMC9 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Health and Inequalities | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | DMC10 DMC11 | ++/? | ++/? | ++/? | D | P | Local and City-wide | R: Bristol's population and household within deprived areas. AG: As above. | AM: Provide evidence of the consolidation of PIWA land. | ++/? | ++/? | ++/? | D | P | Local and City-wide | R: Bristol's population and household within deprived areas. AG: As above. | AM: Provide evidence of the consolidation of PIWA land. |
| | 6. To reduce health inequalities and promote healthy lifestyles across the city | DMC12 DMC13 DMC14 | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and household within poor health areas. AG: As above. | n/a | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and household within poor health areas. AG: As above. | n/a |
| | 7. Ensure access to education and learning for all sections of society | DMC15 DMC16 | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a |
| Economy and Employment | 8. To support the economy and ensure that there are suitable opportunities for employment | DMC17 DMC18 DMC19 DMC20 DMC21 | ? | ? | ? | D | P | Local and City-wide | R: Bristol's employees and employers. AG: As above, and Bristol businesses. | n/a | ? | ? | ? | D | P | Local and City-wide | R: Bristol's employees and employers. AG: As above, and Bristol businesses. | n/a |
| | 9. Ensure access to a range of shopping facilities for all sections of society | DMC22 DMC23 | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a | ++/? | ++/? | ++/? | I | P | Local and City-wide | R: Bristol's population and households. AG: As above, and Bristol businesses. | n/a |
| Townscape and | 10. To ensure the protection and enhancement of the historic environment and its setting | DMC24 | -/? | -/? | -/? | Both | P | Local and City-wide | R: Cultural heritage; historic environment. AG: Bristol's population. | n/a | --/? | --/? | --/? | Both | P | Local and City-wide | R: Cultural heritage; historic environment AG: Bristol's population. | n/a |

| | | | | | | | | | | | | | | | | | | | | |
|--|--|----------------------------------|--|-----|-----|------|-----|-----------------------------|---|--|-----|---|-----|------|-----|-----------------------------|---|-----|--|--|
| | 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats | DMC25 DMC26 | 0/? | 0/? | 0/? | Both | P | Local and City-wide | R: Local wildlife and biodiversity; natural environment. AG: Bristol’s population; wildlife. | MB: Set out how Green Belt release can be offset through compensatory improvements. | ? | ? | ? | Both | P | Local and City-wide | R: Local wildlife and biodiversity; natural environment. AG: Bristol’s population; wildlife. | | | |
| | 12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation | DMC27 | 0/? | 0/? | 0/? | Both | P | Local and City-wide | As above. | MB: Set out how Green Belt release can be offset through compensatory improvements. | ? | ? | ? | Both | P | Local and City-wide | As above. | n/a | | |
| Transport and Movement | 13. To encourage a demonstrable modal shift and reduce the need to travel | DMC28 DMC29 | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | + | + | + | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | | |
| | 14. To maintain and improve the existing highway network | DMC30 DMC31 | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | | |
| Climate, Energy and Waste | 15. To reduce the risk of flooding from all sources | DMC32 DMC33 | ? | ? | ? | Both | P | Local and City-wide | R: Natural environment (water); AG: Bristol’s population; local wildlife. | n/a | -/? | -/? | -/? | Both | P | Local and City-wide | R: Natural environment (water); AG: Bristol’s population; local wildlife. | n/a | | |
| | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | DMC34 DMC35 DMC36 DMC37 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | | |
| | 17. Minimise air and noise pollution | DMC38 | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | -/? | -/? | -/? | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | | |
| | 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 | DMC39 DMC40 DMC41 DMC42 | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | ? | ? | ? | Both | P | City-wide and transboundary | R: Bristol’s population and natural environment. AG: Commuters and businesses. | n/a | | |
| Reasonable Alternative Evaluation of Effects and Rank | | | <p>Rank Score: 1 - This strategic reasonable alternative is related to a more dispersed distribution of development across the city. Whilst this option would support provision of land for residential development across the city, it would also result in areas of Green Belt release.</p> <p>Whilst this Option would have a greater chance in ensuring sufficient homes are provided to meet need, this Option would increase the level of Green Belt land released. Whilst this Option therefore carries the uncertain, and potentially negative, effects of release of Green Belt land and more dispersed development within the city, there is more likely to be a realistic prospect that housing will be delivered.</p> <p>Scale of effects: As a strategic reasonable alternative related to the distribution of housing and ability to contribute to land for housing need, the scale of effects would have both city-wide and housing-market area effects. However, depending on sites identified as suitable to contribute towards the overall supply, effects may also be localised and site-specific.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none">The Option is more likely to contribute towards meeting the identified needs of communities within the housing market area (Objective 1, DMC1). As with the strategic reasonable alternatives on housing quantum, this option does not prescribe the type of housing to meet identified need, however a mix of units, delivery methods and affordability is indirectly likely by introducing supply from a range of different types of site.Whilst this Option would see housing supply achieved by realising urban potential and through efficient use of land, a proportion of total supply is achieved through Green Belt release in three locations within the City. The overall balance of the | | | | | | | | | <p>Rank Score: 2 - This strategic reasonable alternative is related to focusing development on urban land and focusing on opportunities for densification and intensification with no release of land within the Green Belt</p> <p>Whilst this Option would support provision of land for residential development across the city, it would result in a level of uncertainty in supply given the removal of land proposed for Green Belt release (amounting to circa 1,100 units). This Option carries the benefits and challenges of concentrating more development within Areas of Growth and Regeneration.</p> <p>Scale of effects: As a strategic reasonable alternative related to the distribution of housing and ability to contribute to land for housing need, the scale of effects would have both city-wide and housing-market areas effects. Effects will also be localised and site-specific.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none">Option 2 is also considered to result in minor positive but uncertain effects against SA Objective 1. Compared to Option 1 there is greateruncertainty as to whether the required supply can be delivered without Green Belt release. As with the strategic reasonable alternatives on housing quantum, this option does not prescribe the type of housing to meet identified need, however a mix of units, delivery methods and affordability is indirectly likely by introducing supply from a range of different types of site.As this Option would concentrate development within the urban area and Areas of Growth and Regeneration, this Option would likely maximise opportunities for re-use and regeneration of land and higher densities. Therefore the overall effect | | | | | | | | |

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| | <p>effect is therefore likely to be positive against this SA Objective; based on an overall significant positive assessment against DMC5 and DMC6, however an overall negative effect against DMC7.</p> <ul style="list-style-type: none">• For SA Objective 3 (DM8), SA Objective 7 (DCM16) and SA Objective 9 (DCM22 and DCM23), this Option could increase the number of homes within easy and affordable access to key services and community facilities. Areas of Green Belt release and urban potential areas are generally within more accessible locations within the city, however this is not always the case. Therefore, whilst the overall effect is likely to be positive, it is uncertain and dependent on specific site locations.• Areas of Growth and Regeneration are located within areas of deprivation and therefore there are opportunities for regeneration and investment in deprived areas, these effects are unknown as they are contingent on the suitability and availability of sites. Identification of land within the Green Belt in south Bristol is also likely to offer potential for investment (such as new homes, jobs and infrastructure) in area that is more deprived.• Lack of good quality housing, homelessness or a degraded urban environment can contribute to overall poor health. For SA Objective 6, increasing the overall number of homes across the city could indirectly improve health and reduce health inequalities. The assessment of these effects will need to be supplemented with policies that focus on the overall quality of homes and ensuring mitigation to measures which may impact human health (such as locating homes in areas of flood risk and AQMAs).• This option could result in positive effects associated with alleviating housing pressure on economic growth (SA Objective 8), within Areas of Growth and Regeneration, mixed use development including workspace is encouraged but the extent to which this is delivered is unknown. Increased housing delivery on previously developed land is likely reduce the level of, albeit largely vacant or underused, employment land. Based on this the overall effect is unknown. The sites proposed within the Green Belt are not considered to result in additional effects on this objective.• All sources of supply may have effects on the historic environment if these do not conserve or enhance the designated historic asset, character or setting. Delivering urban potential may result in a change to the historic townscape and urban landscape of the City Centre as a whole, however the effects of this policy option against SA Objective 10 will be dependent on both the significance of the asset and the overall ability to conserve and enhance the setting or character through site-specific design. Release of Green Belt land was considered to be neutral overall. On balance, the overall effect may be negative, however this is uncertain and subject to implementation.• Identification of additional development potential has included a review of sites formerly designated as Important Open Space. Alongside Green Belt Release, this could result in the loss of green spaces which are no longer considered to be ‘demonstrably special’ nor an ‘open space of public value’ resulting in negative effects against SA Objective 11. However, development would be required to deliver a net gain in biodiversity and to integrate green infrastructure (SA Objectives 11 and 12), which would introduce associated benefits. The overall effect could be neutral, however, the assessment of the effects of this policy would be site dependent.• Whilst this Option could encourage a shift towards active travel or greater use of public transport, effects are uncertain (SA Objectives 13, 14, 17 and 18). Whilst Green Belt locations are generally within walking distances of public transport and major infrastructure improvements, there are some draft site allocations which are located beyond easy walking distance of key services, similarly whilst Areas of Growth and Regeneration are located in accessible locations many are within AQMAs. The overall effect is therefore uncertain against these SA Objectives.• The effects of this option on SA Objective 15 are unknown as it remains dependent on the level of flood risk experienced at individual sites and surrounds as well as the design and type of development. | <p>is therefore likely to be significant positive but unknown as the extent to which intensification and densification in Areas of Growth and Regeneration will be possible is unknown.</p> <ul style="list-style-type: none">• For Objective 3 (DM8), Objective 7 (DCM16) and Objective 9 (DCM22 and DCM23), this Option would have similar effects to Option 1, however greater intensification of urban land only could result in more homes being located in close proximity to existing shops and services thereby reducing the need to travel.• As set out under Option 1, Areas of Growth and Regeneration are located within areas of deprivation and therefore there are opportunities for regeneration and investment in deprived areas, these effects are unknown as they are contingent on the suitability and availability of sites. This Option would not seek to allocate sites in the Green Belt, which could result in less investment within the south west of Bristol and therefore positive effects arising from this Option may be less wide ranging.• Lack of good quality housing, homelessness or a degraded urban environment can contribute to overall poor health. For SA Objective 6, increasing the overall number of homes across the city could indirectly improve health and reduce health inequalities. Increasing urban density can improve health outcomes through the ‘paradox of intensification’ which reduces overall vehicle uses and increases active travel. However, densification can indirectly impact older people and young children more. The effects are uncertain, subject to achieving site specific high-quality local environments. Similar to Option 1, this Option would need to be supplemented with policies that mitigate the effects of environmental matters on human health.• This Option could result in similar effects to Option 1 for SA Objective 8.• Same as Option 1, delivering urban potential may result in a change to the historic townscape and urban landscape of the City Centre, however when compared to Option 1, given the focus of Option 2 on densification and intensification in Areas of Growth and Regeneration, including the city centre, significant negative effects are considered more likely due to development pressures. However, the effects of this policy option against SA Objective 10 will be dependent on both the significance of the asset and the overall ability to conserve and enhance the setting or character through site-specific design details.• This Option could result in similar effects to Option 1 for SA Objective 11 and 12, and is considered to produce neutral unknown effects overall, based on the potential loss of green spaces and potential impacts on designated sites within Areas of Growth and Regeneration, alongside the development requirement for biodiversity net gain.• Intensifying and densifying development within the urban area and within locations close to public transport routes is likely to result in more sustainable commuting patterns (SA Objective 13). Although an increase in sustainable community patterns is likely to result in associated emissions, several of the Areas of Growth and Regeneration are located within AQMAs. Increased densification and intensification in these areas may therefore make pollution worse and as such minor negative but unknown effect is recorded against SA Objectives 17. Unknown effects are recorded against SA Objective 14 given that this is likely to be dependent on individual sites.• The effects of this option on SA Objective 15 are unknown as it remains dependent on the level of flood risk experienced at individual sites and surrounds as well as the design and type of development, however intensification of development in the urban area is considered more likely to result in development in areas of flood risk resulting in negative effects. |
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5.1.3 Strategic Options: Reasonable Alternatives for Employment Growth and Distribution

Stage 1 Main objectives and relationship with other relevant plans and programmes

Key sustainability issues identified within the SA scoping report were as follows:

- There is pressure on city centre land to meet the needs of commercial and residential space.
- Bristol was considered to have some of the most deprived areas of educational attainment.
- Bristol has the highest employment rate of the Core Cities^{71,72}, and productivity was also higher than other Core Cities. Bristol has fewer unemployed people than in England and Wales, although it should be noted that Census 2021 was undertaken during the Covid-19 pandemic, which may have influenced the number of people who described themselves as 'economically active'.
- Strong SME community in Bristol; between 2019 to 2021 there were between 2,400 and 2,800 enterprises created annually⁷³.
- Bristol continues to have deprivation 'hotspots' that are amongst some of the most deprived areas in the country.
- Perception amongst employers interviewed within the Business West Skills and Training Survey 2018 and Avonmouth & Severnside Enterprise Area Survey 2017, that lower skilled jobs in the logistics sector are becoming increasingly hard to fill⁷⁴.
- There has been a net loss of office space between 2006 / 07 and 2021 / 22 (414,000m² of office floor space has been lost and 313,868m² new office floor space was completed), which was otherwise consolidated within the City Centre. In addition, there was a gain of over 26,127m² of new industry and warehousing floorspace (B1(b), B1(c), B2, B8, and Sui Generis) completed during 2020/21 with 100% of the new uses of this type being delivered in Avonmouth. Bristol city centre lost 37,742m² of uses within the same classes in 2020/21^{75,76}.
- McKinsey & Co with the Centre for Cities found Bristol as having the only fast growing, globally-significant technology cluster in the UK (outside London)⁷⁷.

Local Plan Objectives therefore seek to enable inclusive growth of the economy for everyone, with modern workplaces and digital infrastructure fit for the future.

National planning policies aim to help create conditions in which businesses can invest, expand and adapt. NPPF (2023) Paragraph 20 requires strategic policies to make sufficient provision for

⁷¹ Bristol Economic Briefing 2019:

<https://www.bristol.gov.uk/documents/20182/33191/Bristol+Economic+Briefing+Web+Final+SGU+Sep19.pdf/8647105e-0b5d-f38c-5168-05c38f0b91ef#:~:text=continued%20to%20fall.-,As%20of%20March%202019%20the%20rate%20was%20at%20a%20record,be%20immune%20to%20external%20factors.>

⁷² Inclusive and Sustainable Economic Growth Strategy (September 2018):

<https://democracy.bristol.gov.uk/documents/s25861/b%20ISEGS%20Final%20Draft%20v3%20CLEAN.pdf>

⁷³ Office for National Statistics (2021) Business demography, UK: 2020.

⁷⁴ https://www.businesswest.co.uk/sites/default/files/distribution_lss_2019_final_for_web.pdf and https://www.businesswest.co.uk/sites/default/files/distribution_lss_2019_final_for_web.pdf

⁷⁵ Bristol City Council (2020) Bristol Development Monitoring Report 2020.

⁷⁶ Bristol City Council (2021) Bristol Development Monitoring Report 2021.

⁷⁷ McKinsey & Co with the Centre for Cities, explored further within Inclusive and Sustainable Economic Growth Strategy (September 2018)

employment and other commercial development. Paragraph 81 of the NPPF (2023) states that significant weight should be placed on the need to support economic growth and productivity, by taking into account both local business needs and wider opportunities for development. The approach should aim to allow each area to build on its strengths, counter any weaknesses and address the challenges in the future. Paragraph 82 makes reference is made to the Government's Industrial Strategy⁷⁸ and any local variations of these, in seeking to drive innovation, such as through a low-carbon economy, and increasing productivity.

However, the NPPF also requires policies to promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, including making as much use of possible previously-developed 'brownfield land'. This follows an evolution of how land for employment is used, and represents a national policy shift towards land being used to meet housing needs:

- Paragraph 122 requires planning policies and decisions to reflect changes in the demand for land. Where an authority considers there to be no reasonable prospect of an application coming forward for the allocated use, they should seek to reallocate this for more deliverable uses that can help address identified needs, or deallocate a site. In the interim, applications for alternative uses on land should be supported.
- Paragraph 123 states that LPAs should also take a positive approach to applications for alternative use of land, which is currently developed, but not allocated for a specific purpose where this would help to meet identified needs. Authorities are encouraged to support the use of retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or the viability / vitality of local centres.

The PPG requires strategic policy-making authorities to prepare robust evidence base documents to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions⁷⁹. This evidence should be established across functional economic market areas, and include up-to-date evidence on stock of employment land, market demand and recent patterns through employment land supply. Employment land requirements should be derived through assessment of Standard Industrial Classification sectors for use classes and type of property, employment density guides and floorspace to site area plot ratios.

For the Interim SA Report (2019), the appraisal was based on the employment policy direction set by the JSP. This direction was informed by the Economic Development Needs Assessment (EDNA) (2016)⁸⁰, which indicated that whilst the economic development needs of the FEMA can be met in available developable employment space⁸¹, that there was a relative imbalance between employment land supply and economic development needs in some locations. In summary⁸²:

- There was considered to be a relative oversupply of land at Avonmouth / Severnside to meet economic development needs, however options at this location indicated that Avonmouth could

⁷⁸ HM Government (2017) Industrial Strategy: Building a Britain fit for the future.

⁷⁹ Paragraph: 025 Reference ID: 2a-025-20190220

⁸⁰ SD15B West of England Economic Development Needs Assessment (EDNA) (2015)

⁸¹ 4.19 of West of England JSP Topic Paper 3: Employment (2017)

⁸² 4.19 of West of England JSP Topic Paper 3: Employment (2017)

become a long-term reservoir of employment land to meet future unidentified needs, or that land could be identified at this location for a greater diversity / mix of uses.

- To address relative deprivation and market failure in South Bristol, development schemes (infrastructure, housing and employment) within South Bristol and its fringe could be pursued.
- To fulfil the economic potential of the WoE area and to provide employment that will address areas of relative deprivation it is important that the local workforce has the relevant skills to meet business needs.

Reflecting the content of the Strategic Economic Plan prepared by West of England LEP, the employment strategy within the JSP saw strategic employment growth focussed on promoting existing employment centres (including Enterprise Zones and Enterprise Area), making best use of land and intensifying economic activity. Bristol City Centre, the Temple Quarter Enterprise Zone, Avonmouth Severnside Enterprise Area and Bristol Port were identified as strategic employment growth locations.

Since the March 2019 Consultation Draft was published for consultation and the Interim SA Report (2019) was prepared, the Bristol Employment Land Study (2019, published 2021) (ELS) was released. This reflected changes to economic circumstances post-pandemic, and identified variations as follows:

- The office sector in recent years was considered to be dominated by demand for smaller units of less than 1,000 sqm, which is reflective of the other cities outside of London, including Manchester and Birmingham. This is partially as a result of changing working practices and technological advances that allow people to work in an increasingly agile way. The focus for the office sector is increasingly the city centre due to the accessibility and amenity benefits, which assist employers in attracting and retaining staff.
- Within the industrial / warehousing sector, the market demand is predominantly for smaller units below 1,858 sqm as reflected in the historic take-up information. Avonmouth/Severnside has experienced the highest amount of take-up in recent years dominated by some very large distribution and warehouse facilities built for the Range, Amazon and Lidl etc. The ELS notes that this is likely to continue to be a sought-after location, subject to infrastructure and recruitment related challenges being overcome.
- The more urban industrial / warehouse markets, particularly the central areas (such as St Philip's, Bedminster, Lawrence Hill etc.) and south of the city (for example Brislington, Ashton, Hengrove etc.) make an important contribution to the city. They cater for a mix of businesses, offering proximity to staff and customers. The rise in last mile logistics will create further demand for these areas.
- Other trends seen in other cities have not been experienced in Bristol, i.e. multi-height warehouses and residential above industrial uses.

In relation to supply, the ELS (2019) considers that there is insufficient supply of land in the pipeline to meet net additional or replacement floorspace requirements for office and industrial land.

Table 12 ELS (2021) Forecasts for Employment Requirements

| | Oxford Economics Medium – High Growth Scenario (82,500 new jobs) | | Oxford Economics High Growth Scenario (100,000 new jobs) | |
|----------------------|--|---|--|---|
| | Office | Industrial | Office | Industrial |
| Net Additional | 207,000 sq m | 117,000 sq m | 250,500 sq m | 189,100 sq m |
| Replacement | 225,000 – 450,000 sq m | 494,000 – 988,000 sq m | 225,000 – 450,000 sq m | 494,000 – 988,000 sq m |
| Sub Total | 432,200 – 657,000 sq m | 611,000 – 1,105,000 sq m 153 – 275 ha | 475,000 – 700,900 sq m | 638,100 – 1,177,100 sq m 171 – 294 ha |
| Historic Completions | 485,000 sq m | 876,100 sq m 219 ha | 485,000 sq m | 876,100 sq m 219 ha |

The ELS (2019) indicates that pipeline planning permission estimates are used to determine that the supply should be:

- 357,000 sq m of capacity for office floorspace (60% of the West of England total)
- 88.6ha of industrial and warehouse land (22% of the West of England total)
- 5.8ha of mixed B Use Class land (i.e. potential for office and industrial uses) (2% of the West of England total)

It specifically considers:

- There is limited supply available to meet demand for office and industrial / distribution space. Permitted Development Rights present a further risk to the supply of existing office stock, in particular ‘affordable’ space needed by growing SME businesses and flexible office operators. In addition, supply challenges from an industrial/distribution perspective could be exacerbated by the emerging policy, particularly in relation to the former PIWAs not to be retained as IDAs.
- Proposed allocations for industrial and warehousing space are supported; however, will not alleviate the market pressure resulting from the emerging policy approach to the former PIWAs not to be retained.
- In relation to policy interventions, the ELR recommends that the following is introduced:
 - Adopt a floorspace target for the city and core market areas, including the Areas of Growth and Regeneration (AGRs).
 - Allocate sites for the delivery of new accommodation (either standalone or part of a mix of uses).
 - Require a masterplan for the Areas of Growth and Regeneration to include appropriate employment provision.
 - Consider a targeted Article 4 to restrict Permitted Development Rights for office to residential.
 - Monitor the supply position through the Annual Monitoring Report (AMR) to enable swift response if the supply position remains challenging.

The Employment Land Spatial Needs Assessment (ELSNA) (2021), prepared in support of the Spatial Development Strategy for the West of England, has also been published since the March 2019 Consultation Draft was published for consultation and the Interim SA Report (2019) was prepared. It aimed to examine the case for employment land supply and demand, based on the West of England Local Industrial Strategy, the West of England Employment & Skills Plan and the West of England Recovery Plan alongside a review of the property market. The ELSNA considered:

- **Industrial Market:** There is a shortage of medium and small sites to support the advanced manufacturing and engineering sectors. These sectors seek modern premises in accessible locations, close to the area where this sector is concentrated (the arc from Emersons Green Enterprise Area to Filton Enterprise Area, including the University of the West of England and the M4/M5 interchange).
- **Logistics and distribution market:** The growth of this sector is a national trend and has been accelerated by Covid-19 and the increase of online shopping. This results in higher demand for large premises to support distribution, which is focused in the Avonmouth and Severnside areas. The ELSNA study identifies that there may be limited supply of land in this area if demand continues to grow. The ELSNA also identifies a particular need for smaller scale 'last mile' distribution premises which require more accessible locations to residential areas.
- **Office market:** The office market is concentrated in Bristol (and Bath) city centres. This is supported by key developments including the Temple Quarter Enterprise Zone. Supply of office space has reduced since 2010 and there is an undersupply of high quality (Grade A) space.
- **Other employment related spatial issues**
 - Bristol University are planning to develop a second campus in Temple Quarter. There is potential for this to increase research, innovation and skills capacity required to drive economic growth of the Enterprise Zone.
 - The use of retail buildings on the high street is likely to change (particularly in Bristol and Bath City Centres). This may present opportunities to provide floorspace for other key sectors. This may include employment-generating community activities that benefit from a central urban location.
 - Poor public transport provision to employment locations is a critical issue. Improved transport links will improve access to employment and help reduce inequalities in the region. It will also improve access to the labour market for employers.

Stage 2: Identify and describe realistic alternatives

Responses emerging from the 2019 Consultation considered that other options existed in relation to the level or distribution of employment land. Whilst some supported the overall approach, a number of comments raised concerns or requests in relation to the following summarised points:

- Request that a specific employment land target be defined within the Plan, to prevent an 'imbalance' in the Plan away from the economic uses within the city particularly in light of levels of housing growth. This has now been addressed within Policy E2.
- Concerns that the strategy for employment land in South Bristol was inadequate in the context of significant levels of housing planned. This is now considered as an 'Assessed Scenario 1' within this SA Report.
- Concerns about the loss of manual and lower value employment from a strategy which provides limited protection of any loss of manual jobs, and which favours high tech and high value employment sectors. This is now considered as an 'Assessed Scenario 1' within this SA Report.
- Comments suggested that the proposed Bath Road Strategic Development location could act as a significant source for employment land in South East Bristol, particularly through its proximity to Brislington Trading Estates. This was assessed as a reasonable alternative within the Interim SA Report (2019).

Stage 2.1 Reasonable Alternatives Employment Land and Growth strategy

Assessed Scenario 1: Prioritising employment land supply to match requirement within the ELS

In conformity with the employment land strategy set out within JSP, no reasonable alternatives or options were tested within the March 2019 Consultation Draft nor the Further Consultation (November 2022). This was in part because the EDNA (2016) concluded that no additional employment land was required beyond that already identified across the region within the Local Plans or within the strategy set by the Strategic Economic Plan.

Since the March 2019 Consultation Draft was published however, both the West of England ELSNA (2021) and the Bristol ELS (2019) have been released which apply a more conservative approach to the need for employment land. Both indicate that there is an insufficient supply of land in the pipeline to meet net additional or replacement floorspace requirements for office and industrial land. In response to this evidence, Policy E2 *Economic Development Land Strategy* was updated to specifically make reference to the need for net additional floorspace as follows:

- 164,000 sq m of net additional office floorspace
- 155,000 sq m of net additional industry and distribution floorspace.
- 60 hectares of additional land for industry and distribution

An 'assessed alternative' may therefore consider whether revising the extent of the former Principal Industrial and Warehousing Areas across the City is considered to be a reasonable approach, and whether the balance of meeting both housing and employment needs can be more evenly addressed.

| Reasonable Alternative | No |
|------------------------|---|
| Rationale | <p>Whilst the total additional areas of floorspace set out within Policy E2 are lower than those set out in the ELS (2019), this approach was considered to align with the balance of achieving the overall Plan Objectives of 'enabling the sustainable growth of our economy for everyone, with modern workplaces and digital infrastructure fit for the future' whilst aiming to exceed the housing target.</p> <p>This approach also seeks to achieve the objective of taking a plan-led approach to promoting areas with the potential to increase densities and make efficient use of underused land, which is endorsed within the NPPF (2023) Paragraph 122 and 123, alongside the Planning Practice Guidance in relation to cities and urban areas that are subject to the urban uplift.</p> <p>An alternative approach which therefore seeks to prioritise employment land supply to match the requirements within the ELS was not considered to be reasonable on the basis of lack of alignment with the overall Plan Objectives, and support from national policy to encourage efficient use of land particularly within urban areas.</p> <p>To mitigate the effects of the potential loss of employment land formerly designated as PIWA and encourage efficient use of land within the urban area of Bristol, revised Policy E2a New Workspace within Mixed Use Development requires the provision of new workspace in specific sectors where sites and premises have currently or recent been used for business, industry and distribution. This policy would be applied in combination with Policy E1, which aims to remove barriers for local employment and match the skills of local employees to new jobs created.</p> |

| | |
|----------------------------------|---|
| Summary of Assessment of Effects | <p>An indicative summary of effects for this 'Assessed Option' are set out as follows. These are largely the inverse of Option 2 for Housing Need (see Section 5.1.1) for objectives related to housing and employment.</p> <p>This Assessed Option may result in the potential for negative effects against SA Objective 1 given that in order to meet employment and supply requirements within the ELS it is likely that land identified for housing delivery would be compromised, although effects would be uncertain. Effects for SA Objective 2 are likely to be neutral or continue to be positive uncertain: on the one hand, continued development of former PIWA sites is likely to result in ongoing use of brownfield land, whereas meeting the level of land supply stated within the ELS may realistically require additional greenfield development.</p> <p>Conversely, Assessed Option 1, would likely result in significant positive effects against SA Objective 8 although, as described above, this may be at the expense of housing delivery and ultimately would maintain an 'imbalance' within the Plan, however under this Assessed Option this would be towards employment land delivery.</p> |
|----------------------------------|---|

Stage 2.2 Reasonable Alternatives for Distribution of Employment Land

Neither the March 2019 Consultation Draft, nor the Further Sites Consultation (2022) set out reasonable alternative suggestions for the location of employment land within Bristol. This was because, whilst the JSP considered reasonable alternative for the location of employment land, these only related to the employment uses on SDL sites.

Similar to the Interim SA Report (2019) and appraisal of effects, the following options are therefore tested for the purpose of this SA with the reasons behind each option and their origins, are set out in the following text:

- Option 1: Approach which informs Policies E2, E3, E4 and E5 within the Pre-Submission Publication Draft Plan.
- Option 2: Option 1 plus the allocation of land at SW and SE Bristol for employment land uses.

Option 1 Strategic employment locations and employment intensification

This option is consistent with the draft policy approach which informs E2, E3, E4 and E5 within the Pre-Submission Publication Draft Plan. This includes:

- The development of workspace at key locations including Bristol City Centre, Bristol Temple Quarter and St Philip's Marsh, Avonmouth Enterprise Area and Bristol Port, and town, district and local centres (Policy E2).
- New workspace provided where industrial and distribution premises are redeveloped for mixed uses at Areas of Growth and Regeneration and elsewhere at underused land in industrial uses (Policies DS1-DS15, Policy E2A 'New workspace within mixed use developments' and Policy DA1 'Proposed Development Allocations').
- 35 Industry and Distribution Areas which will be reserved exclusively for industrial, distribution and related uses (Draft Policy E4 'Industry and Distribution Areas').
- 640 hectares of land retained exclusively for industry, distribution, port uses and energy at Avonmouth Enterprise Area (Policy E5)
- Land will be allocated for industry/distribution at: greenfield sites at Avonmouth industrial area (Draft Policy E5 'Avonmouth Industrial Area and Bristol Port') 60 hectares.

| | |
|------------------------|--|
| Reasonable Alternative | Yes |
| Rationale | This approach also seeks to achieve the objective of taking a plan-led approach to promoting areas with the potential to increase densities and make efficient use of underused land, which is endorsed within the NPPF (2023) Paragraph 122 and 123, alongside the Planning Practice Guidance in relation to cities and urban areas that are subject to the urban uplift. |

Option 2 As Option 1 plus and allocation of additional greenfield land for industry

Consultation responses relating to the proposed land uses on the Bath Road Green Belt Site considered that, to prevent the displacement of employment to Avonmouth where there were perceived challenges of accessibility by public transport, this option would see land at Bath Road Brislington and sites at South West Bristol Green Belt sites allocated for industrial and distribution employment uses. A reasonable alternative is to consider the allocation of this greenfield land for industrial uses. This alternative would also result in the allocation of additional land for employment uses in South Bristol.

| | |
|------------------------|--|
| Reasonable Alternative | Yes |
| Rationale | Given a number of former PIWA allocations are well-occupied suggesting healthy demand, there may be a case for additional industrial land to be considered, with a particular focus on South Bristol where green field opportunities may be present and where development could contribute to regeneration objectives. |

Stage 3: Assessment and evaluation of effects

Stage 3.1 Consideration of technical and other difficulties in the identification / assessment of alternatives

As set out earlier within section 5.1.3, the assessment of alternatives in relation to either employment need or distribution was challenging as the quantum of development was previously defined within the now-withdrawn JSP. Neither the March 2019 Consultation Draft nor the Further Consultation (2022) consider reasonable alternatives related to employment.

Evidence base documents, in the form of the ELSNA (2021) and the ELS (2019) have emerged since the March 2019 Consultation Draft, both of which indicate an undersupply of employment land. Whilst there are policies within the draft Pre-Submission Publication Version Draft Plan (2022) which seek to mitigate the implications of this undersupply, there is limited evidence to support an understanding of whether these will be sufficient and therefore monitoring is suggested.

Stage 3.2 Summary of assessment findings

The assessment of effects for Reasonable Alternative Option 1 and 2 are not significantly different, with effects for Objectives 3, 6, 7, 9, 11, 15 and 16 being broadly comparable. However, there are a number of objectives where notable differences are identified.

Option 2 would reduce the level of land available for around 850 homes based at the South West Green Belt sites, and therefore additional land for homes across the city may need to be identified. The overall effect of Option 2 on Objective 1 is therefore considered to be minor negative, as it is unlikely to support Plan Objectives or SA objectives to ensure an adequate and diverse supply of housing that is affordable to everyone.

Effects for Objective 2 are more complex. Both options are founded on efficiently using brownfield land: the vast majority of Industrial and Distribution Areas are located on previously developed land; and the development of new workspace as part of mixed-use developments is proposed predominantly on brownfield land within Areas of Growth and Regeneration. However, both options do also include proposed employment allocations on greenfield sites, including 60 hectares of employment land at Avonmouth. In the case of Option 2, this would result in employment development on Green Belt land.

In relation to Objective 5, around a quarter of IDAs and over half of the Areas of Growth and Regeneration Areas overlap with the top 10% most deprived LSOAs within the Index Multiple Deprivation (IMD, 2019) and therefore these areas may benefit from intensification of employment uses and greater investment in the built form. Areas of Avonmouth, Hengrove and Eastville are identified as in the top 30% most deprived LSOAs and therefore the defined employment allocations could also result in investment in relatively deprived areas. However, Option 2 would likely have a more beneficial effect against Objective 5, in that this would result in more land being allocated for development within South Bristol, which is considered to have more deprived areas when considered against the IMD 2019.

Whilst it is assumed that both options would result in no net loss of employment land, the assessment of these against Objective 8 will require further articulation of how employment land provision meets demand for different employment uses. In relation to DMC18 and DMC19, both options could result in the provision of a range of high-quality employment spaces and maintenance of strategic employment opportunities to meet employment need, however it could reduce the overall range of spaces available within their current form in the city centre. Further employment-related evidence base documents should consider how employment land could meet priority employment sectors, as set out within the Local Industrial Strategy. In relation to DMC21, the extent to which the supply of employment sites can support the delivery of carbon neutral employment alone is uncertain; this will relate to the sector focus and the ability to ensure sustainable travel and air quality impacts from employment uses.

Locating more employment land on Green Belt sites to the south west of the City may increase road-based transport movements associated with employment use. The impact of both options would need to be supported by updated modelling to test the effects on highway network (DMC30) and implications on air quality.

Based on the evidence available, the effects are broadly comparable for these two options. Further evidence is needed to balance the assessment of effects: Option 1 could be seen as preferable as it could enable more homes to be delivered, whereas Option 2 could represent an opportunity to deliver more land for employment within an already deprived area of the City.

Table 13 Reasonable Alternatives for Distribution of Employment Land

| SEA Theme | SA Framework Objective | D-M Criteria | Option 1: Strategic employment locations and employment intensification: employment development at strategic locations, land reserved as industrial and distribution areas and creation of workspace (Draft Policy E2) | | | | | | | | Option 2: Option 1 plus and allocation of Green Belt land for industry | | | | | | | |
|-------------------------------------|---|---|--|-----|------|----------------------------|--------------------------------|--------------------------|---|---|--|-----|------|----------------------------|--------------------------------|--------------------------|---|--|
| | | | Assessment of Significance of Effect (0/+/-/?) | | | Direct (D) or Indirect (I) | Temporary (T) or Permanent (P) | Spatial Scale of Effect | Receptors (R) and/or affected groups (AGs) | Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB) | Assessment of Significance of Effect (0/+/-/?) | | | Direct (D) or Indirect (I) | Temporary (T) or Permanent (P) | Spatial Scale of Effect | Receptors (R) and/or affected groups (AGs) | Suggested Appropriate Mitigation (AM) / Policy Cross-reference (CR) / opportunity to maximise benefit (MB) |
| | | | Short | Med | Long | | | | | | Short | Med | Long | | | | | |
| Population, Housing and Communities | 1.To ensure an adequate and diverse supply of housing that is affordable to everyone | DMC1 DMC2 DMC3 DMC4 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | -/? | -/? | -/? | D | P | Local | R and AG: Local housing market, Bristol's population. | AM: Identify alternative sites to contribute to housing need. |
| | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land | DMC5 DMC6 DMC7 | -/? | -/? | -/? | D | P | City-wide | R and AG: Brownfield sites and greenfield sites, Bristol's local economy and local businesses. | n/a | -/? | -/? | -/? | D | P | City-wide | R and AG: Brownfield sites and greenfield sites, Bristol's local economy and local businesses. | n/a |
| | 3. Ensure easy and affordable access to key services | DMC8 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| | 4. Increase participation in cultural and community activities | DMC9 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Health and Inequalities | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | DMC10 DMC11 | +/? | +/? | ? | D | P | City-wide | R: Built environment; AG: Bristol's population and employees. | AM: Continue to monitor employment land take-up and demand across broad sectors, to determine whether land in IDAs will match demand in the long-term. | +/? | +/? | ? | D | P | City-wide | R: Built environment; AG: Bristol's population and employees | AM: Continue to monitor employment land take-up across broad sectors, to determine whether land in IDAs will match demand in the long-term. |
| | 6. To reduce health inequalities and promote healthy lifestyles across the city | DMC12 DMC13 DMC14 | ? | ? | ? | Both | Both | Local and City-wide | R and AG: Bristol's employees, adjacent population and general public health. | n/a | ? | ? | ? | Both | Both | Local and City-wide | R and AG: Bristol's employees, adjacent population and general public health. | n/a |
| | 7. Ensure access to education and learning for all sections of society | DMC15 DMC16 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Economy and Employment | 8. To support the economy and ensure that there are suitable opportunities for employment | DMC17 DMC18 DMC19 DMC20 DMC21 | ? | ? | ? | D | P | City-wide; transboundary | R and AG: Businesses employers and employees; economic growth and Bristol's population. | AM: Consider providing sectoral breakdown for employment land and jobs forecast so the extent to which proposed sites meet employment need is clear. AM: Consider referencing priority employment sectors from the Local Industrial Strategy (and future updates and sectoral breakdown in hectares. Consider making specific reference to low carbon sectors. | ? | ? | ? | D | P | City-wide; transboundary | R and AG: Businesses employers and employees; economic growth and Bristol's population. | AM: Consider providing sectoral breakdown for employment land and jobs forecast so the extent to which proposed sites meet employment need is clear. AM: Consider referencing priority employment sectors from the Local Industrial Strategy (and future updates) and sectoral breakdown in hectares. Consider making specific reference to low carbon sectors. |
| | 9. Ensure access to a range of shopping facilities for all sections of society | DMC22 DMC23 | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Townscape and Landscape | 10. To ensure the protection and enhancement of the historic environment and its setting | DMC24 | ? | ? | ? | I | P | Local and City-wide | R: Cultural heritage; built environment; AG: Bristol's businesses, employers and historic environment. | n/a | ? | ? | ? | I | P | Local and City-wide | R: Cultural heritage; built environment; AG: Bristol's businesses, employers and historic environment. | n/a |
| | 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats | DMC25 DMC26 | -/? | -/? | -/? | D | P | City-wide; transboundary | R: Local wildlife and biodiversity including international statutory designations; natural environment. AG: Bristol's population; wildlife. | AM: Undertake Habitats Regulation Assessment screening to determine effect of this policy and its allocations on international and national ecological designations associated with the River Severn and Avon. | -/? | -/? | -/? | D | P | City-wide | R: Local wildlife and biodiversity including international statutory designations; natural environment. AG: Bristol's population; wildlife. | AM: Undertake Habitats Regulation Assessment screening to determine effect of this policy and its allocations on international and national ecological designations associated with the River Severn and Avon. |

| | | | | | | | | | | | | | | | | | | | |
|---|--|----------------------------------|-----|-----|-----|------|------|----------------------------------|---|-----------|---|-----|-----|------|------|----------------------------------|---|-----------|--|
| | 12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation | DMC27 | -/? | -/? | -/? | D | P | Local and City-wide | As above. | As above. | -/? | -/? | -/? | D | P | Local and City-wide | As above. | As above. | |
| Transport | 13. To encourage a demonstrable modal shift and reduce the need to travel | DMC28 DMC29 | ? | ? | ? | Both | Both | City-wide; transboundary | R: Public health and economy; AG: Bristol's population. | n/a | ? | ? | ? | Both | Both | City-wide; transbound ary | R: Public health and economy; AG: Bristol's population. | n/a | |
| | 14. To maintain and improve the existing highway network | DMC30 DMC31 | ? | ? | ? | Both | Both | City-wide; transboundary | R and AG: Bristol's highway network; public health; Bristol's population. | n/a | ? | ? | ? | Both | Both | City-wide; transbound ary | R and AG: Bristol's highway network; public health; Bristol's population. | n/a | |
| Climate, Energy and Waste | 15. To reduce the risk of flooding from all sources | DMC32 DMC33 | ? | ? | ? | Both | Both | City-wide; transboundary | R: Natural environment (water); AG: Bristol's population; businesses; essential infrastructure; local wildlife. | n/a | ? | ? | ? | Both | Both | City-wide; transbound ary | R: Natural environment (water); AG: Bristol's population; businesses; essential infrastructure; local wildlife. | n/a | |
| | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | DMC34 DMC35 DMC36 DMC37 | ? | ? | ? | D | Both | Local; City-wide; trans-boundary | R: Natural environment (water and land); AG: Bristol's population; local wildlife. | n/a | ? | ? | ? | D | Both | Local; City-wide; trans-boundary | R: Natural environment (water and land); AG: Bristol's population; local wildlife. | n/a | |
| | 17. Minimise air and noise pollution | DMC38 | ? | ? | ? | I | Both | Local; City-wide; trans-boundary | R: Localised air quality; biodiversity; public health; built environment; AG: population; local wildlife. | n/a | ? | ? | ? | I | Both | Local; City-wide; trans-boundary | R: Localised air quality; biodiversity; public health; built environment; AG: population; local wildlife. | n/a | |
| | 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 | DMC39 DMC40 DMC41 DMC42 | ? | ? | ? | Both | Both | Local; City-wide; trans-boundary | R: Natural environment; AG: Bristol's population; local wildlife. | n/a | ? | ? | ? | Both | Both | Local; City-wide; trans-boundary | R: Natural environment; AG: Bristol's population; local wildlife. | n/a | |
| Reasonable Alternative Evaluation of Effects and Rank | <p>Rank Score 1: This Option is consistent with Draft Policy E2. This strategic reasonable alternative relates to the location of employment land within Bristol City Centre, Temple Quarter Enterprise Zone and St Philip's Marsh, the Avonmouth Enterprise Area and Bristol Port. It would also relate to development of workspaces within town, district and local centres, and where industrial and distribution premises are redeveloped for mixed uses within the Areas of Growth and Regeneration. The Option would also result in the reservation of 35 Industrial and Distribution Areas, and allocation of Green Belt sites for employment at Avonmouth Industrial Area.</p> <p>Whilst this Option would have a greater chance in ensuring sufficient homes are provided to meet need (by retaining the SW Green Belt sites for residential uses), it is currently unclear what the impact of concentrating employment at Avonmouth would have generally on transport movements within the City or resultant air quality. For allocations around the Avonmouth area, proximity to the national and international habitats associated with the River Severn and River Avon mean that a Habitats Regulations Assessment will be needed to determine detailed effects and mitigation.</p> <p>Scale of effects: As a strategic reasonable alternative related to the distribution of employment land, the scale of effects would have both city-wide and functional economic area wide. Some effects may also be localised and site-specific.</p> <p>Social, economic and environmental effects:</p> <ul style="list-style-type: none">Whilst this option contains the redevelopment of mixed uses at Areas of Growth and Regeneration, the option in itself would not result in provision of sufficient housing to meet the identified needs of all communities in the city. This policy option is therefore not considered to be relevant to Objective 1 (ensuring and adequate supply of housing that is affordable to everyone).The overall assessment of effects against Objective 2 is neutral overall, with effects felt at a city-wide scale. The vast majority of Industrial and Distribution Areas are proposed on previously developed land, the development of new workspace as part of mixed-use developments is proposed predominantly on brownfield land within the Areas of Growth and Regeneration; as such, this strategy is therefore likely to result in positive and significant positive effects for DMC5 and DMC7. However, other proposed employment allocations are all on greenfield sites, and therefore this generates a negative effect against the same decision-making criteria. Proposed allocations on greenfield sites include the 60 hectares of employment land at Avonmouth. For this reason, the overall scale of effect is considered to be minor negative. Whilst the overarching emphasis of this option is on intensifying employment uses, no quantum for workspace within each of the DS policies does mean that the effect on higher densities within sustainable locations is uncertain.Easy and affordable access to key services and retail facilities for employment uses has not been considered to be a directly relevant effect of this option (Objective 3 and Objective 9). However, new workspace within the Areas of Growth and Regeneration including Temple Quarter is likely to have easier access to services.For Objective 5, the effects of this option are complex. Around a quarter of IDAs and six Areas of Growth and Regeneration overlap with areas that are within the top 10% most deprived LSOAs within the IMD and therefore these areas may benefit from intensification of employment uses and greater investment in the built form. Areas of Avonmouth are identified as in the top 30% most deprived LSOAs and therefore could also result in investment in relatively deprived areas. However, as this Option would also reduce the absolute amount of employment land within the inner and outer urban area whilst increasing the level available at strategic employment locations, this could equally reduce opportunities for future employment investment in specific areas. The effects are likely to be uncertain in the long term, based on location and the availability of sufficient space for employment investment of all types. | | | | | | | | | | <p>Rank Score 1: This Option is based on Draft Policy E2 plus Green Belt land allocated for employment uses within South West Bristol. Effects are largely the same as Option 1, other than this Option could represent an opportunity to deliver more land for employment within an already deprived area of the city.</p> <p>Scale of effects: As a strategic reasonable alternative related to the distribution of employment land, the scale of effects would have both city-wide and functional economic area wide. Some effects may also be localised and site-specific.</p> <ul style="list-style-type: none">This Option would result in substitution of three sites in the Green Belt, which could deliver 850 homes, for employment uses. This Option could therefore result in a minor negative effect on the ability to meet the identified needs for all communities within the city, particularly within South West Bristol. The effect of this option on the ability to deliver affordable homes, mix of housing types and delivery methods is unclear (Objective 1).The overall assessment of effects for Option against Objective 2 is considered to be broadly similar. However, alongside the proposed allocation of land on greenfield sites, this option would result in additional proposals within the Green Belt and therefore negative effects for Objective 2 (particularly for DMC7). However, as the scale and number of allocations on greenfield and Green Belt sites would continue to be balanced against intensification of other brownfield sites, the effects are not considered to be significantly negative. The effect of this option in relation to densification is similar to option 2, in that it would still encourage intensification of uses within the IDAs and Areas of Growth and Regeneration, however the effect is uncertain for greenfield and Green Belt sites.For Objective 3, 6, 7, 9, 11, 15, 16 and 18, effects for Option 2 are considered to be broadly similar to Option 1.For Objective 5, the effects for Option 2 are likely to be similar. However, this Option could result in greater levels of investment in South West Bristol where there are existing pockets of deprivation. The effects are therefore likely to continue to be minor positive, with unknown long term effects depending on the uptake of employment land and future demand.For Objective 8, the effects are largely the same as Option 1. However, as set out in Objective 5, this option could result in more investment in the areas that are currently experiencing high rates of unemployment (in South Bristol) and therefore effects could be more positive under DMC19.Effects against Objective 10 are similar to Option 1. Green Belt release was generally considered to have neutral effects in relation to Purpose 4 of the Green Belt (based on the JSP Green Belt Review Stage 1).Whilst effects against Objectives 13 and 14 are broadly similar to Option 1, the south west Green Belt sites are less well serviced by road, rail and port-transport when compared to other areas of the city. The effects of locating more employment in this are the city is unlikely to generate positive effects for Objective 14. This will be required to be tested further through modelling should this option be considered further. | | | | | | | | |

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| | <ul style="list-style-type: none">• For Objective 6, effects are again likely to be complex and uncertain. By concentrating B1, B2 and B8 uses in IDAs, within the AGRs and at Avonmouth, this is likely to result in improved air quality and better living conditions in areas which are no longer adjacent to employment areas. However, conversely, this could concentrate impacts of employment development on specific receptors, which would require appropriate mitigation. By introducing a mix of uses to Areas of Growth and Regeneration, consideration should be given to the compatibility of proposed employment uses with residential uses to prevent impacts on human health, and appropriate mitigation should be provided.• Whilst this option focusses on the overall distribution of employment uses, and therefore not on the provision of adequate educational facilities (Objective 7), there could be opportunities to encourage employers across the city to consider local employment policy requirements, or to partner with local skills establishments and this is supported by Policy E1.• The assessment of this Option against Objective 8 is unclear at this stage, as a result of the following:<ul style="list-style-type: none">◦ In relation to DMC18 and DMC19, this option could result in the provision of a range of high-quality employment spaces and maintained strategic employment opportunities. It is not clear whether this option would result in the net loss of employment land, however it is acknowledged that Policy E2 does not meet the additional or replacement supply of employment land required by the ELS (2019). The effects are complex: this policy could result in positive, city-wide effect on these DMCs (particularly given the DS policies require the provision of workspaces), however, as this option would result in the relocation of some employment land to strategic employment locations across the city, and perhaps the undersupply of employment land, this could also have a negative impact on the current range of sites available.◦ Priority employment sectors for DMC18 are considered to be aerospace, cultural and digital industries, financial, business and legal 'tech' services, as set out within the West of England Local Industrial Strategy (2019). Whilst there is no sectoral breakdown set out within Policy E2, Policy E2A does set out the types of employment premises expected by workspaces. Therefore, the extent to which the option aligns with this criterion is unclear at this stage.◦ As set out against Objective 5, this option would generally have minor positive effects in the short and medium term for DMC19.◦ In relation to DMC21, the extent to which the supply of employment sites can support the delivery of carbon neutral employment alone is uncertain. Locating additional employment land at strategic growth locations at Avonmouth could increase the need to travel; however, this could be balanced by provision of employment uses as part of mixed use developments within Areas of Growth and Regeneration. There is no specific reference to low carbon sectors, and no reference within this option to improving digital connectivity.• The impacts of the key employment locations, IDAs and ASAs on the historic environment are broadly assessed against specific policies. However, at this stage, the effects of this employment land supply and distribution on the historic environment is unknown. Developments would be expected to be policy compliant with draft and retained policies for conserving and enhancing the historic environment.• The effects of this option on Objective 11 and 12 is complex. Whilst employment development would be expected to be policy compliant with draft and retained policies for nature conservation and provide a net gain in biodiversity, there are a number of proposed allocations present in SSSI impact zones, on priority habitats or on greenfield sites for which development would be directly negative or significantly negative effects. For allocations around the Avonmouth area, proximity to the national and international habitats associated with the River Severn and River Avon means that a Habitats Regulations Assessment will be needed to determine detailed effects and mitigation.• The effects of this option on Objectives 13, 14 and 17 are uncertain. Although there are a small number located beyond accepted walking distances, the majority of IDAs could encourage access to sustainable modes of transport (i.e. walking, cycling and public transport) and Areas of Growth and Regeneration are located generally where there is good access to sustainable transport. However, at Avonmouth, the effects are more uncertain, and for which the effects of major transport investment (such as the M49 junction upgrade) and proposed public transport improvements (such as MetroWest) will require more detailed assessment. The impact of all proposals would need to be supported by updated modelling to test the effects on highway network (DMC30) and implications on air quality.• Effects for Objective 15 are uncertain and complex. Employment uses are 'less vulnerable' development against the Flood Risk Vulnerability Classification, however as some sites are within Flood Risk Zone 3b, this could still result in minor negative and significant negative effects for this objective. In lower areas of flood risk, effects could be considered to be overall positive and represent an effective use of land within the city, subject to not increasing flood risks elsewhere.• Against SA Objectives 16 and 18, effects of this option are also unknown, as development proposals may enable opportunities to maximise site-level adaptations. However, this is also linked to the intensification of land use / development and the design of the wider scheme within which new workspace is proposed; and the extent to which other mitigation measures (within Policy CCS2) are enabled. The standard of sustainable design, energy efficiency and construction are unknown; and may not be consistently applied across a site or building level due to factors such as viability or site constraints. These objectives will be predominantly determined by implementation. | |
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5.2 Reasonable Alternatives for the Pre-Submission Publication Version Policies

Overview

Following the development of Strategic Options for the Local Plan Spatial Strategy, the next step is to establish the reasonable alternatives in respect of the policies for the Local Plan.

As explained within the introduction to the SA Framework, a number of policies within the currently adopted Local Plan are proposed to be taken forward subject to a number of minor changes (see Appendix 3 '*Assessing Changes to Retained Policies*'). Where minor changes would have no material impact on the assessment of effects, these policies are not proposed to be appraised again; in other cases, where it is unclear of the extent to which effects would be materially different, a high level appraisal of policies has been undertaken and set out in Appendix 3. New policies proposed through the Pre-Submission Publication Version Plan are evaluated against the SA Framework and appraised to understand whether reasonable alternatives exist.

Method and assumptions for identifying, defining and evaluating reasonable alternatives for detailed policies

Using the themes within the Bristol Local Plan Pre-Submission Publication Version (November 2023), policy options are detailed against the assessment of effects for each policy within **Appendix 3** *Assessing the effects of the Bristol Local Plan Pre-Submission Publication Version (November 2023) policies*.

As set out in **Section 5.1**, guidance indicates that alternatives are not needed for every plan issue or policy, and only where policy alternatives meet plan objectives and are credible based on available evidence. Indeed, the SA should only focus on what is required to assess the adverse or likely significant effects of the Plan, appropriate for the content and level of detail in the Plan⁸³.

For each policy theme within the Pre-Submission Publication Version, Appendix 3 sets out:

- The reason for focussing on a 'policy theme', noting the relevant existing plans and programmes which form the context for the policy followed by any suggested reasonable.
- Whether national planning policy mandated the need for a policy element, which limited the choice of reasonable alternatives. In these instances, recommendations will be made for monitoring the situation as the plan evolves.
- Where the evidence base limits the choice of reasonable alternatives at this stage.
- Whether a reasonable alternative has already been tested against the Sustainability Appraisal process through the currently adopted Local Plan, it is not proportionate to reappraise policies here.

Conclusions of these new policy reasonable alternatives are set out within **Appendix 3** *Assessing the effects of the Bristol Local Plan Pre-Submission Publication Version (November 2023) policies*.

⁸³ NPPG (2014) Paragraph: 009 Reference ID: 11-009-20140306.

5.3 Reasonable Alternatives for Site Allocations

Potential development sites were identified from the following sources:

- 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.

Given the overarching need to meet a minimum of 1,925 new homes across the Plan period, and the primacy of new and affordable homes as a core objective of the Local Plan, there was an overarching focus on sites that may be suitable for housing. Sites not allocated through the Local Plan, which have a supportive policy context, may otherwise come forward as large windfall sites. These have not been considered to be reasonable alternatives.

6. Predicting and evaluating the effects of the Local Plan policy options and site allocations (Stage B3)

6.1 Overview

The SEA directive requires that “*the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors*” be considered.

The purpose of this stage is to predict and evaluate the social, economic and environmental effects of the Bristol Local Plan Pre-Submission Publication Version (2023) policies as a whole. Policies and any reasonable alternative option have been appraised against the SA Framework in Section 3.4, and effects predicted based on requirements of SEA Regulations including the criteria of significance (i.e. duration, geographic scale, reversibility and any cumulative or synergistic effects) established in Section 3.5.

6.2 Method and assumptions for predicting and evaluating the effects of the Pre-Submission Publication Version

Matrices within **Appendix 3** *Assessing the effects of the Bristol Local Plan Pre-Submission Publication Version (November 2023) policies* and **Appendix 4** *Predicting and evaluating the effects of Site Allocations* set out an assessment of these effects against the ‘current situation’ in more detail, including providing an overview of informing assumptions and a commentary of the key findings.

Using the SA Framework as a guide, the assessment of the Local Plan Policies and associated recommendations in **Table 14** covers:

- Any adverse, significant adverse or beneficial effects of the policy in relation to the SA Framework or Local Plan Objectives.
- Building on the assessment undertaken within the Interim SA Report (2019), suggest amendments to address: where adverse effects of the policy could be mitigated or its severity reduced; where any beneficial effects can be maximised; where cross-referencing to other draft or adopted policies should be included; and any references to cross-boundary effects and associated mitigation.
- Where further justification of policy text, such as rationale behind inclusion within the Plan or the context for which the policy seeks to address, is necessary.
- The reasons for selecting the Preferred Approach in light of appraisal findings, alongside recommendations for mitigation will be subsequently outlined.

Site allocations were appraised against the framework set out within **Appendix 2** *Framework to inform the prediction and evaluation of the effects of Publication Version November 2023 Draft Local Plan Site Allocations (Task B3)*. This specifically applies to:

- Areas of Growth and Regeneration (**Appendix 3**, against Policies DS1 – 14) (summarised within **Table 14**);

- Site Allocations (Policy DA1) (**Appendix 4**) (summarised within **Table 15**);
- Industrial and Distribution Areas (Policy E4) (**Appendix 1**) (summarised within **Table 16**); and,
- Avonmouth Industrial Area and Bristol Port (Policy E5) (**Appendix 4**) (summarised within **Table 16**).

For both the assessment of policies and site allocations, the matrix or commentary is blank unless a potential effect is considered unlikely to be detectable.

Table 17 summarises the total impacts of the plan, both policies, Areas of Growth and Regeneration and site allocations.

6.3 Predicting the effects of the Bristol Local Plan Pre-Submission Publication Version (2023)

Table 14 Assessment of Appendix 3 Assessing the effects of the Bristol Local Plan Pre-Submission Publication Version (November 2023) policies

| | 1. To ensure an adequate and diverse supply of housing that is affordable to everyone | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land | 3. Ensure easy and affordable access to key services | 4. Increase participation in cultural and community activities | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | 6. To reduce health inequalities and promote healthy lifestyles across the city | 7. Ensure access to education and learning for all sections of society | 8. To support the economy and ensure that there are suitable opportunities for employment | 9. Ensure access to a range of shopping facilities for all sections of society | 10. To ensure the conservation and enhancement of local character including landscape features and the historic environment and its setting | 11. To ensure the conservation and enhancement of biological and geological assets and improve the quality of wildlife habitats | 12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation | 13. To encourage a demonstrable modal shift and reduce the need to travel | 14. To maintain and improve the existing highway network | 15. To reduce the risk of flooding from all sources | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | 17. Minimise air and noise pollution | 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 |
|--|---|---|--|--|---|---|--|---|--|---|---|---|---|--|---|--|--------------------------------------|--|
| DS1 Bristol City Centre | ++ | ++/? | ++/? | +/? | ++/? | -/? | ++/? | +/? | ++/? | -/? | -/? | +/? | +/? | +/? | --/? | ? | -/? | +/? |
| DS1A Bristol City Centre – Broadmead, Castle Park and the Old City | ++/? | ++/? | ++ | ++ | ++/? | -/? | -/? | +/? | ++ | ? | +/? | +/? | +/? | -/? | --/? | ? | -/? | +/? |
| DS2 Bristol Temple Quarter | ++/? | ++/? | ++/? | +/? | ++/? | -/? | ++/? | +/? | +/? | --/? | -/? | +/? | ++/? | +/? | --/? | ? | -/? | +/? |
| DS3 St Philip’s Marsh | ++/? | ++/? | +/? | ? | ++/? | 0/? | +/? | +/? | +/? | 0/? | -/? | +/? | +/? | +/? | -/? | ? | -/? | +/? |
| DS4 Western Harbour | ++/? | +/? | +/? | +/? | +/? | -/? | +/? | +/? | +/? | --/? | --/? | +/? | +/? | +/? | +/? | ? | -/? | +/? |
| DS5 Frome Gateway | ++/? | +/? | +/? | +/? | ++/? | -/? | +/? | +/? | +/? | 0 | ? | +/? | +/? | +/? | --/? | ? | -/? | +/? |
| DS6 Lawrence Hill | ++/? | +/? | +/? | +/? | ++/? | -/? | +/? | +/? | +/? | 0/? | -/? | +/? | +/? | +/? | 0/? | ? | -/? | +/? |
| DS7 Central Fishponds | ++/? | ++/? | ++/? | +/? | +/? | ? | +/? | +/? | +/? | ? | -/? | +/? | +/? | +/? | 0/? | ? | -/? | ? |
| DS8 Central Bedminster | ++/? | ++/? | ++/? | +/? | ++/? | -/? | +/? | +/? | +/? | -/? | -/? | +/? | +/? | +/? | -/? | ? | -/? | +/? |
| DS9 Brislington | ++/? | ++/? | +/? | ? | ++/? | -/? | +/? | +/? | +/? | ? | -/? | +/? | +/? | +/? | ? | ? | -/? | ? |
| DS11 Development allocations – southwest Bristol | ++/? | --/? | ? | ? | +/? | ? | +/? | ? | ? | ? | ? | ? | ? | ? | -/? | ? | ? | +/? |
| DS12 New neighbourhood – Bath Road, Brislington | ++/? | --/? | +/? | ? | ++/? | 0/? | + | 0/? | +/? | ? | -/? | +/? | +/? | +/? | ? | ? | ? | ? |
| DS13 Lockleaze | ++/? | ? | +/? | ? | ++/? | +/? | +/? | +/? | +/? | ? | -/? | +/? | +/? | +/? | ? | ? | +/? | ? |
| DS14 Central Southmead | ++/? | ? | +/? | ++/? | ++/? | ? | +/? | -/? | +/? | 0 | -/? | ? | +/? | +/? | 0/? | ? | +/? | ? |
| IDC1 Development contributions and CIL | n/a | n/a | +/? | +/? | +/? | +/? | +/? | +/? | +/? | ? | ? | ? | +/? | +/? | +/? | ? | ? | ? |
| SV1 Social value and inclusion | n/a | n/a | n/a | + | + | + | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | + |
| UL1 Effective and efficient use of land | +/? | ++ | +/? | n/a | +/? | ? | ? | + | +/? | +/? | ? | ? | +/? | ? | ? | ? | ? | ? |
| UL2 Residential densities | +/? | ++/? | ? | n/a | +/? | ? | ? | n/a | ? | +/? | ? | ? | +/? | ? | ? | ? | ? | ? |
| AH1 Affordable housing provision | ++/? | ? | n/a | n/a | ++/? | +/? | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| H2 Preventing the loss of residential accommodation | + | +/? | n/a | 0/? | 0/? | +/? | 0/? | n/a | n/a | n/a | n/a | n/a | 0/? | 0/? | 0/? | 0/? | n/a | n/a |
| H4 Housing type and mix | ++/? | +/? | +/? | n/a | +/? | +/? | +/? | +/? | +/? | 0/? | n/a | n/a | ? | ? | n/a | n/a | n/a | n/a |
| H5 Self-build and community-led housing | ++/? | -/? | ? | ? | 0/? | ? | ? | -/? | ? | ? | -/? | -/? | ? | ? | ? | n/a | n/a | n/a |
| H6 Houses in multiple occupation and other shared housing | +/? | ? | n/a | n/a | n/a | ? | n/a | n/a | n/a | +/? | ? | ? | n/a | +/? | ? | ? | ? | ? |
| H7 Managing the development of purpose-built student accommodation | ++/? | +/? | ? | n/a | n/a | ? | ? | n/a | ? | ? | ? | ? | +/? | n/a | ? | ? | ? | ? |
| H8 Older people’s and other specialist needs housing | ++/? | ? | +/? | n/a | n/a | +/? | n/a | n/a | +/? | ? | ? | ? | +/? | n/a | ? | ? | ? | ? |
| BTR1 Build to Rent housing | +/? | ? | ? | n/a | +/? | +/? | n/a | n/a | n/a | ? | ? | ? | ? | ? | ? | ? | ? | ? |
| H9 Accessible homes | +/? | n/a | n/a | n/a | n/a | ? | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| H10 Planning for traveller sites | +/? | ? | + | n/a | n/a | ? | n/a | n/a | n/a | ? | ? | ? | n/a | n/a | ? | ? | ? | ? |
| E1 Inclusive economic development | ? | n/a | n/a | n/a | ++/? | n/a | +/? | +/? | n/a | n/a | n/a | n/a | ? | n/a | n/a | n/a | n/a | ? |
| E2A New workspace within mixed use development | 0/? | ++/? | ? | ? | ? | ? | n/a | +/? | n/a | ? | ? | ? | ? | 0/? | ? | ? | ? | ? |
| E3 Location of office development | n/a | +/? | +/? | n/a | +/? | ? | n/a | +/? | +/? | ? | ? | ? | ? | ? | ? | ? | ? | ? |
| E4 Industry and Distribution Areas | n/a | ++/? | +/? | +/? | +/? | ? | +/? | +/? | +/? | ? | ? | ? | +/? | ? | -/? | ? | -/? | ? |
| E5 Avonmouth Industrial Area and Bristol Port | n/a | -/? | n/a | n/a | +/? | ? | n/a | ++/? | n/a | -/? | --/? | ? | ? | ? | --/? | ? | 0/? | +/? |
| E6 Affordable workspace | n/a | n/a | n/a | + | + | n/a | n/a | + | n/a | + | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| E8 Digital connectivity and inclusion | 0/? | 0/? | +/? | +/? | +/? | n/a | n/a | +/? | n/a | ? | ? | ? | n/a | n/a | n/a | n/a | n/a | n/a |
| SSE1 Supporting Bristol’s Centres - network and hierarchy | + | + | ++ | + | + | + | n/a | + | ++ | ? | n/a | n/a | +/? | n/a | n/a | n/a | +/? | n/a |
| SSE2 Development in Bristol’s centres | +/? | + | ++ | + | + | + | n/a | + | ++ | ? | n/a | n/a | +/? | n/a | n/a | n/a | + | n/a |
| SSE3 Supporting Bristol’s evening, night-time and culture economy | ? | + | + | + | + | + | n/a | + | n/a | ? | n/a | n/a | +/? | n/a | n/a | n/a | + | n/a |
| SSE4 Town centre first approach to development | n/a | + | ++ | + | + | + | n/a | + | ++ | ? | n/a | n/a | +/? | n/a | n/a | n/a | + | n/a |
| SSE5 Temporary uses in centres | n/a | ++ | n/a | + | +/? | + | n/a | +/? | ++ | + | n/a | n/a | +/? | n/a | n/a | n/a | + | n/a |
| SSE6 Retaining and enhancing markets | n/a | n/a | n/a | + | + | + | n/a | + | ++ | + | n/a | n/a | +/? | n/a | n/a | n/a | + | n/a |
| SSE7 Provision of public toilets | n/a | n/a | + | + | n/a | + | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| BG1 Green Infrastructure and biodiversity in new development | -/? | n/a | +/? | n/a | +/? | + | n/a | -/? | n/a | +/? | ++ | ++ | +/? | n/a | + | + | + | + |
| BG2 Nature Conservation and Recovery | -/? | n/a | n/a | n/a | +/? | + | n/a | -/? | n/a | +/? | ++ | ++ | n/a | n/a | + | + | + | + |
| BG3 Achieving Biodiversity Gains | -/? | n/a | n/a | n/a | +/? | + | n/a | -/? | n/a | +/? | ++ | +/? | n/a | n/a | + | + | + | + |
| BG4 Trees | -/? | n/a | n/a | n/a | +/? | + | n/a | -/? | n/a | +/? | ++ | +/? | n/a | n/a | ++ | n/a | ++ | ++ |
| BG5 Biodiversity and access to Bristol’s waterways | -/? | n/a | +/? | n/a | +/? | + | n/a | -/? | n/a | +/? | ++/? | ++ | +/? | n/a | ++ | ++ | n/a | ++ |
| G11 Local Green Space | - | + | n/a | + | n/a | + | n/a | - | n/a | + | + | + | n/a | n/a | +/? | +/? | + | + |

| | 1.To ensure an adequate and diverse supply of housing that is affordable to everyone | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land | 3. Ensure easy and affordable access to key services | 4. Increase participation in cultural and community activities | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | 6. To reduce health inequalities and promote healthy lifestyles across the city | 7. Ensure access to education and learning for all sections of society | 8. To support the economy and ensure that there are suitable opportunities for employment | 9. Ensure access to a range of shopping facilities for all sections of society | 10. To ensure the conservation and enhancement of local character including landscape features and the historic environment and its setting | 11. To ensure the conservation and enhancement of biological and geological assets and improve the quality of wildlife habitats | 12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation | 13. To encourage a demonstrable modal shift and reduce the need to travel | 14. To maintain and improve the existing highway network | 15. To reduce the risk of flooding from all sources | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | 17. Minimise air and noise pollution | 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 |
|---|--|---|--|--|---|---|--|---|--|---|---|---|---|--|---|--|--------------------------------------|--|
| GI2 Reserved Open Green Space | 0/? | +/? | n/a | +/? | n/a | + | n/a | 0/? | n/a | +/? | +/? | +/? | n/a | n/a | +/? | +/? | +/? | +/? |
| GI3 Incidental Open Spaces | n/a | n/a | n/a | n/a | n/a | +/? | n/a | n/a | n/a | +/? | +/? | +/? | n/a | n/a | +/? | n/a | +/? | +/? |
| T1 Development and transport policies | 0/? | +/? | +/? | n/a | +/? | ++/? | +/? | +/? | +/? | ? | ? | ? | ++/? | +/? | n/a | ? | ? | ? |
| T2 Transport infrastructure improvements | n/a | n/a | n/a | n/a | +/? | ++ | +/? | +/? | +/? | +/? | +/? | ? | ++ | +/? | n/a | n/a | ++/? | n/a |
| T2A Protected transport and movement routes | n/a | n/a | n/a | n/a | +/? | ? | n/a | +/? | +/? | ? | ? | ? | ? | ++/? | n/a | n/a | ? | n/a |
| T4A Parking, servicing and the provision of infrastructure for electric vehicles | n/a | n/a | n/a | n/a | +/? | +/? | n/a | +/? | +/? | ? | ? | ? | +/? | n/a | n/a | n/a | +/? | n/a |
| T6 Active travel routes | n/a | n/a | n/a | n/a | +/? | +/? | +/? | +/? | +/? | +/? | +/? | ? | ++/? | +/? | n/a | n/a | +/? | n/a |
| NZC1 Climate change, sustainable design and construction | + | 0/? | n/a | n/a | +/? | +/? | n/a | +/? | n/a | ? | n/a | n/a | +/? | n/a | n/a | +/? | +/? | +/? |
| NZC2 Net zero carbon development – operational carbon | -/? | 0/? | n/a | ? | ? | 0/? | ? | +/? | n/a | ? | n/a | n/a | n/a | n/a | n/a | +/? | +/? | + |
| NZC3 Embodied carbon, materials and circular economy | ? | + | n/a | n/a | +/? | n/a | n/a | +/? | n/a | +/? | n/a | n/a | n/a | n/a | n/a | ++ | + | ++ |
| NZC4 Adaptation to a changing climate | -/? | n/a | n/a | n/a | +/? | + | n/a | ? | n/a | ? | +/? | +/? | n/a | n/a | +/? | ++ | +/? | +/? |
| NZC5 Renewable energy development | n/a | 0/? | n/a | n/a | n/a | + | n/a | ? | n/a | ? | ? | ? | ? | n/a | ? | +/? | +/? | ++ |
| FR2 Bristol Avon Flood Strategy | -/? | n/a | n/a | n/a | n/a | n/a | n/a | -/? | n/a | -/? | 0/? | + | +/? | n/a | ++ | + | n/a | + |
| DPM1 Delivering well-designed, inclusive places | +/? | + | +/? | + | +/? | + | n/a | 0/? | +/? | + | + | +/? | + | n/a | ? | + | + | + |
| DC1 Liveability in residential development including space standards and private outdoor space | +/? | +/? | n/a | n/a | +/? | +/? | n/a | n/a | n/a | ? | ? | +/? | n/a | n/a | ? | ? | ? | ? |
| DC2 Tall buildings | +/? | +/? | +/? | n/a | +/? | ? | ? | +/? | +/? | 0/? | ? | ? | +/? | ? | ? | ? | ? | ? |
| AD1 Advertisements | n/a | n/a | n/a | n/a | n/a | + | n/a | ? | n/a | + | n/a | n/a | n/a | n/a | n/a | n/a | + | n/a |
| HW1 Pollution control and water quality | 0/? | 0/? | n/a | +/? | +/? | + | n/a | +/? | n/a | n/a | + | + | ? | ? | 0 | + | +/? | +/? |
| HW2 Air quality | 0/? | 0/? | +/? | n/a | +/? | +/? | +/? | +/? | +/? | ? | ? | ? | +/? | + | n/a | +/? | + | +/? |
| HW3 Takeaways | n/a | n/a | n/a | n/a | n/a | + | n/a | n/a | +/? | ? | ? | ? | -/? | n/a | n/a | -/? | ? | ? |
| FS1 The provision of allotments | n/a | n/a | n/a | + | +/? | + | n/a | n/a | n/a | ? | + | + | +/? | n/a | + | + | +/? | + |
| FS2 Provision of food growing space in new developments | n/a | n/a | n/a | + | +/? | + | n/a | n/a | n/a | ? | + | + | +/? | n/a | + | + | + | + |
| FS3 The protection of existing food growing enterprises and allotments | n/a | + | n/a | n/a | +/? | + | n/a | + | n/a | +/? | +/? | +/? | +/? | n/a | + | + | + | + |

Table 15 Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Site Allocations against Appendix 2 Framework to inform the prediction and evaluation of the effects

| | | 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 | DMC 7 | DMC 8 | DMC9 | DMC10 | DMC11 | DMC12 | DMC13 | DMC14 | DMC15 | DMC16 | DMC17 | DMC18 | DMC19 | DMC20 | DMC21 | DMC22 | DMC23 | DMC24 | DMC25 | DMC26 | DMC27 | DMC28 | DMC29 | DMC30 | DMC31 | DMC 32 | DMC33 | DMC34 | DMC35 | DMC36 | DMC37 | DMC38 | DMC39 | DMC40 | DMC41 | DMC42 | |
| KS10 / BDA0802 | Redcliffe Way | + | ? | 0 | 0 | ++ | ++ | 0 | ++ | ? | ++ | ++ | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | -/? | ? | +/? | ++ | ++/? | -/? | +/? | -/? | ? | 0 | 0 | 0 | 0 | - | ? | ? | + | ? |
| BDA0103 | Land at Cheltenham Road / Bath Buildings, Montpelier | + | + | 0 | 0 | + | + | 0 | ++ | ? | ++ | ++ | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA0105 | Land to the rear of 64-68 Stokes Croft, St. Paul's | + | + | 0 | 0 | + | ++ | 0 | ++ | ? | ++ | ++ | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | + | ? |
| BDA0302 | Land to West of Ashton Gate Stadium, Marsh Road / Winterstoke Road | ? | ? | 0 | 0 | ++ | + | 0 | ++ | ? | 0 | 0 | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | +/? | + | ++/? | -/? | +/? | -- | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA0303 | Former Ashton Sidings 'City Gateway', Ashton | + | + | 0 | 0 | - | + | - | ++ | ? | + | + | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | -/? | ? | +/? | + | ++/? | -/? | +/? | +/? | ? | 0 | 0 | 0 | 0 | - | ? | ? | + | ? |
| BDA0304 | 1-25 Bedminster Down Road, Parson Street | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | - | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA0305 | 233-237 West Street, Bedminster | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | - | ++ | ++ | +/? | - | | | | | | | + | + | 0 | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA0401 | Land at Gloucester Road / Merton Road, Horfield | + | + | 0 | 0 | ++ | + | 0 | ++ | ? | 0 | 0 | - | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA0601 | Land at Latimer Close, Brislington | + | + | 0 | 0 | - | + | - | ++ | ? | + | + | 0 | ++ | ++ | +/? | - | | | | | | | + | + | 0 | -/? | ? | +/? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | +/? | 0 | ? | ? | ? | ? |
| BDA0702 | Land at Marmalade Lane (south), Brislington | + | + | 0 | 0 | -- | + | - | ++ | ? | 0 | 0 | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | -/? | ? | +/? | + | ++/? | -/? | +/? | +/? | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA0703 | Land at Marmalade Lane (north), Brislington | + | + | 0 | 0 | - | + | - | ++ | ? | 0 | 0 | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | -/? | ? | +/? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | +/? | 0 | ? | ? | ? | ? |
| BDA0901 | 2-16 Clifton Down Road | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1001 | Land west of Hampton Lane, Clifton Down | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1002 | Land at Whiteladies Gate, Clifton Down | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | - | ++ | + | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1003 | Land adjacent Alma Vale Road and Alma Court | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1004 | Barley House, Oakfield Grove | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | 0 | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1101 | Land at Gibson Road | + | + | 0 | 0 | ++ | + | 0 | ++ | ? | 0 | 0 | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1102 | Land at Sydenham Lane | + | + | 0 | 0 | + | + | 0 | ++ | ? | + | + | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1201 | 16-20 Fishponds Road, Easton | + | + | 0 | 0 | + | + | 0 | ++ | ? | ++ | ++ | - | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | +/? | ++ | ++/? | -/? | +/? | -/? | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1301 | Stapleton Cricket Club | + | + | ++ | ++ | -- | 0 | - | + | ? | 0 | 0 | - | ++ | ++ | +/? | + | | | | | | | + | + | +/? | -/? | ? | +/? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1302 | Land south of Rose Green Close, Eastville | + | + | 0 | 0 | + | + | - | + | ? | + | + | 0 | ++ | ++ | +/? | + | | | | | | | 0 | 0 | 0 | -/? | ? | +/? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1303 | Land at Hendys Yard, Lower Grove Road | + | + | 0 | 0 | + | + | 0 | ++ | ? | ++ | ++ | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | +/? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1304 | Land to the rear of Rose Green Road, Eastville | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | 0 | ++ | ++ | +/? | + | | | | | | | 0 | 0 | 0 | -/? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1305 | 525 Stapleton Road, Fishponds | + | + | 0 | 0 | + | + | 0 | ++ | ? | + | + | - | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | +/? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA1401 | Land at Hartcliffe Way | + | + | 0 | 0 | ++ | + | 0 | ++ | ? | ++ | ++ | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | +/? | ++ | ++/? | -/? | +/? | +/? | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1402 | Land at Nover's Hill | + | + | 0 | 0 | ++ | + | 0 | ++ | ? | ++ | ++ | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | -/? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1501 | Land at College Road, Fishponds | + | + | ++ | ++ | - | 0 | - | ++ | ? | + | + | 0 | ++ | ++ | +/? | + | | | | | | | + | + | +/? | -/? | ? | +/? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1601 | Land to the rear of 96 Church Road/ Orchard Drive, Bishopsworth | + | + | 0 | 0 | + | + | 0 | ++ | ? | ++ | ++ | 0 | ++ | ++ | +/? | + | | | | | | | + | + | +/? | ? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1702 | 14 Wyck Beck Road, Brentry | + | + | 0 | 0 | + | + | 0 | ++ | ? | ++ | ++ | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA1901 | Land at the corner of Lodge Causeway / Berkeley Road, Fishponds | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA2001 | 3 Kelston Road | + | + | 0 | 0 | + | + | 0 | ++ | ? | 0 | 0 | 0 | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | ? | + | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA2301 | Land to the south of Warwick Road / Oxford Place, Easton | + | + | 0 | 0 | + | + | 0 | ++ | ? | ++ | ++ | - | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA2302 | Former Barton Hill Nursery School, Queen Ann Road, St Philips | + | + | 0 | 0 | + | + | 0 | ++ | ? | + | + | - | ++ | ++ | +/? | + | | | | | | | + | + | 0 | ? | ? | ? | ++ | ++/? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA2501 | 33 Zetland Road, | + | + | 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 | ? | ? | ? | ? |

| | | 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 | DMC 7 | DMC 8 | DMC9 | DMC10 | DMC11 | DMC12 | DMC13 | DMC14 | DMC15 | DMC16 | DMC17 | DMC18 | DMC19 | DMC20 | DMC21 | DMC22 | DMC23 | DMC24 | DMC25 | DMC26 | DMC27 | DMC28 | DMC29 | DMC30 | DMC31 | DMC 32 | DMC33 | DMC34 | DMC35 | DMC36 | DMC37 | DMC38 | DMC39 | DMC40 | DMC41 | DMC42 |
| BDA2601 | Land at Two Mile Hill Road / Charlton Road, St George | + | + | 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 | ? | ? | ? | ? |
| BDA2603 | Land at Two Mile Hill Road / Waters Road, St George | + | + | 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 | ? | ? | ? | ? |
| BDA2702 | Land at corner of Bryants Hill and Furber Road, St George | + | + | 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 | ? | ? | ? | ? |
| BDA2801 | Land to the south of Blackswarth Road, Avonview | + | + | 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 | - | ? | ? | ? | ? |
| BDA2803 | 222-232 Church Road, St. George | + | + | 0 | 0 | + | + | 0 | ++ | ? | ++ | ++ | - | ++ | ++ | +/? | + | | | | | | + | + | 0 | -/? | ? | ? | + | ++ / ? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | - | ? | ? | ? | ? |
| BDA2901 | Land at Lanercost Road | + | + | ++ | 0 | -- | + | - | ++ | ? | + | + | 0 | ++ | ++ | +/? | + | | | | | | + | + | 0 | ? | ? | ? | + | ++ / ? | -/? | +/? | ++ | ? | 0 | 0 | 0 | 0 | 0 | ? | ? | ? | ? |
| BDA2902 | Works at Felstead Rd | + | + | 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 | ? | ? | ? | ? |
| BDA3101 | Greville EPH, Lacey Road, Stockwood | + | + | 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 | ? | ? | ? | ? |
| BDA3401 | 122 Bath Road, Totterdown, Bristol | + | + | 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 | - | ? | ? | + | ? |
| BDA2401 | Bridge Farm, Land at South Hayes, Lockleaze | + | + | ++ | ++ | -- | + | - | + | ? | 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 | ? | ? | ? | ? |
| BDA2102 / CFS23001 | Maritime Heritage Centre Public Car Park, Gas Ferry Road, Bristol, BS1 6JL | + | ? | 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 | - | ? | ? | + | ? |
| 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 | ? | ? | ? | ? |

Table 16 Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Industrial and Distribution Areas, Maritime Industrial and Warehousing Areas and Avonmouth Site Allocations Sites (Task B3) against Appendix 2 Framework to inform the prediction and evaluation of the effects

| | | 1 | | | | 2 | | 3 | 4 | 5 | | 6 | | 7 | 8 | | | | | 9 | | 10 | 11 | | 12 | 13 | | 14 | | 15 | | 16 | | | | 17 | 18 | | | | | | |
|----------|---|-------|-------|-------|-------|-------|-------|------|------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|--------|-------|-------|--------|--------|--------|-------|--------|-------|-------|--------|-------|-------|-------|-------|-------|--------|
| Site Ref | Site Name | DMC 1 | DMC 2 | DMC 3 | DMC 4 | DMC 5 | DMC 6 | DMC7 | DMC8 | DMC9 | DMC10 | DMC11 | DMC12 | DMC13 | DMC14 | DMC15 | DMC16 | DMC17 | DMC18 | DMC19 | DMC20 | DMC21 | DMC22 | DMC23 | DMC24 | DMC25 | DMC 26 | DMC27 | DMC28 | DMC 29 | DMC 30 | DMC 31 | DMC32 | DMC 33 | DMC34 | DMC35 | DMC 36 | DMC37 | DMC38 | DMC39 | DMC40 | DMC41 | 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 | ? | ? | ? | ? |

Table 17 Predicting the Total Plan Effects

| SEA Topic | Sub-Topic and Total Plan Impacts |
|-----------------------------------|---|
| Population, housing and community | Housing supply (Objective 1 and 2) |
| | <p>A core objective of the Local Plan is the delivery of new and affordable housing. This is evident through the housing target to deliver at least 34,700 new and affordable homes by 2040, and for this to be exceeded where this is supported by service and infrastructure capacity. However, it is recognised that in spite of the plan's overarching focus on homes, local housing need detailed within the ORS (2023) Local Housing Needs Assessment is not met within the LPA authority and indeed unmet need will be required to be met with adjacent authority boundaries. Whilst the overall effect is significant positive against this objective, the appraisal is also uncertain.</p> <p>The preferred approach for the Local Plan's development strategy is based a range of sources of supply, including completions, commitments, retained allocations, proposed site allocations, urban potential and small sites windfall, efficient use of land realised through urban potential and some limited Green Belt release. Whilst the Local Plan does encourage efficient use of under-used land and previously developed land across the city, there are negative effects associated with the loss of both Green Belt and greenfield land. On balance, the combination of AGRs, proposed and retained site allocations and emphasis on urban potential and small site windfall supply, in combination with Tall Buildings (Policy DC2) and Effective and Efficient Use of Land (Policy UL1) policies, have significant potential to boost housing supply while optimising density and making best use of land, including through a variety of housing types.</p> <p>Policies H5 – H10, in respect of student accommodation, self-build and community-led housing groups, HMOs, older persons' housing, accessible homes, build to rent and travellers, will ensure a range of house types and sites to support needs of different communities and residents of the City. The quality of housing is ensured through climate change policies on sustainable design and construction, and design and conservation policies related to high quality design and minimum space standards.</p> <p>Policy E1 Inclusive economic development, Policy E2a New workspace within mixed use development, Policy E8 Digital Connectivity and Inclusion, alongside the climate change and biodiversity policies do have the potential to place viability burdens on housing delivery, which may have neutral or uncertain effects.</p> |
| | Community activities and key services (Objective 3 and 4) |
| Health and inequalities | <p>Emphasis on Urban Living and maximising the efficient use of land through urban potential is considered to indirectly increase the number of homes within easy access to key services and community facilities available within the city. Some of the Development Strategy (DS) policies include place principles that require provision of additional retail development, cultural or community facilities (DS1 – DS8) and as such, provide positive effects for this theme. However, as there are some site allocations which are located beyond easy walking distance of key services, or some DS Policies are silent on provision (DS9 – DS13), the effect is not considered to be significant positive overall.</p> <p>Policies SSE1-SSE6 would ensure that shopping, leisure and night time economy uses as well as traditional retail uses such as markets are retained in the most sustainable locations promoting a 'town centre first' approach in accordance with the settlement hierarchy. There is, however, a limit to the scope of policies related to centres, shopping, and the evening economy, as a result of changes to the use classes order and the General Permitted Development Order allowing conversion of Class E uses to residential (with the Prior Approval of the Local Planning Authority) which may result in negative effects, although these remain unknown.</p> |
| | Reducing inequality for those living in areas of concentrated disadvantage (Objective 5) and ensuring access to education (Objective 7) |
| | <p>The Plan could help to reduce inequalities through the provision of more affordable and a balanced mix of housing (Policies AH1, H4), protecting strategic employment sites and supporting opportunities for affordable workspace (E2, E4 and E5), opportunities for local training and employment (Policy E1), active travel infrastructure and better transport (T1, T2 and T6). The Plan's focus on good housing design including through energy and water efficiency requirements, should reduce operating costs, which could help alleviate issues of fuel or food poverty.</p> <p>Whilst some draft site allocations, IDAs and AGRs are located in areas of high deprivation, and therefore offer clear opportunities for regeneration and investment in deprived areas; the effects of these policies will be subject to implementation, including delivery of affordable housing, access to employment / educational facilities and whether Draft Policy EI <i>Inclusive Economic Development</i> applies.</p> <p>By encouraging efficient use of land and concentrating development within sustainable locations, both policies and site allocations largely ensure that educational services are located within easy walking distance</p> |

| SEA Topic | Sub-Topic and Total Plan Impacts |
|------------------------|--|
| | <p>of development. The development of new university campus for University of Bristol is referenced in Policy DS2 which is considered to generate significant positive effects for this higher educational establishment. Defined locations for purpose-built accommodation could attract prospective students and foster sense of community amongst students.</p> <p>However, no references are made to other educational establishments within AGRs or training centres, nor do policies or draft allocations specifically require socially inclusive facilities. Total effects for education are also partly unknown as these are partially linked to the extent of developer contributions under Policy IDC1. While it is unknown at this stage, it is anticipated that provision would match delivery of housing development through AGRs and other sites within the plan area.</p> |
| | <p>Healthy lifestyles (Objective 6)</p> <p>Increased housing provision delivered through the Local Plan could help to alleviate current sustainability issues of poor affordability, homelessness and overcrowding, where all housing intended for permanent or longer-term occupation (Policy DC1) is required to be delivered in accordance with quality space standards. Site allocations alongside housing and design policies (Policies DC1 – DC3) also focus on the overall quality of homes, which is considered to potentially benefit public health, particularly where housing is delivered in areas of high deprivation.</p> <p>In addition, allocating AGRs within areas of higher accessibility to the City Centre’s health services and leisure opportunities offers potential for reduced private car travel, improved walkability and access to critical health infrastructure (Policy UL1 and UL2). Policies that encourage uptake of cycling and active travel also contribute to positive effects for health (Policy T6).</p> <p>Protection of the city’s valued green spaces (Policy GI1A – 4), including allotment and food-growing land (Policies FS1-FS3), is also conducive to good public health for recreation, health and well-being, as well as for their role in off-setting localised effects of climate change (e.g. flooding, urban heat island effects), and improving air quality. The combination of requiring private outdoor space (Policy DC1) and safeguarding other open spaces (Policy GI1 and GI2) could ensure access to spaces which ensure that the City is open to older people, students and young children alike.</p> <p>The Plan also includes policies that may result in behavioural change resulting in positive effects on health and wellbeing (Policies FS1-FS3, Policy HW3 and Policy AD1) although effects are likely to be realised over the long term and challenging to quantify.</p> <p>Overall whilst the Plan includes policies that would help support healthy lifestyles, given that several of the AGRs and the majority of site allocations are located in an Air Quality Management Area (AQMA) or a cumulative impact zone, a significant proportion of the future communities and new population could risk higher exposure to nitrous dioxide and particulate matter in the absence of mitigation.</p> |
| Economy and employment | <p>Strategic employment (Objective 8)</p> <p>Following the direction set out in the Local Plan, the overall strategy of the Local Plan (Policy E2) is to focus growth in the city centre, the Temple Quarter Enterprise Zone (TQEZ) town, district and local centres (Policy DS2, DS3 and E3) and Avonmouth Severnside Enterprise Area (ASEA) (Policy E5). Elsewhere, employment uses would be concentrated efficiently on new Industrial and Distribution Areas (IDAs) (Policy E4) and new workspaces within mixed use developments (Policy E2A). The Bristol Port is identified as a strategic infrastructure employment location (Policy E5). In protecting these key areas, the Local Plan aligns with the Local Industrial Strategy’s ambitions for economic and specific sectoral growth. This approach aligns with the objective of the Plan to ‘enable the sustainable growth of our economy for everyone, with modern workplaces and digital infrastructure fit for the future’.</p> <p>As underused land within IDAs can be used for community -led housing exception sites (Policy H5), community facilities (Policy E4) and indeed homes are proposed on former PIWA sites (Policy H1), the extent to which the Local Plan will regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment is uncertain. This is a particular issue on the basis that – despite Policy E2 setting out requirements of employment uses by floorspace and Policy E2A requiring the provision of workspace within sites and premises currently or recently used for business, industry or distribution – the Local Plan is not able to meet the replacement or additional forecast needs for office or industrial floorspace noted in the ELS (2019) nor the undersupply detailed in the ELSNA (2021).</p> <p>There is a risk that with a Local Plan-led objective of the delivery of housing, that there could be conflict with enabling increased job density, due to potential loss of vacant PIWA sites or land in former employment uses for housing development. Although the major employment sites would continue to be protected, there is an increased risk since the Interim SA Report (2019) that this overall strategy may result in incremental loss of the city’s available future employment land. Given there is national policy support for the efficient use of</p> |

| SEA Topic | Sub-Topic and Total Plan Impacts |
|-------------------------|--|
| | employment land, mitigation could look to include a requirement for 'net gain' or 'no net loss' of employment/ FTE jobs and monitoring of such a requirement. |
| | Digital connectivity and zero-carbon employment spaces (Objective 8) |
| | <p>Local Plan objectives promote development of modern workspaces and digital infrastructure in alignment with readily available technologies (Policy E8). Subject to affordability and the distribution of superfast broadband or full fibre connectivity roll-out, this could support inclusive and sustainable economic growth of the city and enable alternative working patterns that may be embraced post-Covid-19 pandemic.</p> <p>The ability to deliver zero-carbon employment spaces will be subject to implementation and other policies (Climate Change and Transport).</p> |
| Townscape and landscape | Historic environment, townscape, and landscapes (Objective 10) |
| | <p>Housing and employment development, alongside infrastructure delivery, may have effects on the historic environment if these do not conserve or enhance the designated heritage assets, townscape or landscape, as required by legislation⁸⁴, Publication Version policies and existing adopted policies.</p> <p>The Local Plan objective to have a minimum housing target, and an aspiration that this will be exceeded without an overall cap on the number of units, may result in significant and unknown impacts upon historic townscape and urban landscape of the City Centre in particular (Policy H1). Where this includes tall buildings, Policy DC2 does however require these to not have harmful impacts on inappropriate visual impacts over a wider area.</p> <p>While the majority of AGRs are not located in proximity to heritage assets, some are proposed in sensitive historic environments or adjacent to the designated heritage assets of the highest significance (Policy DS2 and DS4). Subject to the scale of development and mitigation, this may create significant negative impacts in some locations. While design and conservation policies require that regard is had for the historic environment, the overall effect is uncertain and subject to implementation.</p> <p>This will require provision of further evidence of site effects at an individual site, character and townscape / landscape level and how these could be mitigated.</p> |
| | Biodiversity and landscape (Objective 11) |
| | <p>The Plan seeks to protect a hierarchy of statutory sites and local wildlife corridors, with the majority of AGRs being located outside of designated sites. However, there are some instances where proposed development boundaries overlap with these ecological designations (i.e. Policy DS4 Western Harbour and Policy E4 Avonmouth Industrial Area and Bristol Port). Indeed, at Avonmouth, the development of four employment allocations on greenfield spaces, and site allocations on previously developed, vacant land, could have negative implications on the international ecological designations and habitats along the River Severn and Avon. Likely significant effects have also been identified for the Avon Gorge SAC; both aspects are being given further consideration through a Habitat Regulation Assessment.</p> <p>Although the HRA is subject to separate reporting, these effects may be mitigated through new development complying with Local Plan policies BG1 to BG5. Policy BG2 sets out the hierarchy of designated sites and levels of protection, whilst Policy BG3 transposes the requirements of the Environment Act into Local Plan policy by requiring non-exempt develop to delivery a minimum 10% biodiversity net gain. Policy BG1 promotes the achievement of a minimum Urban Greening Factor target for major developments.</p> <p>Overall, the effects are uncertain and subject to implementation. In addition, there is the potential for the costs of delivering the requirements of biodiversity and nature recovery to have negative effects on housing delivery, but these are unknown at this stage.</p> |
| | Green and Blue Infrastructure (Objective 12) |
| | <p>The Plan introduces a greater level of protection of green spaces through Local Green Space policy (Policy GI1 and GI4), of which 11.2% of the city is designated as, while ensuring protection of a significant proportion of the remaining city's green infrastructure (GI) as reserved or incidental open space (amounting to 5.6% of the total plan area) (Policy GI2 and 3). Limited reference is made to the provision of blue infrastructure in Policy BG1, BG2 and NZC4.</p> <p>The importance of achieving net gains for biodiversity, food growing, and recreational green space is highlighted within the Plan, with potential to bring multiple positive benefits for climate change, biodiversity and public health. The requirement for GI enhancement or new provision also features in several AGR and</p> |

⁸⁴ Section 66 and 72 of Planning (Listed Buildings and Conservation Areas) Act 1990 which confer duties to conserve and enhance listed buildings (s.66) and CAs (s.72).

| SEA Topic | Sub-Topic and Total Plan Impacts |
|---------------------------|---|
| | site allocation place principles. However, the draft Local Plan does propose to amend the Green Belt boundary and allocate some sites for development on greenfield land, thereby creating a localised loss of greenfield land. |
| Transport and movement | Sustainable Transport (Objective 13) |
| | <p>The Local Plan Development Strategy seeks to encourage a shift towards achieving sustainable transport patterns, with more intensive, higher density mixed-use development at accessible locations (Policy T1) and promoting active travel with development required to maximise opportunities for walking and cycling (Policy T2). Increasing the provision of homes and employment within the City could also reduce levels of in-commuting, however this will need to be confirmed through transport modelling.</p> <p>At a local level, there are several site allocations which are located beyond easy walking distance of key services which could result negative effects associated with increased use of private cars. Several of the AGRs perform less well in terms of overall accessibility, however connectivity and active travel improvements are proposed within the policy text and so over the long term this may be improved.</p> <p>The Plan's major transport proposals are however subject to further consideration (as set out in policy T2). The extent of positive effects for sustainable transport are reliant on other strategies and policies including the JLTP4 and the Bristol Transport Strategy.</p> |
| | Active travel (Objective 14) |
| | As set out under public health theme above, the Local Plan promotes an increased uptake of active travel both directly and indirectly (within Draft DS Policy text and through Draft Policy T6 text). However, the Plan includes some proposed development allocations, including site allocations and IDAs, that are currently not well-accessed by cycleways or PRoWs, which could counter such efforts and require additional infrastructure provision to ensure a modal shift away from the private car. |
| Climate, energy and waste | Flood risk (Objective 15) |
| | <p>Flood risk is considered in the process of allocating sites for development and in considering development proposals for non-allocated sites.</p> <p>Policy FR2 sets out that flood risk will be addressed on a strategic basis consistent with the River Avon Flood Strategy. It may also be the case that flood resilience / management infrastructure is delivered in parallel to major development (e.g. Policy DS4 Western Harbour) and the Plan's inclusion of green infrastructure, infrastructure and developer contributions and climate change adaptation policies offer potential delivery of flood mitigation, including site-level adaptations and multi-functional flood defences to reduce adverse effects.</p> <p>Notwithstanding this, maximising densities and making efficient use of under-used land within the City Centre boundary may result in development coming forward in areas that are currently at risk from flooding. There is potential for negative or significant negative effects as a result of the development of brownfield land within the Draft Local Plan DS policies; as while the exact location of future development is unknown at this stage, several of these areas overlap with areas of flood risk. The Local Plan Development Strategy policies (e.g. DS1, DS2, DS3, DS4, DS5 and DS8) permit development in these locations, however, require a flood risk sequential test; and a Flood Risk Assessment for development of sites at risk of flooding or are larger than one hectare in size. This approach is supported by flood risk policies which apply to all development within and outside the AGRs and require a sequential approach to be taken to flood risk management.</p> |
| | Sustainably manage natural resources (Objective 16) |
| | <p>Waste planning matters are primarily addressed through the West of England Joint Waste Core Strategy.</p> <p>The Local Plan promotes resource efficient and low impact construction for all new development, embodying 'circular economy' principles (Policy NSC1-NZC3) to minimise waste during the life cycle of development and reducing indirect effects such as construction emissions. This is considered to support positive effects for limiting carbon footprints of new future development and mitigating the effects of climate change. At a site level, the majority of effects against this Objective will be subject to implementation and are therefore unknown at this stage.</p> <p>Local Plan policies aim to deliver a safe and healthy city by addressing issues of water quality and contamination. With BCC's statutory duty to improve the condition of water bodies within the Bristol area, working towards the target of 'Good Ecological Status', new development adjacent to underground or surface water bodies is expected to contribute towards this objective either through on-site or off-site financial contributions.</p> |

| SEA Topic | Sub-Topic and Total Plan Impacts |
|-----------|---|
| | <p>In addition, water bodies within the Plan area are currently considered to have a chemical status of 'fail'. Site allocations and Growth and Regeneration Areas located adjacent to these sources could be affected or contribute to the poorer water quality, in the absence of appropriate mitigation.</p> <p>Policies also address potentially polluting development and development sensitive to pollution sources, with the overall effect of mitigating any adverse impacts on environmental amenity including water quality. In addition, higher water efficiency standards (above current building regulations) are set out within the Draft Plan, which could reduce any water stress (Draft Policy NZC1).</p> <p>While the policy position is clear, overall, there are unknown effects related to the cumulative impacts of housing and employment development, particularly where AGRs and IDAs are located near vulnerable water bodies (River Avon catchment).</p> |
| | <p>Air and noise pollution (Objective 17)</p> |
| | <p>A significant proportion of the Local Plan's AGRs, site allocations and several IDAs are located in an Air Quality Management Area (AQMA) or a cumulative impact zone; without appropriate mitigation for new development in these locations, there is risk of exacerbating poor air quality. In addition, the effect of additional development adjacent to the international ecological designations and habitats along the River Severn and Avon is uncertain and is being tested through HRA process.</p> <p>Policies that support delivery of electric vehicle infrastructure (Draft Policy T4A) and active travel serve to improve air quality and help to protect future communities from high exposure to pollutants. Furthermore, draft Local Plan Policy HW2 requirements for air quality assessments for new development; schemes of mitigation and justification for potentially polluting development with specific local air quality impacts; and mitigation for development in AQMAs is considered to safeguard existing and future communities from adverse impacts.</p> <p>The Agent of Change Principle embedded in Local Plan policy would ensure that effects of noise pollution in new development is limited (Policy HW1) which is particularly important given the Plan's Urban Living principles.</p> |
| | <p>Energy efficiency and renewable energy (Objective 18)</p> |
| | <p>The Local Plan strongly supports energy efficient design and construction, including through efficient heat networks and PassivHaus design (Policies NZC1, NZC2 and NZC5). These policy provisions would enable new development to mitigate and adapt to climate change and reduce overall CO2 emissions linked to energy generation. However, an uplift in development would still result in a short-medium term increase in demand for energy across the Plan area; and there could be delay in progressing larger renewable energy networks to support anticipated growth.</p> <p>While potential for renewable energy is identified and is considerable, the Plan does not make commitments for specific infrastructure projects and/or set out land safeguarding for renewable energy development, with the exception of new renewable energy capacity and energy storage particularly being encouraged in the Avonmouth Industrial and Bristol Port area. This could undermine coordinated delivery of infrastructure.</p> |

6.4 Evaluating the overall effects of the Local Plan

This section summarises broad effects of the Local Plan as a whole, compared to the current situation as described in Section 3.6. Specifically, as required in Article 5(1) Annex 1 of the SEA Directive this section considers the plan-level effects of the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

Secondary Effects: Secondary (or indirect) effects are effects that are not a direct result of the Plan but occur away from the original effect or as a product of a complex pathway. For the Publication Version November 2023 Draft Local Plan, the main secondary effects include:

- Meeting housing need (Objective 1) may result in cross-boundary collaboration to deliver unmet need. The secondary effects in neighbouring authorities within the Local Housing Market Areas are unknown.

- There are potential public and mental health benefits from: establishing a minimum housing target, ensuring the type of homes aligns with community need and enabling innovation in delivery. This could have the complex benefits of improving overall affordability of homes and reducing inequalities, whilst ensuring access to private and public open space, services and active travel infrastructure (Objective 6).
- The delivery requirements of the plan, in terms of mitigation and enhancement for inclusive economic development, new workspaces, digital connectivity, flood risk infrastructure, biodiversity net gain and digital connectivity, could result in complex viability negotiations taking place through the planning process and may result in fewer homes or businesses, key services or communities facilities being delivered.
- Whilst improving access to workspaces for SMEs, there is potential for displacement of large floorspace and typically lower-value employment within the City which is likely to have secondary impacts for levels of deprivation and access to employment. This is indirectly created by objectives for efficient use of land, concentration of employment uses on Industrial and Distribution Areas within the City, and dominant land values for residential uses.
- Whilst the Local Plan overall is seeking to maximise embodied carbon within the City's brownfield land, by promoting efficient use of land and urban living, releasing some former Important Open Spaces and Green Belt land for development could undermine other efforts to achieve carbon sequestration / fixing (such as Draft Policy NZC1 – NZCS5).
- There is potential for secondary impacts on design and character of the city overall from the combination of Urban Living, from maximising efficient use of brownfield land, tall buildings and densification.
- Allocation of both greenfield sites for employment and brownfield sites for residential in close proximity to international ecological designations and habitat sites along the River Severn and Avon may have secondary (and cumulative effects) on the future of these habitats. There are potential secondary effects on water quality and biodiversity due to development of IDAs, ASAs and associated industrial development concentrated within these sites. This is considered within the HRA.
- Air pollution benefits, reduced congestion and reduced obesity generated as secondary effect of cycling / active travel provision and public transport schemes.

Cumulative effects: See Table 18 below which takes the Total Plan Effects set out in Section 6.3 alongside the likely future without a plan. The commentary provided below also identifies relevant plans, programmes, strategies that may enhance the synergistic or cumulative effects of the Local Plan.

Table 18 Assessment of Cumulative Effects

| SA Objective | Total plan effects (Table 17) | Likely future without the plan (Table 6) | Cumulative effects |
|---|--|--|--------------------|
| 1. To ensure an adequate and diverse supply of housing that is affordable to everyone | ++ | -- | +/? |
| | A core objective of the Local Plan is the delivery of new and affordable housing. This is evident through the housing targets of a minimum of 34,700 new and affordable homes to be delivered by 2040, and for this to be exceeded where this is supported by service and infrastructure capacity. Cumulative effects are however, uncertain, on the basis that unmet local housing need will need to be delivered within the housing market area. | | |

| SA Objective | Total plan effects (Table 17) | Likely future without the plan (Table 6) | Cumulative effects |
|--|--|--|--------------------|
| 2. Promote the conservation and wise use of land, maximising reuse of previously developed land | +/? | -/? | +/? |
| | With the Plan's focus on urban potential sites, limited use of Green Belt land and limited greenfield development, the cumulative effects of the Plan would likely be overall positive for this Objective. Without the Plan or a focus on making efficient use of urban land, there is likely to be more pressure on greenfield land within the city or housing targets would be increasingly challenging to meet. This would have negative effects on other objectives too, including Objectives 6 and 12 in particular. | | |
| 3. Ensure easy and affordable access to key services | + | -/? | +/? |
| | Overall, the Plan's development strategy seeks to locate development within short distances to key services (local, town or district centres) which would result in city wide cumulative effects on accessibility, albeit there some site allocations and AGRs which are less easily accessible. Affordability of services is driven by other socio-economic factors outside the Plan's control. | | |
| 4. Increase participation in cultural and community activities | + | -/? | 0/? |
| | Similar to Objective 3, there could be cumulative increase in cultural or community facilities where the AGRs require this, or through developer contributions. Ensuring accessibility to community facilities (as set under SA Objective 3) could also result in increased participation. Whilst policies require consideration of the 'agent of change' principle to protect noise-generating uses, the protection of Local Green Spaces which are demonstrably special to the community and provisions to support community-led housing; there are limits to what a Local Plan can achieve in terms of participation in cultural and community activities. | | |
| 5. To reduce poverty and income inequality and quality of life for those in areas of disadvantage. | + | -/? | +/? |
| | As set out in the likely future without the Plan, Bristol holds significant and persistent socio-economic inequalities, and contains areas that are within the most deprived ranks of the Index of Multiple Deprivation 2019 nationally. Without a Local Plan, and strategic targeting of deprivation, the most deprived areas may continue to see no change in the current situation. Development of site allocations, IDAs and AGRs located in areas of high deprivation offer clear opportunities for regeneration and investment and could therefore deliver cumulative effects across more deprived areas for affordable housing delivery, employment, health outcomes and wider social mobility. Relevant interacting plans and strategies for employment are detailed in Objective 8. | | |
| 6. To reduce health inequalities and promote healthy lifestyles across the city | + | -/? | +/? |
| | Bristol experiences significant health and wellbeing inequalities. The Plan's development strategy seeks to regenerate more deprived areas through targeting investment to the AGRs and site allocations and seeking to increase access to employment opportunities for local residents. Homes would be expected to be delivered in accordance with space and amenity standards. Cumulative effects for health would also be linked to the Plan's strong focus on walking and cycling, protection of Local Green Spaces, provisions to improve air quality, development of affordable housing, and provisions to encourage healthy eating choices including food growing spaces. Relevant interacting plans and strategies for green infrastructure and air quality are detailed in Objectives 12 and 17. Effects are unknown as they are largely driven by individual choice. | | |
| 7. Ensure access to education and learning for all sections of society | - | - | 0/? |
| | Bristol contains a relatively young demographic and a significant proportion of students attributed to University of Bristol, and University of the West of England outside the Local Authority boundary. The Plan supports university expansion at Bristol Temple Quarter in Policy DS2 and aims to ensure that adequate services, including educational services, are provided. In addition, use of infrastructure and developer contributions could also deliver a net gain in facilities over the Plan period; these requirements should be evidenced further. Furthermore, Urban Living principles evidenced throughout the Plan could cumulatively indirectly improve access to education through siting development in close proximity to existing educational uses. | | |
| | -/? | -/? | 0/? |

| SA Objective | Total plan effects (Table 17) | Likely future without the plan (Table 6) | Cumulative effects |
|---|--|--|--------------------|
| 8. To support the economy and ensure that there are suitable opportunities for employment | <p>Bristol has a strong and growing economy, which will be further strengthened through a focus on strategic employment sites, concentrated employment uses on Industrial and Distribution Areas and development of workspaces (including affordable workspaces) within mixed use development. A continuing focus on inclusive growth and accessibility to employment for local residents could also help reduce persistent inequalities in terms of employment opportunities.</p> <p>However, as the development of new and affordable homes is identified as a core objective in development decisions, this can result in employment uses often placing second in the Plan Strategy. Although the major employment sites would continue to be protected, this may result in incremental loss of the city's available future employment land. The overall effect may be neutral or even negative, given the likely undersupply of employment land identified in the ELS (2019) and ELSNA (2021). Mitigation could include a 'net gain' or 'no net loss' of employment /FTE jobs to monitor whether the combination of other E policies are successfully achieving the Plan Objective of 'enabling the sustainable growth of our economy for everyone, with modern workplaces and digital infrastructure fit for the future'.</p> | | |
| 9. Ensure access to a range of shopping facilities for all sections of society | 0/? | -/? | +/? |
| | <p>The Plan includes policies which directs the provision of shopping and commercial uses to defined centres within the settlement hierarchy (Policy SSE2 and SSE4) and encourages different types of uses within these centres (e.g. temporary uses and markets). It also includes requirements for the protection and redevelopment of Broadmead as the city's principal shopping location (Policy DS1A). While there are unknowns regarding the medium-long term use of local centres and the high street following the Covid-19 pandemic, and the effects of changes to the General Permitted Development Order and Use Classes Order are unknown, where it can, the Plan focuses development within the urban area and Urban Living principles. This could cumulatively benefit the vibrancy of local centres and ensure that, in most cases, there is sufficient access to shopping facilities for local communities. By encouraging some residential use within the centres, and mixed uses in new developments to there is further potential for cumulative effects on access to shopping facilities on a city-wide basis.</p> | | |
| 10. To ensure the protection and enhancement of the historic environment and its setting | ? | -/? | ? |
| | <p>Bristol's historic landscape and character is significant, both nationally and internationally. The level of housing and economic growth promoted by the Plan could affect Bristol's heritage, including development of a more urban environment with potential impact on the city's skyline. However, the Plan's promotion of historic preservation and enhancement through design and conservation policies should help to minimise this. The Urban Living SPD, Spatial Frameworks and/or Design Codes prepared for AGRs should ensure area-specific design requirements are adhered to through implementation.</p> <p>Specific evidence base documents could be produced to further test the impacts on the most significant designated heritage assets.</p> | | |
| 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats | + | -/? | +/? |
| | <p>Despite Bristol's urban setting, the plan area holds areas of biodiversity significance within both nationally designated habitats (such as the Avon Gorge SAC and the River Severn Estuary Ramsar site) and locally designated habitats such as Local Nature Reserves, Wildlife Corridors and SNCIs. It is acknowledged that biodiversity is under threat globally and on regional and local scales, reflected in BCC's recent declaration of an 'Ecological Emergency'.</p> <p>The Plan includes policy to protect biodiversity and green infrastructure corridors and deliver biodiversity net gain. Impacts could be cumulative where development sites (including AGRs) overlap or are located adjacent to, within functionally linked land for or within impact zones of these habitats. This is particularly the case at Western Harbour and Avonmouth, where the impact of the employment allocations and site allocations is explored through the HRA process. The cumulative impact of policy requirements related to biodiversity and nature recovery could also have negative impacts on the delivery of development depending on how it affects viability, but these effects remain unknown.</p> | | |
| | + | -/? | + |

| SA Objective | Total plan effects (Table 17) | Likely future without the plan (Table 6) | Cumulative effects |
|---|--|--|--------------------|
| 12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation | <p>Bristol has an extensive area of green spaces relative to its urban setting, include the River Avon corridor, multiple historic parks and gardens and the Green Belt.</p> <p>The Plan aims to protect green space, supported by evidence prepared in the New Protection of Open Space Paper. The management and funding of such spaces is led by the Bristol parks and green spaces strategy⁸⁵, which will be updated in the future.</p> | | |
| 13. To encourage a demonstrable modal shift and reduce the need to travel | + | --/? | + |
| | <p>The Plan promotes walking and cycling, and locating development proposals in areas where sustainable travel patterns can be achieved, with the majority of AGRs being well served by public transport and many of the site allocations within walking distance of services and public transport nodes. More intensive, mixed use development at accessible locations could encourage more people to walk to local services. However, development of homes outside acceptable walking distances or in areas which experience poorer public transport connectivity could negatively affect air quality and congestion. Increasing uptake of EV charging may improve the baseline in these areas.</p> <p>Effects for this objective should also be positively enhanced through the West of England's Local Cycling and Walking Infrastructure Plan; JLTP4; Improvements to the Greater Bristol Bus Network; and capital programmes for major scheme delivery.</p> | | |
| 14. To maintain and improve the existing highway network | ? | --/? | + |
| | <p>As the Local Plan and Bristol Transport Strategy are generally mutually supportive in their objectives for transport it is considered that their implementation could generate positive cumulative effects across the Plan area.</p> <p>Referenced for further work as part of Policy T2, the delivery of JLTP4 schemes – including the A4174 South Bristol Link and Metrowest schemes, will likely generate improvements to the local and regional highway network. Other programmes and strategies that would also generate cumulative effects for Bristol alongside the Local Plan include WECA and Local Authorities capital programmes for major scheme delivery.</p> | | |
| 15. To reduce the risk of flooding from all sources | -/? | --/? | +/? |
| | <p>Bristol includes areas of high flood risk, particularly around the River Avon and adjacent to the River Severn at Avonmouth. This is likely to worsen when Climate Change allowances are made for levels of risk. The Plan includes policy to ensure that development supports the delivery of the Bristol Avon Flood strategy to ensure that flood risk is addressed on a strategic level.</p> <p>The Plan includes specific place principles for AGRs and Site Allocations located within flood risk zones, supported by Flood Risk policy that sets out a sequential approach to flood risk management.</p> <p>The combination of the delivery of flood improvements through major development (e.g. Draft Policy DS4 Western Harbour), the Bristol Avon Flood Strategy and localised improvements through the use of measures such as SUDS and the delivery of green infrastructure means that there are likely to be positive cumulative effects, although these remain unknown.</p> | | |
| 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | + | -/? | + |
| | <p>Bristol's housing development is likely to increase water demand in the short-medium term and increase the volume of waste requiring disposal.</p> <p>However, the Plan promotes use of sustainable construction and waste management; and would support the ongoing management of surface water bodies covered by the Water Framework Directive and Severn River Basin Management Plan. Water quality matters, including supply would</p> | | |

⁸⁵ <https://www.bristol.gov.uk/policies-plans-strategies/bristol-parks-and-green-space-strategy>

| SA Objective | Total plan effects (Table 17) | Likely future without the plan (Table 6) | Cumulative effects |
|--|---|--|--------------------|
| | <p>be addressed through the Bristol Water - Water Resources Management Plan⁸⁶ and equivalent plans for adjacent authorities' Drainage Bodies.</p> <p>The Plan would also operate in conjunction with the Towards a Zero Waste Bristol: Waste and Resource Management Strategy; and at a strategic level, the Joint Waste Strategy would continue to guide matters related to waste within and adjacent to the Plan area.</p> | | |
| 17. Minimise air and noise pollution | -/? | --/? | ? |
| | <p>Air pollution exceeds legal limits for NO2 and PM10 in parts of the city defined as Air quality Management Areas (AQMA), which has adverse health implications and increased deaths.</p> <p>Cumulative effects of this objective are linked to the scale of emissions reduction and decarbonisation achieved under other interrelated objectives, particularly within the transport sector. Given the current situation and key sustainability issues associated with air quality, the quantity of growth promoted through the Plan and the likelihood that the city may continue to attract some in-commuting from the Bristol Urban Area (given the unmet housing need), there are multiple unknowns for air quality effects. Effects will also be linked to the new Clean Air Zone in the City Centre.</p> | | |
| 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 | + | -/? | + |
| | <p>Whilst CO2 emissions have decreased by 33% since 2005, Bristol's current carbon emission projections would not meet carbon neutral target by 2030.</p> <p>The Plan's inclusion of additional, higher energy and water efficiency standards would improve the sustainability baseline of the built environment and generate cumulative effects across the Plan area, particularly for sustainable resource management, energy use and adaptation to climate change. Despite this, the increase in households is likely to drive up CO2 emissions in the short term or prior to wide adoption of design technologies/standards.</p> <p>Given that the Local Plan will be adopted alongside local and regional plans and strategies, namely the One City Climate Strategy and West of England Climate Emergency Action Plan⁸⁷, it is considered that there could be wider and significant cumulative effects for decarbonisation and climate resilience.</p> | | |

Synergistic effects: Synergistic effects interact to produce a total effect greater than the sum of the individual effects.

- There is potential for reduced inequalities in areas of persistent deprivation through: provision of new affordable housing development and mixed types of housing (such as HMOs, elderly persons housing), investment in higher quality employment spaces and supporting more inclusive access to employment. Requiring building-level measures to ensure resilience to future climate change impacts could reduce disproportionate effects on lower income or vulnerable households (i.e. reducing instances of winter fuel poverty or summer overheating).
- At a city-wide level, there is an opportunity for economic growth from smaller, mixed-use workspaces alongside the retention of strategic employment sites. This could be supported by the roll-out of superfast broadband, full-fibre connectivity or provision for full-fibre to be introduced. Developing more homes within the urban area, and ensuring faster broadband connectivity, could reduce the economic cost of congestion.
- The combination of requiring development to be located in locations where sustainable travel patterns can be achieved, along with Urban Living principles could result in synergistic effects leading to easier access for Bristol's population to key services.

86 <https://f.hubspotusercontent30.net/hubfs/7850638/Site%20Assets/Offline%20docs/Bristol-Water-Final-WRMP-2019-August-2019-REDACTED.pdf>

87 <https://westofengland-ca.moderngov.co.uk/documents/s2194/11c2%20-%20CE%20Action%20Plan.pdf>

- The combination of policies that support the uptake of EVs, sustainable transport measures and improved active travel routes, alongside reducing the need to travel, could have benefits for air quality and improved public health.
- There is an opportunity for the combined impacts of conserving and enhancing heritage and natural assets, managing new requiring tall buildings to be of high architectural standard and to enhance the city's skyline and increasing the weight placed on the City's Local Green Spaces, there could be a synergistic overall benefit to enhancing urban design and a liveable, healthy environment.
- By encouraging innovation in design, construction and location of diverse housing solutions, this could have the synergistic benefit of supporting SME builders and potentially improving sectoral growth in the construction sector, creating opportunities for all members of the community to access the housing market and creating innovation in sustainable, low carbon and affordable housing delivery.
- Several policies when taken together will support general public health and mental health improvements. This includes: increasing the weight given to green infrastructure within the city, such as Local Green Spaces; ensuring the delivery of space standards and amenity requirements for residential development; improving air quality; improving general accessibility to key services; increasing the provision of affordable homes; and concentration and clustering of hot food takeaways.
- There is increased opportunities to improve environmental quality, by making sure new buildings protect the environment, working towards zero carbon development and adapting to the likely impact of climate change. Water efficiency measures could also limit per capita usage and affect resultant water quality.
- When taken together the policies related to biodiversity and nature recovery could have synergistic effects on water quality and flood alleviation, health and well-being and responding to the impacts of climate change.
- Increasing the number of homes delivered, ensuring efficient use of brownfield land and maximising densities could place pressure on both physical and social infrastructure. Whilst there are policies in place to ensure that new development provides or contributes to measures to directly mitigate its impact, and infrastructure, facilities and services, consideration should be given as to whether there is a 'tipping point' at which existing infrastructure requires upgrade.

7. Methods for mitigating adverse effects and maximising beneficial effects (Stage B4)

7.1 Overview

The following section of the report summarises the main measures for ensuring adverse and unknown effects are mitigated from **Appendix 3** *Assessing the effects of the Bristol Local Plan Pre-Submission Publication Version (November 2023) policies* and **Appendix 4** *Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Sites*. It is not the purpose of this section to reiterate all detail of individual mitigation measures, opportunities to maximise benefits or cross-references in full here, and therefore regard must be had to individual policies and sites as appropriate.

It should be noted that the Interim SA Report (2019) set out a series of opportunities to maximise benefits (MB), provisions for appropriate mitigation (AM) and suggestions of appropriate cross-referencing (CR) to address perceived effects of implementing a policy in isolation. In most cases, appropriate mitigation suggested in the Interim SA Report (2019) has been incorporated as necessary within draft policy changes to mitigate effects. Suggestions for ‘cross-referencing’ as set out in 2019 are generally not carried forward on the basis that the Pre-Submission Publication Version (November 2023) is no longer a ‘Review’, and indeed that the Development Plan must be taken as a whole, making cross-referencing redundant. Opportunities to maximise benefits have been embedded where proportionate and effective to do so, or captured as potential measures to monitor progress of the Local Plan.

7.2 Mitigation for Draft Local Plan Policies

Table 20 below summarises the generalised mitigation measures and opportunities to maximise benefit arising from the policies within Publication Version November 2023 Draft Local Plan.

Table 19 General Mitigation Measures for Local Plan Policies

| Policy theme | Generalised Appropriate Mitigation Measures / Options for Monitoring Measures | Generalised opportunities to Maximise Benefits / Options for Monitoring Measures |
|-------------------------------------|---|--|
| Draft Development Strategy Policies | <ul style="list-style-type: none"> Reference the specific number of housing units to be delivered within each AGR in the main policy text. Require proposals for the redevelopment of commercial / business sites to ensure a defined quantum of workspace within mixed use developments to safeguard a mix and balance of these uses. Set out either: a floor space ratio for B use classes on a AGR basis; a requirement to monitor ‘no net loss’ of jobs (of varying skills) or set sector-specific floorspace requirements uses to ensure the delivery of a range of business uses. Establish the level of greenfield land to be maintained within the AGR, where this may change (i.e Western Harbour) | <ul style="list-style-type: none"> Prepare / reference spatial frameworks, or masterplans for each GRA. |

| Policy theme | Generalised Appropriate Mitigation Measures / Options for Monitoring Measures | Generalised opportunities to Maximise Benefits / Options for Monitoring Measures |
|---|--|--|
| | <ul style="list-style-type: none"> Publish a topic paper for exceptional circumstances case for the release of Green Belt sites and consider Green Belt compensatory measures. | |
| Draft Infrastructure and Developer Contributions Policy | <ul style="list-style-type: none"> Provide requirements for delivery for all types of infrastructure provision. | N/A |
| Draft Urban Living Policies | <ul style="list-style-type: none"> Provide greater definition of: 'appropriate evidence' needed to demonstrate that higher density forms of development are not viable and qualifying criteria for 'necessary to safeguard the special interest and character of the area'. Include guidance on whether density thresholds apply to proposals for change of use e.g. office to residential. | N/A |
| Draft Housing Policies | Demonstrate ongoing evidence of discussions with neighbouring LPAs to ensure unmet local housing needs can be accommodated within the housing market area. | <ul style="list-style-type: none"> Provide a greater definition of the term 'underused' in the context of Industry and Distribution Areas. Provide a definition of local community facilities and essential infrastructure. Provide evidence of service requirements needed to support an uplift in student population. Provide evidence of optional technical standards for accessible homes. Additional information / justification is required for appropriate housing mix. Consider prescribing target densities for self-build and community led sites. Provide guidance for how self-build or community-led proposals would need to demonstrate and mitigate loss of redundant community facilities / underused land in IDAs. |
| Draft Employment Policies | <ul style="list-style-type: none"> Set out requirement by DS policy for employment type (potentially broken down by sector). Require no net loss of jobs in provision of workspace across the DS policies. Provide viability evidence to demonstrate that the thresholds set for policy requirements are realistic and costs are not of a scale that would make the Plan, and specifically its housing target undeliverable. For employment uses evidence the impact of development proposals on the highway network and consider opportunity to strengthen active travel and travel by public transport (particularly for Avonmouth). | <ul style="list-style-type: none"> Ensure skills development and employment initiatives are located within easy access to reduce the need to travel for learning / employment. |
| Draft Centres, Shopping and Evening Economy Policies | N/A | <ul style="list-style-type: none"> Make references to the potential for high density floorspaces for town centre uses. Make reference to specific timeframes for temporary uses. |

| Policy theme | Generalised Appropriate Mitigation Measures / Options for Monitoring Measures | Generalised opportunities to Maximise Benefits / Options for Monitoring Measures |
|---|--|--|
| | | <ul style="list-style-type: none"> Reference benefits of reducing the need to travel by car and encouraging walking and cycling on heath and air quality. |
| Draft Biodiversity and Nature Recovery Policies | N/A | <ul style="list-style-type: none"> References to associated benefits arising from the policies on health and wellbeing, climate change, air quality and heritage townscapes and landscapes in the city. |
| Draft Green Space Policies | <ul style="list-style-type: none"> Access to open space to be informed by updated Parks and Green Spaces Strategy to ensure equitable access. Provide supporting evidence to demonstrate where development may be appropriate on Reserved Open Green Space. Loss of GI to be replaced where it would enhance cohesive GI networks, as set out within updated PPG⁸⁸. | <ul style="list-style-type: none"> Clarify the principles of 'harm' to LGS characteristics, role and harm, alongside 'proportional scale'. |
| Draft Transport Policies | N/A | N/A |
| Draft Climate Change and Flood Risk Policies | <ul style="list-style-type: none"> Make reference need to conserve / retain ecological networks and climate refugia within site-level adaptations. Consider development adjacent to underground or surface water bodies should be required to mitigate where harmful abstraction is proposed. Consider inclusion of 'embodied' carbon emissions alongside materials for whole-life assessment of development. Meet or exceed the recycling targets for waste streams and generating low-carbon energy from suitable remaining waste, with reference to specific targets. | <ul style="list-style-type: none"> Reference to use of natural resources / design that would respond to existing built environment, including heritage assets. Include reference to adaptive measures against latest climate change projections for flood risk, and reference to SuDS for water efficiency and harvesting. Develop stronger carbon offsetting and financial contribution guidance, including potential quantification of off-site contributions to support implementation of the policy. Consider the inclusion of 'unregulated' emissions within carbon offsetting target to maximise future performance of this policy. Develop specific guidance in respect of retrofitting existing buildings, including for change of use. Reference direct support within the policy for renewable and low carbon energy generation developments that are led by, or meet the needs of, local communities. |
| Draft Design and Conservation Policies | <ul style="list-style-type: none"> Provide further guidance on key terms used in policy e.g. 'excessive shadowing'. Provide minimum liveability standards for short-term occupancy / identified occupier groups. | <ul style="list-style-type: none"> Reference to flexibility in space standards for community-led or co-housing developments where required. |
| Draft Health and Wellbeing Policies | <ul style="list-style-type: none"> Make reference to mitigation of air quality (e.g. acidification and corrosion) impacts in respect of the natural environment, including for sensitive species and habitats, and historic environment. | <ul style="list-style-type: none"> Include guidance for proposals to improve air quality or mitigate impacts, including through GI provision and enhancement in development. |

⁸⁸ MHCLG (2019). Planning Practice Guidance. Paragraph: 005 Reference ID: 8-005-20190721

| Policy theme | Generalised Appropriate Mitigation Measures / Options for Monitoring Measures | Generalised opportunities to Maximise Benefits / Options for Monitoring Measures |
|------------------------------------|---|---|
| Draft Food Sustainability Policies | N/A | <ul style="list-style-type: none"> Clarify the possible 'rehabilitation' approaches for existing statutory allotments e.g., funding community allotment groups and education programmes, provision of ancillary infrastructure such as access or water connections etc. Include support for local renewable energy uses on allotments and community growing sites. Include the need to ensure food growing spaces are integrated with existing green and blue infrastructure assets. |

7.3 Mitigation for Draft Local Plan Site Allocations

Appendix 4 Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Sites sets out suggested appropriate mitigation for each of the proposed allocations.

One of the most challenging limitations and difficulties encountered during the assessment of draft allocations and broad regeneration areas was that the evidence base continues to develop (e.g. infrastructure and viability).

Table 20 General Mitigation Measures for all Site Allocations

| SEA Topic | General Mitigation Measures for Site Allocations |
|-----------------------------------|--|
| Population, housing and community | <ul style="list-style-type: none"> Provide specific evidence for Housing Policies, including that for self-build developments. |
| Health and inequalities | <ul style="list-style-type: none"> For sites within or adjacent to AQMAs, ensure that any air quality improvement mitigation ties with the BCC Air Quality Action Plan priorities and targets, and is updated once the implications of Clean Air Zone are known. Improve physical access to connections with Local Centres and community facilities. |
| Economy and employment | <ul style="list-style-type: none"> Ensure a 'no net loss' of employment and FTEs for sites where redevelopment of employment land / industrial areas is proposed. |
| Townscape and landscape | <ul style="list-style-type: none"> For sites within the Avonmouth area, set out mitigation measures for biodiversity and habitats potentially affected by development detailed in the future Habitats Regulations Assessment (HRA). For sites that could affect Conservation Areas, Registered Landscapes, Listed Buildings or the settings of a heritage asset, proposals should ensure proportionate protection and enhancement of such features, in line with policy and Historic England guidance. |
| Transport and movement | <ul style="list-style-type: none"> Infrastructure provisions to encourage modal shift away from private car use (e.g. carpooling, public transport, cycle infrastructure and cycleways). Require improved and appropriate walking and cycling provision where sites are relatively poorly accessed, for example at Avonmouth. Mitigate impact(s) of development proposals on the local highway network via traffic modelling. |
| Climate, energy and waste | <ul style="list-style-type: none"> In relation to development within flood risk areas, requirement that a Sequential Test is undertaken. Ensure development layout minimises risk for future occupants and/or neighbouring uses. Ensure that site-specific flood risk assessments and groundwater and surface flow assessments account for latest available climate change projection data. |

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|--|--|
| | <ul style="list-style-type: none">• For sites adjacent to water bodies that are classified as ‘poor’ or ‘moderate’ in environmental status, site development could include off-site mitigation improvements. |
|--|--|

8. Measures to monitor the significant effects of implementing the Local Plan (Stage B5)

8.1 Overview

The following section of the report summarises the framework for monitoring any adverse or unforeseen effects of the Local Plan policies and site allocations, as detailed in **Appendix 3** *Assessing the effects of the Bristol Local Plan Pre-Submission Publication Version (November 2023) policies* and **Appendix 4** *Predicting and evaluating the effects of Publication Version November 2023 Draft Local Plan Sites*.

In order to assess the sustainability effects of the Local Plan, and to mitigate any unforeseen effects of the Plan, it will be necessary to monitor specific issues under each SA Objective and decision-making criteria. The Monitoring Framework (set out in Section 8.2) provides suggestions for the Local Plan future monitoring programme and will act as a method of assessment of the Local Plan implementation, once this is formally adopted.

The development of the Monitoring Framework is based on the requirements of Article 10 of The SEA Directive, which requires that monitoring of significant environmental effects of the implementation of plans and programmes in order to 'identify at an early stage unforeseen adverse effects, and to be able to take appropriate remedial action'. Annex 1 (i) of the Directive states that the SA must include 'a description of the measures envisaged concerning monitoring in accordance with Article 10'. It is therefore the intention of the Monitoring Framework to help ensure that the benefits of the Local Plan are achieved through the planning process and to measure success against the Plan's objectives.

A significant source of monitoring indicators is the BCC Annual Monitoring Report (AMR), which documents the progress of the adopted Local Plan. The AMR also includes indicators to measure and assess the sustainability effects of implementing the Local Plan, including environmental, social and economic effects of draft policies and site allocations.

8.2 Monitoring Framework

A refreshed version of the Monitoring Framework should be developed with the future iteration of the SA and any amendments to the Local Plan or AMR indicators, to ensure that this remains effective.

Table 21 Potential Monitoring Indicators

| SEA Theme | SA Framework Objective | Decision-making criteria | Potential Key Monitoring Indicators ⁸⁹ |
|---|---|--|--|
| Population, Housing and Communities | 1.To ensure an adequate and diverse supply of housing that is affordable to everyone | Would development or policy provide sufficient housing to meet the identified needs of all communities within the city? | <ul style="list-style-type: none">Numbers of homes granted permission and completions, and number of affordable housing units.Performance of Bristol City Council against annual measurement against of housing delivery (e.g. the Housing Delivery Test, or equivalent).Number of homeless households, estimates of over-crowded and concealed households, or number in temporary accommodation.Number of conversions of offices to housing via permitted development rights.Proportion of population living in the most deprived 10% areas in England from Index of Multiple Deprivation.Number of units secured as purpose built student accommodation completions.Number of HMO planning applications and licensing data.Number of traveller sites delivered.Number of accessible units secured. |
| | | Would the development or policy ensure an adequate contribution to affordable housing? | |
| | | 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? | |
| | | Would the development or policy enable alternative methods of delivery, including community-led and self-build? | |
| | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land | Would development or policy provide an opportunity for the reuse or regeneration of previously developed land? | <ul style="list-style-type: none">Annual percentage of all homes (new and converted dwellings) built on brownfield land.Proportion of site supply from Brownfield Land Register. |
| | | Would development or policy provide an opportunity for a higher density within a sustainable location? | <ul style="list-style-type: none">Average density of development (dwellings per hectare).Average density of development (dwellings per hectare) of development granted planning permission in AGRs. |
| | | Would development or policy maintain greenfield land and maintain the openness and permanence of the Green Belt? | <ul style="list-style-type: none">Area of development in the Green Belt and on other greenfield sites (i.e. former Important Open Space). |
| | 3. Ensure easy and affordable access to key services | Would development or policy result in a net gain of community or service facilities? | <ul style="list-style-type: none">Number of organisations registered within the Voluntary, Community and Social Enterprise sector.Amount of floorspace delivered for community and leisure uses within new developments. |
| | 4. Increase participation in cultural and community activities | Would development be within, or would policy ensure development is within, easy walking distance of key services (e.g. GP, post office, community centre)? | <ul style="list-style-type: none">Percentage of new units within 800m of key services (e.g. GP, post office). |
| | Health and Inequalities | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | Would development or policy contribute to improvements in the built environment in deprived areas? |
| 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">Percentage of population living in the most economically deprived 10% areas within the Index of Multiple Deprivation.Delivery of homes and jobs in the most economically deprived 10% areas within the Index of Multiple Deprivation.Number of jobs created through re-development of former Industrial and Warehousing Areas |
| 6. To reduce health inequalities and promote healthy lifestyles across the city | | Would development or policy contribute to improving air quality? | <ul style="list-style-type: none">Percentage of city covered by an Air Quality Management Area. |
| | | 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? | <ul style="list-style-type: none">Difference in life expectancy and health between 10% least deprived areas and other areas of the city based on the Index of Multiple Deprivation.Percentage of the population that report below average mental wellbeing, based on the Bristol Quality of Life Survey⁹⁰. |
| | | Would development or policy make walking and cycling easy and attractive as routine methods of transport? | <ul style="list-style-type: none">Proximity to Key Walking Routes, as set by the Local Cycling and Walking Infrastructure Plan (LCWIP).Proximity to cycle network or new LCWIP cycle networks.Percentage of the population that cycle weekly, based on the Bristol Quality of Life Survey⁹¹. |
| 7. Ensure access to education and learning for all sections of society | | Would development or policy result in a net gain of adequate educational facilities? | <ul style="list-style-type: none">Percentage of population living in areas of education, skills and training deprivation, from the Index of Multiple Deprivation. |
| | | Would development or policy ensure that educational services are located within easy walking distance? | <ul style="list-style-type: none">Percentage of population within 800m walking distance from an early years’ facility or primary school.Percentage of population within 1500m walking distance from a secondary school. |
| Economy and Employment | 8. To support the economy and ensure that there are suitable opportunities for employment. | 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? | <ul style="list-style-type: none">Amount of floorspace granted permission and completions of office, industrial and warehousing development.Number of FTE in proposed workspaces within the AGRs. |
| | | Would development or policy support opportunities for growth (i.e. creation of employment spaces, supporting infrastructure etc.) in priority employment sectors? | <ul style="list-style-type: none">Number of FTE in the priority employment sectors (specified by the Local Industrial Strategy). |
| | | Would development or policy regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment? | <ul style="list-style-type: none">Level of unemployment, based on the Employment Deprivation Domain Index (IMD data). |
| | | Would development or policy maintain existing strategic employment opportunities? | <ul style="list-style-type: none">Number of planning applications / prior approvals within strategic employment areas (i.e. applications for retention by sqm). |

⁸⁹ See Appendix 5 for further guidance https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

⁹⁰ <https://www.bristol.gov.uk/documents/20182/33896/Bristol+Quality+of+Life+survey+2020+to+2021+report.pdf/40acbac5-6166-0413-3df7-65ffd1362829?t=1616171291250>

⁹¹ <https://www.bristol.gov.uk/documents/20182/33896/Bristol+Quality+of+Life+survey+2020+to+2021+report.pdf/40acbac5-6166-0413-3df7-65ffd1362829?t=1616171291250>

| SEA Theme | SA Framework Objective | Decision-making criteria | Potential Key Monitoring Indicators ⁸⁹ |
|---------------------------|---|--|---|
| | 9. Ensure access to a range of shopping facilities for all sections of society | 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? | <ul style="list-style-type: none"> Percentage coverage of 5G or equivalent digital technology⁹², in line with the Connecting Bristol Strategy⁹³. Business-related scope 1, 2 and 3 emissions, above those identified in the in the Bristol Climate Strategy⁹⁴. Monitor rates of in-commuting through transport modelling. |
| | | Would development or policy enhance and diversify the vitality and viability of local / retail centres? | <ul style="list-style-type: none"> Level of retail floorspace granted permission or prior approvals. Percentage of vacancy rates within centres. Amount of floorspace of different retail uses (completions and commitments) within centres. |
| | | Would development be, or policy ensure, development is within easy walking distance of retail services? | <ul style="list-style-type: none"> Percentage of new units within 800m of centres |
| Townscape and Landscape | 10. To ensure the protection and enhancement of the historic environment and its setting | Would development or policy avoid degradation of heritage assets, townscape and landscape? | <ul style="list-style-type: none"> Number of heritage assets classified as ‘at risk’ on the Local Register. |
| | 11. To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats | Would development or policy protect biological, geological and nationally or internationally designated nature conservation assets from adverse effects? | <ul style="list-style-type: none"> Extent and condition of SSSIs, from Natural England Sites of Special Scientific Interest Units (England) data. Biological condition and integrity of SNCIs and LNRs (BCC PGSS). Percentage of the city protected for wildlife. |
| | 12. To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation | Would development or policy enable a net gain in biodiversity? | <ul style="list-style-type: none"> Area of habitat delivered through biodiversity net gain contributions (future monitoring consideration). |
| Transport and Movement | 13. To encourage a demonstrable modal shift and reduce the need to travel | Would development or policy maximise the opportunity to provide multifunctional green infrastructure? | No specific indicators identified. |
| | | Would development or policy offer an opportunity to improve access to and quality of sustainable transport modes (walking, cycling and public transport) for all communities? | See indicators recommended for SA Objective 6, in relation to active travel provision. |
| | 14. To maintain and improve the existing highway network | Would development or policy offer an opportunity to support the delivery of new transport and digital infrastructure? | <ul style="list-style-type: none"> Percentage coverage of 5G or equivalent digital technology⁹⁵, in line with the Connecting Bristol Strategy⁹⁶. |
| Climate, Energy and Waste | 15. To reduce the risk of flooding from all sources | Would development or policy likely bring an increase in levels of traffic in an area already experiencing congestion issues? | <ul style="list-style-type: none"> Percentage of households with a car based on ONS Census data. Percentage of residents who view traffic congestion to affect quality of life, based on the Bristol Quality of Life Survey⁹⁷. |
| | | Would development or policy be directed towards lower flood risk areas and / or offer opportunities to significantly reduce flood risk? | <ul style="list-style-type: none"> Number of units / floorspace proposed and delivered on Flood Risk Zones 2, 3a and 3b. Number of properties at risk from flooding events, using data from Environment Agency mapping. |
| | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | Would development or policy support sustainable and resilient flood risk management? | <ul style="list-style-type: none"> Number of households and businesses protected by strategic flood risk infrastructure. |
| | | Would development or policy have a beneficial effect on water resources? | <ul style="list-style-type: none"> Per capita water consumption, based on Bristol Water data⁹⁸. |
| | | Would development or policy likely have an effect on water quality, and would it provide opportunity to improve water quality? | <ul style="list-style-type: none"> Percentage extent of measured waterways achieving ‘good’ ecological status or better; and percentage extent of measured waterways achieving ‘fair’ or ‘fairly good’ ecological status, using Environment Agency data. |
| | | Would development or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production? | <ul style="list-style-type: none"> Annual city-wide domestic / non-domestic recycling (tonnes). Annual city-wide domestic / non-domestic non-hazardous landfill waste (tonnes). Annual city-wide domestic / non-domestic inert landfill waste (tonnes). |
| | | Would development or policy maximise opportunities to support sustainable urban food production? | <ul style="list-style-type: none"> Number of allotment plots and hectares of Grade 3 Agricultural land used for growing purposes. |
| | 17. Minimise air and noise pollution | Would development minimise exposure to pollution or offer opportunity to reduce pollutions? | <ul style="list-style-type: none"> Percentage of population at risk of exposure to poor air quality (i.e. located within an AQMA or cumulative impact zone). |
| | 18. To maximise the potential for energy efficiency, reduce greenhouse gas emission and ensure that the built and natural environment and its communities can withstand the effects of climate change | Would development or policy enable aspirational targets for energy efficiency to be achieved? | <ul style="list-style-type: none"> City-wide direct energy use, transport and waste management emissions (ktCO₂e⁹⁹). Average energy efficiency of housing stock (using EPC data from BRE Survey¹⁰⁰). |
| | | Would development or policy provide opportunities for a net gain in renewable energy production and zero carbon energy supply within the Plan area? | <ul style="list-style-type: none"> Annual GWh renewable energy generated in Plan area. Installed capacity of renewable energy generating development within Plan area. |
| | | Would development or policy provide opportunities for the use of low carbon and decentralised energy sources (including energy networks)? | <ul style="list-style-type: none"> Coverage of Heat Priority Areas (km) and numbers of properties served. |
| | | Would development or policy increase resilience to the effects of climate change? | <ul style="list-style-type: none"> Percentage of properties, population and land at risk of future flood events, accounting for climate change scenarios, based on future Strategic Flood Assessment and Environment Agency data. |

⁹² Using Open Data such as <https://www.nperf.com/en/map/5g>

⁹³ https://www.connectingbristol.org/wp-content/uploads/2019/11/Connecting_Bristol_300819_WEB.pdf

⁹⁴ <https://www.bristolonecity.com/wp-content/uploads/2020/02/placeholder-climate-strategy.pdf>

⁹⁵ Using Open Data such as <https://www.nperf.com/en/map/5g>

⁹⁶ https://www.connectingbristol.org/wp-content/uploads/2019/11/Connecting_Bristol_300819_WEB.pdf

⁹⁷ <https://www.bristol.gov.uk/documents/20182/33896/Bristol+Quality+of+Life+survey+2020+to+2021+report.pdf/40acbac5-6166-0413-3df7-65ffd1362829?t=1616171291250>

⁹⁸ Including that held within the Bristol Water Long-term Strategy: https://f.hubspotusercontent30.net/hubfs/7850638/Site%20Assets/Offline%20docs/BW_Strategy-document_digital-version_1.1-2.pdf

⁹⁹ <https://www.bristolonecity.com/wp-content/uploads/2020/02/placeholder-climate-strategy.pdf>

¹⁰⁰ <https://www.bristol.gov.uk/documents/20182/2870395/Bristol+Intergrated+Housing+Stock+Modelling+Database+Report.pdf/422e4bd6-56d1-ff8b-640c-6a0f6698873e>

