



## Bristol Local Plan Review

# **Interim Sustainability Appraisal of the 'March 2019 Consultation Draft' Plan**



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## 1. Introduction

### 1.1 Overarching role of the Interim Sustainability Appraisal and the Bristol Local Plan Review

In March 2019, Bristol City Council undertook public consultation on the Bristol Local Plan Review Draft Policies and Development Allocations ('the March 2019 Consultation Draft'). This Consultation Draft represents the main document of the Bristol Local Plan Review.

Planning policies for the Bristol Local Plan are contained within the Core Strategy (2011); the Site Allocations and Development Management Policies Development Plan Document(2014); and the Bristol Central Area Plan (2015) which together comprise the Bristol Local Plan. 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 Joint Spatial Plan (JSP) commenced the interim review process for the Core Strategy; with the publication document of the JSP (November 2017) setting the direction for the Local Plan Review strategy.

The aim of the Local Plan Review is not to propose a wholesale change of all current policies at this stage, but to undertake necessary updates in light of both changes to national policy and this changing regional context.

The Interim Sustainability Appraisal ('Interim SA') therefore provides 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 environmental effects. It will be used to test the evidence underpinning the plan and to help to demonstrate how the tests of soundness have been met. As sustainability appraisal involves an iterative process informing the development of the plan, it will continue to be updated as the plan evolves.

The Interim Sustainability Appraisal builds upon the work undertaken to set the context and objectives, baseline and scope, which were established as part of the 2018 Scoping Report<sup>1</sup>. This Scoping Report was also published for consultation in March 2019.

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<sup>1</sup> <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 Interim Sustainability Appraisal

### 2.1 Overview

At the time of preparation of the March 2019 Consultation Draft and Interim SA, 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.

During the preparation of the Interim SA, the **UK-EU Trade and Cooperation Agreement** was prepared and agreed between parties in December 2020, and came into force on 1<sup>st</sup> 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 remain 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 the Interim SA, and in the absence of transposition of the UK-EU Trade Agreement in SEA legislation, 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 Directive<sup>2</sup> 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. Article 4 furthers 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*

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<sup>2</sup> <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).

### **SEA Regulations<sup>3</sup>**

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 the Interim SA which 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 programmes<sup>4</sup>. This states that the Local Planning Authority must:

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

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<sup>3</sup> <http://www.legislation.gov.uk/ukxi/2004/1633/made/data.pdf>

<sup>4</sup> Part 2, Section 19, Planning and Compulsory Purchase Act 2004 (c. 5)

## 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 requirements<sup>5</sup>.

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<sup>6</sup>. 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)<sup>7</sup>.

The sustainability appraisal 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 Plan<sup>8</sup>.

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<sup>5</sup> National Planning Policy Framework (2019) Paragraph 32

<sup>6</sup> 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.

<sup>7</sup> Planning Practice Guidance (2019) Paragraph: 001 Reference ID: 11-001-20190722

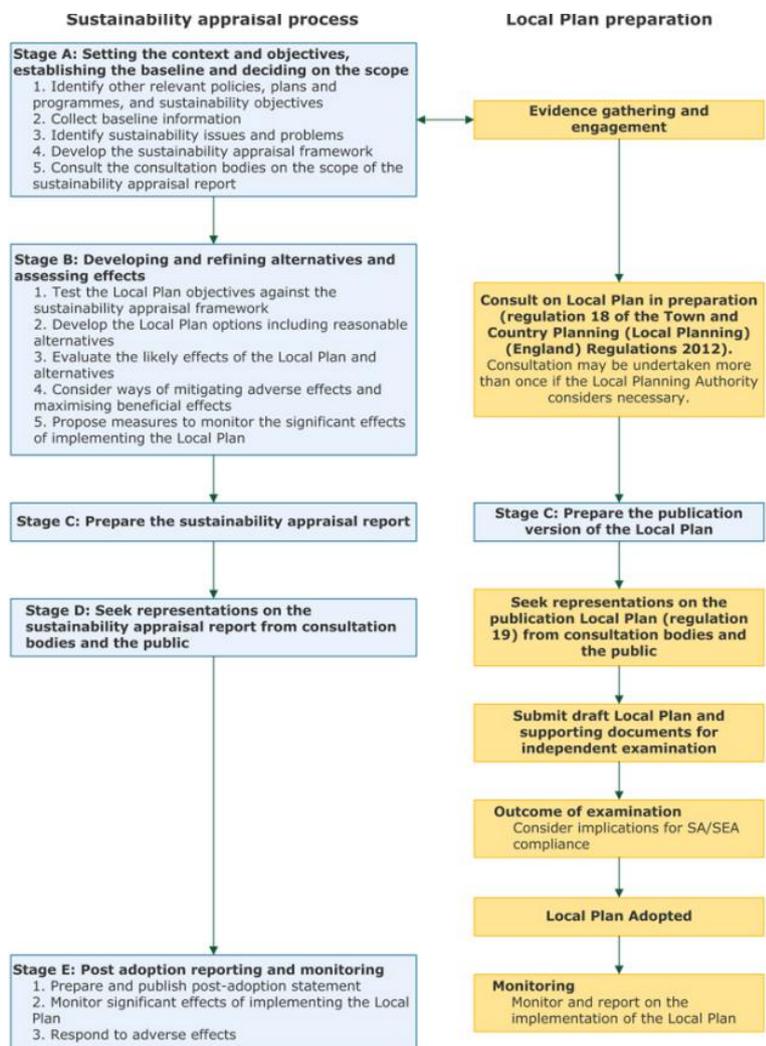
<sup>8</sup> Planning Practice Guidance (2014) Paragraph: 009 Reference ID: 11-009-20140306

Paragraph 13 of the PPG sets out the key stages of Local Plan preparation and their relationship with the sustainability appraisal process. Stage B<sup>9</sup>, which is to be undertaken alongside Regulation 18 consultation periods on the Local Plan, 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.

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

**Figure 1 Sustainability Appraisal Process**



Tasks A1- A5 were undertaken as part of the Scoping Report from 2018, which is attached to this Interim Report at Appendix 1. The purpose of the Scoping Report was to identify other relevant

<sup>9</sup> Planning Practice Guidance (2014) Paragraph: 013 Reference ID: 11-013-20140306

plans, programmes and sustainability objectives, collect baseline information, identify sustainability issues and being to develop the SA framework. The Scoping Report formed part of the March 2019 Consultation and was itself subject to consultation with statutory bodies in April 2017.

An update of Tasks A1 -A3 has also been undertaken as part of the Interim Sustainability Appraisal. 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), it was considered necessary to update the baseline section of the report to reflect recent economic changes since the Scoping Report 2018. It is recommended that future stages of the SA include updates to both the baseline and objectives to capture sustainability issues which are still emerging.

**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 2001/42<sup>10</sup>. 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.

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

As the Interim SA 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.

**Figure 2 Overlap of SEA, Interim SA and Habitat Regulation Assessment**



The requirement for an HRA will be reported separately and incorporated within the next update of the iteration of the Sustainability Appraisal.

**2.4 Structure of the Sustainability Appraisal**

Table 1 sets out how the 2020 Interim SA corresponds to the relevant part of the SEA Directive, Environmental Assessment of Plans and Programmes Regulations 2004 and PPG.

<sup>10</sup> [https://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](https://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf)

**Table 1 Requirements of Planning Practice Guidance and SEA Directive, alongside the structure of the 2020 Interim SA**

| Sustainability Appraisal Stage (Planning Practice Guidance)  |   | 2018 Scoping Report (presented at Appendix 1) | 2020 Interim SA Section (this report)   | SEA Directive and Regulations requirements   |
|--|---|---|---|--|
| <b>Stage A:</b> Setting the context and objectives, establishing the baseline and deciding on the scope. | <b>A1:</b> Identifying other relevant plans, policies and programmes and sustainability objectives. | ✓   | <b>Section 3:</b> Baseline Stages A1 – A4: 2018 Scoping Report and Baseline Update, summarising the ‘current situation’ and implications for the Sustainability Appraisal Framework   | (a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes<br>(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme<br>(c) the environmental characteristics of areas likely to be significantly affected<br>(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<br>(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 |
|  | <b>A2:</b> Collecting baseline information.   | ✓   | <b>Appendix 1.1:</b> 2018 Scoping Report and <b>Appendix 1.2:</b> March 2020 Baseline Update  |  |
|  | <b>A3:</b> Identifying sustainability issues and problems.  | ✓   |   |  |
|  | <b>A4:</b> Developing the sustainability appraisal framework.                                       | ✓   | <b>Section 3</b> Developing the Update to the Sustainability Appraisal Framework (Stage A4 Review)<br><b>Appendix 1.1:</b> 2018 Scoping Report and <b>Appendix 1.2:</b> March 2020 Baseline Update  |  |
|  | <b>A5:</b> Consulting on the scope of the sustainability appraisal.                                 | (April 2017)                                  | <b>Appendix 1.1:</b> 2018 Scoping Report and <b>Appendix 1.2:</b> March 2020 Baseline Update  |  |
| <b>Stage B:</b> Developing and refining alternatives and assessing effects.                              | <b>B1:</b> Testing the Local Plan Objectives against the SA framework                               |   | <b>Section 4</b> Testing the Local Plan Objectives, against the Sustainability Appraisal Framework  |  |
|  | <b>B2:</b> Developing the Local Plan options including reasonable alternatives.                     |   | <b>Section 5</b> Developing the Local Plan 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<br>(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   |
|  | <b>B3:</b> Evaluate the likely effects of the Local Plan and alternatives.                          |   | <b>Section 6.3</b> Predicting and evaluating the effects of the Local Plan policy options and <b>Appendix 3</b> (policy options proformas)<br><b>Section 6.3</b> Predicting and evaluating the effects of Local Plan March 2019 Consultation Draft Sites, and <b>Appendix 2</b> (methodology) and <b>Appendix 4</b> (draft site options proformas)<br><b>Section 6.4</b> Evaluating the overall total effects of the Local Plan |  |
|  | <b>B4:</b> Consider ways of mitigating adverse effects and maximising beneficial effects.           |   | <b>Section 7</b> Mitigation   |  |
|  | <b>B5:</b> Propose measures to monitor the significant effects of implementing the Local Plan.      |   | <b>Section 8</b> 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<br>(i) A description of measures envisaged concerning monitoring in accordance with Regulation 17   |

### 3. 2018 Scoping Report and Baseline 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 process<sup>11</sup>, 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 (see **Appendix 1.1**). 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 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 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 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. The Baseline Update was therefore predominantly reviewed in March 2020, and subsequently updated when new information was encountered during preparation of the Interim SA 2020 (see **Appendix 1.2**). 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.

#### 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 plan<sup>12</sup>.

Using the 2018 Scoping Report and 2018 SA Framework Objectives as a starting point, the methodology employed for the March 2020 Baseline Update review included examining the following information:

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<sup>11</sup> Paragraph: 013 Reference ID: 11-013-20140306

<sup>12</sup> Paragraph: 016 Reference ID: 11-016-20190722

- **February 2018 Scoping Report Consultation Responses:** The Scoping Report 2018 includes one response received from Natural England as a statutory body, with no further responses received from the remaining consultation bodies. Consideration has been given within the Baseline Update to understand whether the comments received require additional amendments to the SA Framework.
- **March 2019 Local Plan Review Consultation Responses:** Sustainability issues raised during the March 2019 Local Plan Review Consultation by Natural England, Environment Agency and Historic England have also been considered as part of the review to the SA Framework.
- **Changes to the policy context since scoping:** Key national, regional and local strategy and policy documents published since February 2018 were considered for inclusion within the policy review. This approach assumes that all relevant documents published prior to February 2018 were included within and informed the preparation of the SA Framework as set out in the Scoping Report. Each document was reviewed to identify relevant objectives or policies for the Bristol Local Plan Review, and the way those objectives or any environmental considerations should be taken into account in plan preparation.
- **Changes to the environmental, economic and social baseline:** A list of potential new evidence base documents published was also identified. Adopting a proportionate approach, the March 2020 Baseline Update does not seek to undertake a wholesale review of all baseline data and figures included within the 2018 Scoping Report. Instead the focus has been to identify any specific baseline studies or analysis that have been produced for the Bristol Plan Area and the West of England region. Each document was reviewed to identify key baseline indicators, and their performance against any stated targets or comparators, the relationship with the Bristol Local Plan / Plan area, and the way that key environmental considerations should be accounted for.

This information was used to determine any new ‘key sustainability issues’ or changes to existing issues that should be incorporated within any update to the SA Framework, in accordance with SEA/SA guidance<sup>13</sup> 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 Report 2020, the Joint Spatial Plan was formally withdrawn following examination, 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

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<sup>13</sup> 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.

addition, proposals for national planning reform were published for consultation in August 2020. The effects of these structural and regional shocks remain uncertain and will require the evidence baseline to be continually updated throughout later stages of the Local Plan Review, and to be reflected insofar as feasible in the future iterations of the Local Plan Sustainability Appraisal.

### **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 remain 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). For the purposes of the Interim SA, and in the absence of transposition of the UK-EU Trade Agreement in SEA legislation, this has been prepared in accordance with the SEA Regulation of 2004.

Like many Core Cities in the UK, Bristol faces major uncertainties as a result of Britain’s departure from the EU. Based on macro-economic analysis of UK regions, a change in Gross Value Added (GVA) due to Brexit scenarios is estimated to be between 0.5- -8% for the South West<sup>14</sup>. An initial response to Central Government from the Bristol Brexit Response Group was published in 2018<sup>15</sup> which explore areas likely to experience change due to Brexit and the terms of the future UK-EU relationship.

Depending on how businesses respond to the UK-EU Trade and Cooperation Agreement, the following will require update in future iterations of the SA: 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; the scale and availability of the UK Shared Prosperity Fund; and the impact on cultural change and value of tourism.

### **Covid-19 pandemic**

As set out above, this Interim SA was also prepared in the context of the global Covid-19 pandemic and introduction of the associated ‘lockdown’ periods and Tiering system. During this period, temporary yet significant changes were also implemented to ensure public health was protected<sup>16</sup>,

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<sup>14</sup> HM Government (2018) EU Exit: Long-term economic impacts (November 2018)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/760484/28\\_November\\_EU\\_Exit\\_-\\_Long-term\\_economic\\_analysis\\_\\_1\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/760484/28_November_EU_Exit_-_Long-term_economic_analysis__1_.pdf)

<sup>15</sup> Bristol City Office (2018). Bristol and Brexit – An initial response to government from the Bristol Brexit Response Group.

<sup>16</sup> The Coronavirus Act 2020<sup>16</sup> was made effective by royal assent on 25 March 2020, granting the UK Government emergency powers to manage the Covid-19 pandemic.

these included: postponing elections and referendums until 6 May 2021<sup>17</sup>, introduction of temporary planning measures, including allowing pubs, restaurants and cafes to provide a food takeaway service; mandates to maintain social distancing and requirement for employees to work from home where possible. Legislation was also passed to temporarily modify consultation procedures and previous requirements for hard copies of documents to be available for inspection<sup>18</sup>.

The outcome of recovery ‘post-lockdown’ remains uncertain and depends on the extent to which a vaccine allows for previous ways of life to return to pre-pandemic levels. The Office for Budget Responsibility (OBR) forecast a fall in growth in 2020 of between 10.6% and 14.3%, whilst the Treasury’s November 2020 survey of independent forecasts for GDP growth showed an average forecast of -11.0% for 2020 and 4.8% for 2021<sup>19</sup>. Current forecasts vary depending on availability of vaccine and the source of speculation, with both ‘V’-, absolute recovery to pre-pandemic levels, and ‘K’-shaped recoveries, for which inequality may increase through growth in some sectors and decline in others.

Due to the current status of the pandemic, it is challenging to incorporate an appraisal of the Local Plan that realistically reflects on the short, medium and longer-term implications of the recovery. Key sustainability issues and the baseline context of Bristol will need to be updated when emerging data becomes more certain.

**Table 2 Implications of the Covid-19 Pandemic**

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

### **Joint Spatial Plan Withdrawal and preparation of the Spatial Development Strategy**

To ensure conformity with strategic level plan-making, the Bristol Local Plan Review March 2019 Consultation Draft was prepared in accordance with strategic policy direction established within the West of England Joint Spatial Plan (‘JSP’). The content of this document and implications for the Local Plan Review is set out in more detail in Section 5.

<sup>17</sup> In line with the Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020.

<sup>18</sup> Environmental Assessment of Plans and Programmes (Coronavirus) (Amendment) Regulations 2020

<sup>19</sup> House of Commons Library – Economic Indicators (18 November 2020) Number 02783.

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.

Under the Combined Authorities (Spatial Development Strategy) Regulations 2018, the West of England Combined Authority is mandated to prepare a Spatial Development Strategy which establishes a reasoned justification for spatial development in the combined authority area and general policies. The Spatial Development Strategy must be consistent with national policies and the EU obligations of the UK. Regulations require that this is supported by a sustainability appraisal.

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. On the 2 November 2020, an online survey and engagement commenced on the broad direction of the Strategy, which concluded on the 14 December 2020.

As part of future updates to the Sustainability Appraisal, it will be necessary to reconsider the strategic context for the Local Plan Review and implications of the SDS, noting that there are currently many unknowns in absence of JSP and housing need.

### **Planning Reform**

On 6 August 2020, the Ministry of Housing, Communities and Local Government (MHCLG) set out plans 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 impact of these reforms could be significant, and the Interim Sustainability Appraisal should be reviewed in light of these emerging proposals. Proposals indicate that Local Plans will be subject to a single statutory 'sustainable development' test<sup>20</sup>.

At the same time, MHCLG also undertook consultation on proposals for measures to improve the effectiveness of the current planning system<sup>21</sup>. The four main proposals are:

- changes to the standard method for assessing local housing need;
- securing of First Homes through developer contributions in the short term until the transition to a new system;
- supporting small and medium-sized builders by temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing; and,

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<sup>20</sup> Proposal 3, Planning for the Future White Paper (August 2020)

<sup>21</sup> MHCLG (August 2020) Changes to the current planning system - consultation on changes to planning policy and regulations

- extending the current Permission in Principle to major development.

Again, the implications of these reforms could be significant, including a revised housing need number for Bristol, implications for new first time buyers and requirements for levels of affordable housing, and extensions to the Permission in Principle.

It should be acknowledged that while the SA Framework is informed by up to-date evidence across a number of indicators, it does not include data that reflects the effects of these four 'shocks' to the SA Framework and baseline evidence. It will be the role of future SA updates to account for any emerging sustainability trends in the wake of the COVID-19 pandemic amongst other socio-economic and political changes at a national and local stage.

### 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 to undertaking a sustainability appraisal which ensures a consistent and methodological approach. Using the 2020 Baseline Update, the SA Framework for the Interim SA 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.
- **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 March 2020 Baseline Update.
- **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 March 2020 Baseline Update is presented in **Appendix 1.2** of this report.

Table 3 Sustainability Appraisal Framework Update (Stage A4 Review)

| Topic                               | Key Sustainability Issues   | Relevant Objective from Scoping Report 2018 (used in this report)  | Decision Making Criteria from Scoping Report 2018  | Proposed Changes to Decision-Making Criteria  | Final Decision-Making Criteria (DMC) (used in this Report)   |
|-------------------------------------|---|--|--|---|--|
| Population, Housing and Communities | <ul style="list-style-type: none"> <li>Above national average population growth, leading to a high demand for new housing in an area with limited land supply.</li> <li>Bristol's population has become increasingly diverse: <ul style="list-style-type: none"> <li>Population of those not 'White British' increasing from 12% (2001) to 22% (2011).</li> <li>Bristol has a relatively young age profile, with more children aged 0-15 than aged 65+. The median age of Bristol's population is below the national average (32.4 years compared to 40.2 years).</li> <li>Over the last 5 years there has been an increase in university student numbers of 8,300 (18%).</li> <li>Decline in the number of EU nationals registering for a National Insurance Number (NINo) in Bristol since the EU Referendum in June 2016.</li> </ul> </li> <li>Concentrated population growth with a rapidly growing population in the central areas of Bristol, with subsequent increasing population densities.</li> <li>Above national average increase in house prices, with a higher housing affordability ratio than England's average. Affordable housing targets not met consistently.</li> <li>Rapid rise in homelessness and households living in temporary accommodation.</li> </ul> <p>Sources: Scoping Report 2018; Bristol Housing Delivery Plan 2017-20, Bristol Housing Market 2017, The Population of Bristol 2019; The State of Bristol June 2020.</p> | 1. To ensure an adequate and diverse supply of housing that is affordable to everyone.   | <ul style="list-style-type: none"> <li>Would development provide sufficient housing to meet the identified needs of all communities within the city?</li> <li>Would development provide an appropriate mix of types of housing to meet the identified needs of all communities within the city?</li> </ul> | <ul style="list-style-type: none"> <li><b>Retain:</b> Would development <u>or policy</u> provide sufficient housing to meet the identified needs of all communities within the city?</li> <li><b>Additional:</b> <u>Would the development or policy ensure an adequate contribution to affordable housing?</u><br/><b>Informed by:</b> 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.</li> <li><b>Refinement:</b> 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><br/><b>Informed by:</b> Managing the development of HMOs – Draft SPD (Consultation Version).</li> <li><b>Additional:</b> <u>Would the development or policy enable alternative methods of delivery, including community-led and self-build?</u><br/><b>Informed by:</b> National Design Guide (2019).</li> </ul> | <ul style="list-style-type: none"> <li><b>DMC1:</b> Would development or policy provide sufficient housing to meet the identified needs of all communities within the city?</li> <li><b>DMC2:</b> Would the development or policy ensure an adequate contribution to affordable housing?</li> <li><b>DMC3:</b> 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?</li> <li><b>DMC4:</b> Would the development or policy enable alternative methods of delivery, including community-led and self-build?</li> </ul> |
|                                     |   | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land.                               | <ul style="list-style-type: none"> <li>Would development provide an opportunity for the reuse or regeneration of previously developed land and/or increase in density?</li> <li>Would development result in the loss of greenfield land?</li> </ul>  | <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development or policy provide an opportunity for the reuse or regeneration of previously developed land <u>and/or increase in density?</u></li> <li><b>Additional:</b> <u>Would development or policy provide an opportunity for a higher density within a sustainable location?</u><br/><b>Informed by:</b> NPPF (February 2019); Urban Living SPD; Bristol Transport Strategy 2019; Planning for the Future: Preliminary Planning White Paper 2020.</li> <li><b>Refinement:</b> Would development or policy <del>result in the loss of</del> maintain greenfield land and maintain the openness and permanence of the Green Belt?<br/><b>Informed by:</b> NPPF (February 2019).</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC5:</b> Would development or policy provide an opportunity for the reuse or regeneration of previously developed land?</li> <li><b>DMC6:</b> Would development or policy provide an opportunity for a higher density within a sustainable location?</li> <li><b>DMC7:</b> Would development or policy maintain greenfield land and maintain the openness and permanence of the Green Belt?</li> </ul>  |
|                                     |   | 3. Ensure easy and affordable access to key services.  | <ul style="list-style-type: none"> <li>Would development result in a net gain of community or service facilities?</li> <li>Would development be ensured to be within easy walking distance of key services (e.g. GP, Post office, community centre)?</li> </ul>  | <ul style="list-style-type: none"> <li><b>Retain:</b> Would development <u>or policy</u> result in a net gain of community or service facilities?</li> <li><b>Retain:</b> 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)?<br/><b>Informed by:</b> BCC Corporate Strategy 2018 – 2023.</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC8:</b> Would development be within, or would policy ensure development is within, easy walking distance of key services (e.g. GP, post office, community centre)?</li> </ul>  |
|                                     |   | 4. Increase participation in cultural and community activities.  |  |   | <ul style="list-style-type: none"> <li><b>DMC9:</b> Would development or policy result in a net gain of community or service facilities?</li> </ul>  |
|                                     |   | 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"> <li>Would development result in an improved built environment for deprived areas?</li> <li>Would development offer potential for regeneration or investment in deprived areas?</li> </ul>   | <ul style="list-style-type: none"> <li><b>Retain:</b> Would <u>development or policy</u> contribute to improvements in the built environment in deprived areas?</li> <li><b>Retain:</b> Would <u>development or policy</u> offer potential for regeneration or investment in deprived areas (i.e. <u>new homes, jobs and infrastructure</u>)?</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC10:</b> Would development or policy contribute to improvements in the built environment in deprived areas?</li> <li><b>DMC11:</b> Would development or policy offer potential for regeneration or investment in deprived areas (i.e. new homes, jobs and infrastructure?)</li> </ul>  |
|                                     |   | 6. To reduce health inequalities and promote healthy lifestyles across the   | <ul style="list-style-type: none"> <li>Would development contribute to positive wellbeing, e.g. access to open space and pleasant</li> </ul>   | <ul style="list-style-type: none"> <li><b>Additional:</b> <u>Would development or policy contribute to improving air quality?</u><br/><b>Informed by:</b> UK Clean Air Strategy; Bristol City Council Clean Air Plan.</li> <li><b>Refinement:</b> Would <u>development or policy</u> contribute to positive</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC12:</b> Would development or policy contribute to improving air quality?</li> <li><b>DMC13:</b> Would development or policy contribute to positive wellbeing and</li> </ul>   |
| Health and Inequalities             | <ul style="list-style-type: none"> <li>Bristol contains some of the most deprived areas in the country, and therefore contains areas which score low ranks in Indices of Deprivation. For the majority of local authority measures, Bristol does continue to have lower levels of deprivation relative to the other English Core Cities.</li> <li>A slightly lower proportion of Bristol's population live in the most deprived areas in England in 2019 than in 2015 - 15% of residents (70,400 people) live in</li> </ul>   |  |  |   |  |

| Topic                  | Key Sustainability Issues   | Relevant Objective from Scoping Report 2018 (used in this report)                          | Decision Making Criteria from Scoping Report 2018  | Proposed Changes to Decision-Making Criteria  | Final Decision-Making Criteria (DMC) (used in this Report)   |
|------------------------|---|--|--|---|--|
|                        | <p>the most deprived 10% of areas.</p> <ul style="list-style-type: none"> <li>A significant gap in life expectancy between most and least deprived areas, which is generally lower than the national average.</li> <li>Mental health issues are more prevalent within Bristol’s population than nationally, and are associated with the city’s higher education establishments<sup>22</sup>.</li> <li>Disparity across the city in terms of educational attainment, with deprived areas well below the national average: <ul style="list-style-type: none"> <li>Approximately 27% of Bristol pupils are classified as ‘disadvantaged’<sup>23</sup>.</li> <li>7.7% of 16-17 year olds (2018/19) were “not in education, employment or training” (NEET)<sup>19</sup>, worse than national average (5.5%).</li> </ul> </li> <li>Child poverty and fuel poverty continue to be higher than the national average. A total of 5% of households have experienced moderate to severe “food insecurity” in the last 12 months.</li> <li>In terms of active lifestyles and environment: <ul style="list-style-type: none"> <li>There is a high rate of obesity in the city.</li> <li>Air quality exceeds legal limits in parts of the city, which has health implications.</li> <li>The number of people cycling to work in Bristol increased to 11.35% in 2019, up from 10% in 2018.</li> </ul> </li> </ul> <p>Sources: Scoping Report 2018; Bristol Transport Strategy, Traffic Clean Air Zones – Consultation Report 2019; BCC School Census Jan 2019; The State of Bristol June 2020.</p> | city.  | <p>surroundings and living conditions, freedom from noise and pollution?</p> <ul style="list-style-type: none"> <li>Would development make walking and cycling easy and attractive as routine methods of transport, and also facilities healthy eating choices?</li> </ul>   | <p>wellbeing and <u>healthy lifestyles, including good living conditions and access to open spaces, pleasant surroundings and healthier food choices?</u></p> <p><b>Informed by:</b> Updated PPG and Bristol Health and Well-being Strategy 2020-2025; New Protection for Open Space – Consultation.</p> <ul style="list-style-type: none"> <li><b>Retained:</b> Would development or policy make walking and cycling easy and attractive as routine methods of transport?</li> </ul>   | <p>healthy lifestyles, including good living conditions and access to open spaces, pleasant surroundings and healthier food choices?</p> <ul style="list-style-type: none"> <li><b>DMC14:</b> Would development or policy make walking and cycling easy and attractive as routine methods of transport?</li> </ul>   |
|                        |   | 7. Ensure access to education and learning for all sections of society.                    | <ul style="list-style-type: none"> <li>Would development result in a net gain of educational facilities?</li> <li>Would development be ensured to be within easy walking distance of educational services?</li> </ul>  | <ul style="list-style-type: none"> <li><b>Retain:</b> Would development <u>or policy</u> result in a net gain of adequate educational facilities?</li> <li><b>Retain:</b> Would development <u>or policy</u> ensure that educational services are located within easy walking distance?</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC15:</b> Would development or policy result in a net gain of adequate educational facilities?</li> <li><b>DMC16:</b> Would development or policy ensure that educational services are located within easy walking distance?</li> </ul>   |
| Economy and Employment | <ul style="list-style-type: none"> <li>Bristol has the highest employment rate of the Core Cities, and productivity was also high than other Core Cities. The employment rate has been broadly increasing for the last 12 years, from 72% in 2004/05 to 77% in 2016/17.</li> <li>Strong SME community in Bristol; with around 2,800 businesses created within the city each year on average and around 44% surviving into their fifth year.</li> <li>Bristol continues to have deprivation</li> </ul>   | 8. To support the economy and ensure that there are suitable opportunities for employment. | <ul style="list-style-type: none"> <li>Would development provide a range of high-quality employment land to meet the identified needs of all communities within the city</li> <li>Would development regenerate or provide employment opportunities in areas that are currently experiencing high rates of</li> </ul> | <ul style="list-style-type: none"> <li><b>Refinement:</b> 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?<br/><b>Informed by:</b> Draft SBSUD Strategy 2018.</li> <li><b>Additional:</b> <u>Would development or policy support opportunities for growth (i.e. creation of employment spaces, supporting infrastructure etc.) in priority employment sectors?</u><br/><b>Informed by</b> 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)</li> </ul> | <ul style="list-style-type: none"> <li><b>DMC17:</b> 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?</li> <li><b>DMC18:</b> Would development or policy support opportunities for growth (i.e. creation of employment spaces, supporting infrastructure etc.) in priority employment sectors?</li> <li><b>DMC19:</b> Would development or policy</li> </ul> |

<sup>22</sup> <https://www.bbc.co.uk/news/uk-england-bristol-45976340>

<sup>23</sup> BCC School Census, Jan 2019, and Pupil Premium data July 2019, covering Bristol school age pupils aged 5-16 yrs, in BCC schools & academies. Disadvantaged is defined as pupils who have “ever been In Care, been adopted or been eligible for free school meals at any point in the last 6 years”.

| Topic                   | Key Sustainability Issues   | Relevant Objective from Scoping Report 2018 (used in this report)   | Decision Making Criteria from Scoping Report 2018   | Proposed Changes to Decision-Making Criteria  | Final Decision-Making Criteria (DMC) (used in this Report)   |
|-------------------------|---|---|---|---|--|
|                         | <p>'hotspots' that are amongst some of the most deprived areas in the country.</p> <ul style="list-style-type: none"> <li>Perception amongst employers interviewed within the Business West Skills and Training Survey 2018 and Avonmouth &amp; Severnside Enterprise Area Survey 2017, that lower skilled jobs in the logistics sector are becoming increasing hard to fill.</li> <li>Pressure on city centre land to meet the needs of commercial and residential space. The Bristol EDNA (2016) set out the implications of recent trends on supply: a loss of 174,131sq m of city centre office floorspace, predominantly in second-hand stock for conversion to residential accommodation; net losses within the City Centre and South and a net increase at Avonmouth.</li> </ul> <p>Sources: Scoping Report 2018; Deprivation in Bristol 2019; Inclusive and Sustainable Economic Growth Strategy (2018); Bristol Economic Briefing 2019; West of England Economic Development Needs Assessment (2016)</p> | <p>9. Ensure access to a range of shopping facilities for all sections of society.</p>  | <p>unemployment?</p> <ul style="list-style-type: none"> <li>Would development result in the loss of any existing strategic employment opportunities?</li> </ul> <p>Would development offer the opportunity to support and enhance the vitality and viability of retail centres?</p> <ul style="list-style-type: none"> <li>Would development be ensured to be within easy walking distance of retail services?</li> </ul> | <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development <u>or policy</u> regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment?<br/><b>Informed by:</b> Draft SBSUD Strategy 2018; Bristol One City Plan</li> <li><b>Refinement:</b> Would development or policy maintain <del>result in the loss of any</del> existing strategic employment opportunities?</li> <li><b>Additional:</b> <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><br/><b>Informed by:</b> BCC Climate Strategy; Draft SBSUD Strategy 2018; Bristol One City Plan</li> </ul> <p>Would development <u>or policy</u> enhance and diversify the vitality and viability of local / retail centres?</p> <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development be, or policy ensure, development is within easy walking distance of retail services?</li> </ul> | <p>regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment?</p> <ul style="list-style-type: none"> <li><b>DMC20:</b> Would development or policy maintain existing strategic employment opportunities?</li> <li><b>DMC21:</b> 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?</li> <li><b>DMC22:</b> Would development or policy enhance and diversify the vitality and viability of local / retail centres?</li> <li><b>DMC23:</b> Would development be, or policy ensure, development is within easy walking distance of retail services?</li> </ul> |
| Townscape and Landscape | <ul style="list-style-type: none"> <li>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"> <li>Bristol contains a substantial number of designated heritage assets.</li> <li>Bristol has 33 conservation areas.</li> </ul> </li> <li>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"> <li>Bristol's Wildlife network is 3,000 hectares protecting 27% of the land area in the city.</li> <li>Over 3,800 allotment plots are located within the city.</li> <li>Ensuring significant green infrastructure assets are retained.</li> </ul> </li> </ul> <p>Source: Scoping Report 2018; The State of Bristol June 2020.</p>   | <p>10. To ensure the protection and enhance historic environment and its setting.</p> <p>11. To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats.</p> <p>12. To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation.</p> | <ul style="list-style-type: none"> <li>Would development result in the degradation of heritage assets?</li> <li>Would development result in the degradation of biological and geological assets?</li> <li>Would development offer the opportunity to enhance or result in a net gain to GI?</li> </ul>  | <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development or policy avoid <del>result in the</del> degradation of heritage assets, townscape and landscape?<br/><b>Informed by:</b> Urban Living SPD.</li> <li><b>Refinement:</b> Would development or policy protect biological, geological and nationally or internationally designated nature conservation assets from adverse effects?<br/><b>Informed by:</b> Natural England response to SA Scoping 2018</li> <li><b>Additional:</b> <u>Would development or policy enable a net gain in biodiversity?</u><br/><b>Informed by:</b> NPPF 2019; National Design Guide; 25-Year Environment Plan.</li> <li><b>Refinement:</b> Would <u>development or policy maximise</u> the opportunity to <u>provide multifunctional green infrastructure?</u><br/><b>Informed by:</b> BCC Climate Strategy; NPPF 2019; National Design Guide; 25-Year Environment Plan.</li> </ul>   | <ul style="list-style-type: none"> <li><b>DMC24:</b> Would development or policy avoid degradation of heritage assets, townscape and landscape?</li> <li><b>DMC25:</b> Would development or policy protect biological, geological and nationally or internationally designated nature conservation assets from adverse effects?</li> <li><b>DMC26:</b> Would development or policy enable a net gain in biodiversity?</li> <li><b>DMC27:</b> Would development or policy maximise the opportunity to provide multifunctional green infrastructure?</li> </ul>  |
| Transport and Movement  | <ul style="list-style-type: none"> <li>Transport is responsible for 32% of carbon dioxide (CO2) emissions in the West of England, compared to 26% nationally. Emissions could rise by a further 22% across the West of England by 2036 if action is not taken to address</li> </ul>   | <p>13. To encourage a demonstrable modal shift and reduce the need to travel.</p>   | <ul style="list-style-type: none"> <li>Would development offer an opportunity to improve access to and quality of sustainable transport modes for all communities, to allow sustainable</li> </ul>  | <ul style="list-style-type: none"> <li><b>Refinement:</b> 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, <del>to allow sustainable movement throughout the city?</del><br/><b>Informed by:</b> BCC Climate Strategy; Bristol One City Plan; updated PPG and National Design Guide; Bristol Transport Strategy 2019; West of</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC28:</b> 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?</li> <li><b>DMC29:</b> Would development or policy</li> </ul>   |

| Topic                     | Key Sustainability Issues  | Relevant Objective from Scoping Report 2018 (used in this report)   | Decision Making Criteria from Scoping Report 2018   | Proposed Changes to Decision-Making Criteria   | Final Decision-Making Criteria (DMC) (used in this Report)   |
|---------------------------|--|---|---|--|--|
| Climate, Energy and Waste | <p>these at a regional and local level.</p> <ul style="list-style-type: none"> <li>Congestion continues to impede movement particularly in the city centre.</li> <li>High car ownership-levels, being the second highest of the Core Cities. With a number of new transport schemes coming forward (such as Metrobus), there is a need to ensure that growth is integrated.</li> <li>Increase in the number of bus passenger journeys (35% between 2013/14 and 2018/19).</li> <li>Increased uptake of cycling as a mode of transportation within the city, doubling in use over the last 10 years.</li> </ul> <p>Sources: Scoping Report 2018; Joint Local Transport Plan 4 (2020); BCC Draft Local Plan (2019).</p>   |   | <p>movement throughout the city?</p> <ul style="list-style-type: none"> <li>Would development offer an opportunity to support the delivery of new transport infrastructure?</li> </ul>  | <p>England Local Cycling and Walking Infrastructure Plan.</p> <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development <u>or policy</u> offer an opportunity to support the delivery of new transport <u>and digital</u> infrastructure?<br/><b>Informed by:</b> Bristol Transport Strategy 2019; Bristol One City Plan.</li> </ul>   | <ul style="list-style-type: none"> <li>offer an opportunity to support the delivery of new transport and digital infrastructure?</li> </ul>  |
|                           |  | 14. To maintain and improve the existing highway network.   | <ul style="list-style-type: none"> <li>Would development likely bring an increase in levels of traffic, and is this in an area already experiencing congestion issues?</li> <li>Would development offer an opportunity to enhance or improve the existing network?</li> </ul> | <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development <u>or policy</u> likely bring an increase in levels of traffic in an area already experiencing congestion issues?</li> <li><b>Refinement:</b> Would development <u>or policy</u> offer an opportunity to enhance or improve the existing highway network?</li> </ul>   | <ul style="list-style-type: none"> <li><b>DMC30:</b> Would development or policy likely bring an increase in levels of traffic in an area already experiencing congestion issues?</li> <li><b>DMC31:</b> Would development or policy offer an opportunity to enhance or improve the existing highway network?</li> </ul>   |
|                           | <ul style="list-style-type: none"> <li>Whilst CO2 emissions have decreased by 33% since 2005, Bristol's current carbon emissions projection would not meet carbon neutral target by 2030.</li> <li>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.</li> <li>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.</li> <li>Bring up water quality to a 'good' rating: The River Frome, Brislington Brook, Malago, River Trym and Colliter's Brook do not currently achieve 'Good Ecological Status' against the WFD due to impacts from flood protection / land drainage schemes and development.</li> <li>Reducing non-renewable energy use. There is a need to adapt to potential effects of climate change, including flooding, sea level rise and urban heat island effect</li> <li>Continuing to reduce waste being landfilled: 15.9% of municipal waste was sent to landfill (2019/20), which was significantly less waste per household than 2016/17.</li> </ul> | 15. To reduce the risk of flooding from all sources.  | <ul style="list-style-type: none"> <li>Would development be directed towards lower flood risk areas or offer opportunities to significantly reduce flood risk?</li> <li>Would development promote the use of sustainable drainage systems?</li> </ul>                         | <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development <u>or policy</u> be directed towards lower flood risk areas <u>and/</u> or offer opportunities to significantly reduce flood risk?</li> <li><b>Informed by:</b> BCC Climate Strategy</li> <li><b>Additional:</b> <u>Would development or policy support sustainable and resilient flood risk management?</u></li> <li><b>Informed by:</b> BCC Climate Strategy</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC32:</b> Would development or policy be directed towards lower flood risk areas and / or offer opportunities to significantly reduce flood risk?</li> <li><b>DMC33:</b> Would development or policy support sustainable and resilient flood risk management?</li> </ul>  |
|                           |  | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled. | <ul style="list-style-type: none"> <li>Would development have an effect on water resources?</li> <li>Would development likely have an effect on water quality and would it provide opportunity to improve water quality?</li> </ul>   | <ul style="list-style-type: none"> <li><b>Retain:</b> Would development <u>or policy</u> have a <u>beneficial</u> effect on water resources?<br/><b>Informed by:</b> 25-Year Environment Plan objectives; Updated PPG; Wessex Water Resources Management Plan (2019)</li> <li><b>Retain:</b> Would development <u>or policy</u> likely have an effect on water quality, and would it provide opportunity to improve water quality?</li> <li><b>Additional:</b> <u>Would development or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production?</u><br/><b>Informed by:</b> BCC Climate Strategy; Bristol One City Plan; Urban Living SPD</li> <li><b>Additional:</b> <u>Would development or policy maximise opportunities to support sustainable urban food production?</u><br/><b>Informed by:</b> Bristol One City Plan.</li> </ul> | <ul style="list-style-type: none"> <li><b>DMC34:</b> Would development or policy have a beneficial effect on water resources?</li> <li><b>DMC35:</b> Would development or policy likely have an effect on water quality, and would it provide opportunity to improve water quality?</li> <li><b>DMC36:</b> Would development or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production?</li> <li><b>DMC37:</b> Would development or policy maximise opportunities to support sustainable urban food production?</li> </ul> |
|                           |  | 17. Minimise air and noise pollution  | <ul style="list-style-type: none"> <li>Would development minimise exposure to pollution or offer opportunity to reduce pollution?</li> </ul>  | <ul style="list-style-type: none"> <li><b>Retain:</b> Would development minimise exposure to pollution or offer opportunity to reduce pollution?</li> <li><b>Informed by:</b> Updated PPG; Clean Air Strategy 2019; Air Quality Plan for NO2 in the UK; WHO Strategy<sup>24</sup>).</li> </ul>   | <ul style="list-style-type: none"> <li><b>DMC38:</b> Would development minimise exposure to pollution or offer opportunity to reduce pollution?</li> </ul>   |
|                           |  | 18. To maximise the potential for energy  | <ul style="list-style-type: none"> <li>Would aspirational targets for energy efficiency in new</li> </ul>   | <ul style="list-style-type: none"> <li><b>Refinement:</b> Would development <u>or policy</u> enable aspirational targets for energy efficiency to be achieved?</li> </ul>  | <ul style="list-style-type: none"> <li><b>DMC39:</b> Would development or policy enable aspirational targets for energy</li> </ul>   |

<sup>24</sup> The Strategy sets out a long-term target to reduce the population's exposure to PM2.5.

| Topic | Key Sustainability Issues   | Relevant Objective from Scoping Report 2018 (used in this report)  | Decision Making Criteria from Scoping Report 2018  | Proposed Changes to Decision-Making Criteria   | Final Decision-Making Criteria (DMC) (used in this Report)  |
|-------|---|--|--|--|---|
|       | <p>Sources: Scoping Report 2018; Bristol One City Climate Strategy; BCC Corporate Strategy 2018-2023; The State of Bristol June 2020.</p> | <p>efficiency, reduce greenhouse gas emission and ensure that the built and natural environment and its communities can withstand the effects of climate change.</p> | <p>development be set?</p> <ul style="list-style-type: none"> <li>• Would development provide opportunities for a net gain in renewable energy production within the Plan area?</li> <li>• Does the option ensure that new development is resilient to the effects of climate change?</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Refinement:</b> 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?<br/><b>Informed by:</b> Updated PPG; BCC Climate Strategy; West of England Industrial Strategy 2019; updated PPG; SUD Strategy 2018; updated PPG and incoming Planning White Paper<sup>25</sup></li> <li>• <b>Additional:</b> <u>Would development or policy provide opportunities for the use of low carbon and decentralised energy sources (including energy networks)?</u><br/><b>Informed by:</b> BCC Climate Strategy.</li> <li>• <b>Refine:</b> Would development or policy <u>increase resilience</u> to the effects of climate change?</li> </ul> | <p>efficiency to be achieved?</p> <ul style="list-style-type: none"> <li>• <b>DMC40:</b> Would development or policy provide opportunities for a net gain in renewable energy production and zero carbon energy supply within the Plan area?</li> <li>• <b>DMC41:</b> Would development or policy provide opportunities for the use of low carbon and decentralised energy sources (including energy networks)?</li> <li>• <b>DMC42:</b> Would development or policy increase resilience to the effects of climate change?</li> </ul> |

<sup>25</sup> 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 for the Interim SA 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 Draft Policies DS1 – 14);
- Site Allocations (Draft Policy DA1) (**Appendix 4**);
- Industrial and Distribution 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 2020 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           |   |
|----------------------------------|---|
| <b>Probability and Frequency</b> | <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"> <li>• <b>Uncertainty</b> – it is unclear whether the effect will occur as assessed (?); and</li> <li>• <b>More certainty</b> – the effect is likely to occur as assessed (no symbol).</li> </ul> <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>         |
| <b>Duration</b>                  | <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"> <li>• <b>Short-term</b> – those effects that occur within the <b>first five years</b> of implementation of the new Local Plan;</li> <li>• <b>Medium-term</b> – those effects that occur between <b>five and fifteen years</b> following the adoption of the new Local Plan; and</li> <li>• <b>Long-term</b> – those effects that will occur <b>beyond fifteen years</b> (including those that will endure beyond the plan period such as Green Belt designation).</li> </ul> |
| <b>Reversibility</b>             | Effects may be <b>temporary (T)</b> or <b>permanent (P)</b> in nature.  |
| <b>Spatial scale</b>             | <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"> <li>• <b>Local</b> (affecting a locality for example Redcliffe or Bedminster)</li> <li>• <b>City-wide</b> (affecting the whole Plan area)</li> <li>• <b>City-wide and transboundary</b> (affecting the Plan area and beyond)</li> </ul>   |

### 3.6 Summarising the ‘Current Situation’

Section 4, 5, 6 and 7 of this Main Report assess the March 2019 Consultation Draft reasonable alternatives policies, draft 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 1.1**) and March 2020 Baseline Update (**Appendix 1.2**).

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 in Section 3.4, Table 6 summarises the

‘current situation’ and the ‘likely evolution without the Plan’ as set out within Appendix 1.1 and Appendix 1.2.

**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 Wider Bristol SHMA (2015, updated 2018)<sup>26</sup> identified that the overall housing need for the wider Bristol area was for 86,959 dwellings per annum between 2016 and 2036, which included a total of 26,900 dwellings across the Wider Bristol HMA. As this housing need was set by a strategic level plan, in absence of the plan, meeting this housing need would be less-coordinated and would not achieve cross-boundary collaboration across the housing market area level.</p> <p>Housing delivery and housing affordability remains a key issue, where Bristol has experienced an above national average increase in house prices (70% 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 Wider Bristol SHMA identified that 29% of all new homes required needed to be affordable, however 54% of the Affordable Housing need arises from the Bristol City Council area.</p> <p>Whilst affordable housing targets within the Core Strategy have not been met consistently across 2006-2018, 60% of the total supply had been achieved. 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 values<sup>27</sup>. Without intervention, affordability issues and supply are likely to increase.</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>The vast majority of new homes delivered since the adoption of the Core Strategy have been 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 33,500 homes within Bristol would be achieved.</p> |
| Health and inequalities             |                   |                            | <p>Bristol contains some of the most deprived areas in the country, with 27 LSOAs falling within the most deprived ranks of the Index of Multiple Deprivation 2019.</p> <p>Of these, only four LSOAs in Lawrence Hill and Ashley have moved out of the 10% decile since 2015, whilst at the same time four LSOAs have moved into the worst performing 10% (Filwood, Avonmouth, Hengrove, and Hillfields). Whilst</p>  |

<sup>26</sup> ORS (2015, 2018) Wider Bristol HMA Strategic Housing Market Assessment

<sup>27</sup> SD14J Topic Paper 6 Affordable Housing April 2018

| SEA Topic               | Current situation | Likely future without Plan | Key sustainability issues  |
|-------------------------|-------------------|----------------------------|--|
|                         |                   |                            | <p>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> <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 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, 7.7% of 16-17 year olds (2018/19) were “<i>not in education, employment or training</i>” (NEET), higher than national average (5.5%). 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>Other data indicates that there has been an uptake in the use of active travel and public transport within the city, generating positive outcomes for public health. However, the level of car ownership remains high (the second highest of the UK Core Cities).</p> |
| Economy and employment  |                   |                            | <p>Bristol has had strong economic performance with strong 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"> <li>• Approximately a fifth of the City’s land area is given over to various forms of green spaces.</li> <li>• Bristol’s Wildlife network is 3,000 hectares protecting 27% of the land area in the city.</li> <li>• 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.</li> <li>• Numerous locally designated Sites of Nature Conservation Interest (SNCI) and Local Nature Reserves cover the Plan area.</li> <li>• Over 3,800 allotment plots are located within the city.</li> </ul> <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 level.</p> <p>Whilst there has been an increase in the number of bus passenger users and an</p>   |

| SEA Topic                 | Current situation | Likely future without Plan | Key sustainability issues   |
|---------------------------|-------------------|----------------------------|---|
|                           |                   |                            | 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 target by 2030.</p> <p>In addition, the River Frome, Brislington Brook, Malago, River Trym and Colliter's Brook do not 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 not possible as planning policy is currently the only tool for the delivery of renewable energy technology 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 the Interim Sustainability Appraisal 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 environmental 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 1.1** '2018 Scoping Report' and **Appendix 1.2** 'March 2020 Baseline Update').
- Adopting a proportionate approach, the March 2020 Baseline Update does not seek to undertake a wholesale review of all baseline data and figures included within the 2018 Scoping Report. Instead, it was predominantly reviewed in March 2020, and subsequently updated when new information emerged during preparation of the Interim Report 2020. The purpose of this was to develop a baseline 'current situation' of sustainability issues and revised SA Framework to appraise the emerging policies against (see Table 6). This will continue to be updated as the plan evolves.
- 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 GRAs'), or a judgement made against the baseline 'current situation' where this was not achievable. Effects have therefore been assessed as accurately as possible given the availability of information, or recommendations for additional evidence to support justification are made.

- It is recommended that future stages of the SA include updates to both the baseline and objectives to capture 'sustainability issues' which are still emerging. These include the implications of compliance with the Spatial Development Strategy on the JSP and the impacts of the Planning for the Future White Paper 2020, alongside the macro-economic impacts of the UK withdrawal from the EU and Coronavirus / Covid-19 pandemic.

## 4. Testing the Local Plan Review Objectives against the Sustainability Appraisal Framework (Stage B1)

### 4.1 Overview

The Local Plan Review: Draft Policies and Development Allocations – Consultation (March 2019) sets out the new vision for the plan period to 2036, the rationale for Review and revised Local Plan Review aims.

As the Local Plan Review will focus on setting out the new spatial strategy for development in Bristol 2036, 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 guidance<sup>28</sup>, there is a need to assess the compatibility of the Local Plan Review objectives with the SA objectives.

### 4.2 Establishing the approach to testing Local Plan Review Objectives

To minimise duplication and ensure a proportionate assessment, the main elements from the vision for the Local Plan Review 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 Review vision (March 2019)**

**By 2020...** the new local plan will be in place...2,000 homes a year will be being built across the city. At least 800 of those homes will be affordable – 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.

**By 2025...** a further 10,000 new and affordable homes will have been built and the city will be reaching a population of 500,000 people within a growing West of England. New developments and transport schemes will be underway across the city and new communities will be emerging. Bristol will be well on the way to achieving its carbon reduction target.

**By 2035...** at least 33,500 new homes, served by new transport services, will have been completed across the city since the plan review started. 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.

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<sup>28</sup> Paragraph: 013 Reference ID: 11-013-20140306 Stage B.1

**Table 7 Condensing Vision and Plan Objectives**

| <b>Plan Objectives: Emerging from the Rationale for Review and Local Plan Aims</b> |           |   | <b>Reflected in the vision</b> |
|--|-----------|---|--------------------------------|
| <b>Rationale for Review</b>  | <b>1</b>  | Setting out an approach to inclusive and sustainable growth and development, addressing the needs of everyone in all parts of the city  | Reflected                      |
|  | <b>2</b>  | Enabling of delivery of at least 33,500 new homes in Bristol by 2036 including affordable housing and homes to meet a range of needs  | Strongly reflected             |
|  | <b>3</b>  | Aiming to exceed our housing target where new infrastructure can unlock additional potential  | Strongly reflected             |
|  | <b>4</b>  | Enabling growth of our economy for everyone, with modern workplaces and digital infrastructure fit for the future   | Reflected                      |
| <b>Local Plan Aims</b>   | <b>5</b>  | 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             |
|  | <b>6</b>  | Enable growth of our economy for everyone, with modern workplaces and digital infrastructure fit for the future   | Reflected                      |
|  | <b>7</b>  | 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             |
|  | <b>8</b>  | 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 | Reflected                      |
|  | <b>9</b>  | 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                      |
|  | <b>10</b> | Make sure residential sites are reserved for development of new and affordable homes and not unnecessarily used for other purposes  | Strongly reflected             |
|  | <b>11</b> | 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                         | Reflected                      |
|  | <b>12</b> | Manage the development of student housing to safeguard existing communities and support delivery of new homes whilst supporting thriving universities   | Reflected                      |
|  | <b>13</b> | Protect our valued open spaces to support a liveable, healthy city  | Reflected                      |
|  | <b>14</b> | Make sure new buildings protect the environment, working towards zero carbon development and adapting to the likely impact of climate change  | Strongly reflected             |
|  | <b>15</b> | Tackle the challenges of air quality, obesity and environmental quality   | Reflected                      |

Table 8 below tests the Local Plan vision, rationale for review 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   | Local Plan Review rationale |    |    | Local Plan aims |     |    |     |     |    |    |    |    |    |    |    |  |
|-------------------------------------|--|-----------------------------|----|----|-----------------|-----|----|-----|-----|----|----|----|----|----|----|----|--|
|                                     |  | 1                           | 2  | 3  | 4               | 5   | 6  | 7   | 8   | 9  | 10 | 11 | 12 | 13 | 14 | 15 |  |
| Population, Housing and Communities | 1.To ensure an adequate and diverse supply of housing that is affordable to everyone   | +                           | ++ | ++ | 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  |  |
|                                     | 3. Ensure easy and affordable access to key services   | +                           | 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  | +  |  |
| 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  | +  |  |
|                                     | 6. To reduce health inequalities and promote healthy lifestyles across the city  | 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  |  |
| Economy and Employment              | 8. To support the economy and ensure that there are suitable opportunities for employment  | +                           | 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  |  |
| Townscape and Landscape             | 10. To ensure the protection and enhancement of the historic environment and its setting   | ?                           | ?  | ?  | ?               | ?   | ?  | ?   | ?   | ?  | ?  | ?  | ?  | +  | ++ | +  |  |
|                                     | 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats  | ?                           | ?  | ?  | ?               | ?   | ?  | ?   | ?   | ?  | ?  | ?  | ?  | ++ | ++ | +  |  |
| Transport and Movement              | 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  | +                           | +  | +  | +               | ?   | +  | +   | +   | +  | 0  | 0  | 0  | 0  | 0  | +  |  |
| Climate, Energy and Waste           | 14. To maintain and improve the existing highway network   | +                           | 0  | +  | ?               | 0   | ?  | 0   | 0   | 0  | 0  | 0  | 0  | 0  | 0  | 0  |  |
|                                     | 15. To reduce the risk of flooding from all sources  | ?                           | ?  | 0  | ?               | ?   | ?  | ?   | ?   | ?  | ?  | ?  | ?  | +  | +  | +  |  |
|                                     | 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 | ?                           | ?  | ?  | +               | ?   | +  | ?   | ?   | ?  | ?  | ++ | 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 Local Plan Review aims and objectives, and SA Objectives

Based on Table 8 there are a number of potential conflicts, either incompatibilities or uncertainties, which will require further consideration in future iterations of the Local Plan Review and associated Sustainability Appraisal. These include:

- **Local Plan Review aim 5 and SA Objectives 8- 9:** There is potential conflict between the drive for housing as ‘core objective’ in development decisions (Local Plan Review 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 Review aims 2, 3, 7, 9, 10 and 11. 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.
- **Local Plan Review aims 1-6, 9, 10 and SA Objectives 10-12:** There is relatively limited reference within the Local Plan Review objectives or aims to conserving and enhancing the natural and historic environment. With the exception of Local Plan aims 13 to 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. Whilst it is implied that that development would be ‘well-designed’ in aim 7, stronger reference could be made to conserving or enhancing townscape and landscape or achieving biodiversity net gain / environmental net gain as set out in Objective 10 - 12.  
**Recommendation:** Local Plan Review aims could include reference to delivery of both protection and enhancement of the historic and natural environment and townscape, to reflect updating wording of Interim Report 2020 decision-making criteria.
- **Local Plan Review aim 5 and Local Plan Review aim 13, 15:** By seeking to establish an approach which sees development of new and affordable homes as a core objective in development decisions, Local Plan Review aim 5 could create tensions and potential incompatibility in its current wording with Local Plan Review aim 13, ‘Protect our valued open spaces to support a liveable, healthy city’ and Local Plan Review aim 15 ‘Tackle the challenges of air quality, obesity and 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:** Strengthen reference within Local Plan aim 8, to reflect urban environments which achieve health and mental wellbeing as part of all new and affordable homes, with a greater focus on access to outdoor and open spaces.

#### Proposed additional refinements for consideration

- Consider making explicit reference to critical infrastructure provision needed to support development objectives of the Local Plan Review. A part of Local Plan Review aims 3 and 4,

recognise the role of transport infrastructure to meet SA Objectives 13 and 14, utilities and flood risk infrastructure to support SA Objectives 16 – 18.

- Strengthen references to provision of social infrastructure, such as cultural and community activities (SA Objective 4), health infrastructure (SA Objective 6) and education provision (SA Objective 7), in ensuring liveable environments and developing cohesive communities. Encouraging urban living principles, such as mixed uses and higher densities, may also increase the number of receptors with better access to existing social infrastructure provision within the urban area. Therefore, this may be also achieved through strengthening references to provision of social infrastructure, local services and community facilities within ‘mixed-use’ reference’ within the Local Plan aims 7 and 8.
- Disaggregate the issues within Local Plan Review aims 14 and 15, to ensure that there is stronger reference to sustainably managing natural resources, minimising air and noise pollution and reducing the effects of development on greenhouse gas emissions. This change would more clearly communicate/better ensure that the Local Plan meets SA objectives within SEA themes of Climate, Energy and Waste (Objectives 15 - 18) and Health and Inequalities (Objectives 5 - 7).

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

### Overview

The following section of the Interim Sustainability Appraisal seeks to identify, describe and evaluate strategic reasonable alternatives for implementing the Local Plan Review<sup>29</sup>.

The overarching purpose of exploring reasonable alternatives is to identify if there are different strategy or policy options for addressing or reducing impacts on relevant economic, social and environmental SA Objectives and Local Plan objectives<sup>30</sup>. Where any significant adverse impacts are unavoidable through alternative options, suitable mitigations measures are proposed<sup>31</sup>.

In accordance with PPG Stage B<sup>32</sup>, developing and refining alternatives and assessing effects are to be undertaken alongside Regulation 18 consultation periods on the Local Plan.

As the Local Plan evolves, the Sustainability Appraisal should compare all reasonable alternatives, including the preferred approach, and assess these against the baseline environmental economic social characteristics of the area. As an Interim SA, these reasonable alternatives are likely to transform as the Local Plan develops, but in all instances, alternatives should be compared against the likely 'current situation' if the Local Plan Review were not to be adopted<sup>33</sup>. In accordance with the PPG<sup>34</sup> 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 alternatives<sup>35</sup>. The criteria for determining the significance of effects have been set out in Section 3<sup>36</sup>. 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 will need to be documented.

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

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<sup>29</sup> 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)

<sup>30</sup> NPPF 2019, Paragraph 32.

<sup>31</sup> NPPF 2019, Paragraph 32.

<sup>32</sup> Planning Practice Guidance, Paragraph: 013 Reference ID: 11-013-20140306

<sup>33</sup> Planning Practice Guidance, Paragraph: 018 Reference ID: 11-018-20140306

<sup>34</sup> Paragraph: 018 Reference ID: 11-018-20140306

<sup>35</sup> Article 5 (1) and Annex 1(b)

<sup>36</sup> In accordance with Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004

- Reasonable alternatives must take into account the objectives and the geographical scope of the plan or programme<sup>37</sup>. 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 these<sup>38</sup>.
- There are instances where certain matters of the Plan are more appropriately assessed at different planning tier<sup>39</sup> and duplication should be avoided<sup>40</sup>. 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. Where matters formed part of the Joint Spatial Plan and therefore where there are gaps in the overarching spatial strategy, these have been noted and recommendations suggested.
- The identification of reasonable alternatives is focussed on a broad and proportionate approach against the SA objectives<sup>41</sup>. 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 forward<sup>42</sup>.
- Often there may be no other alternatives to an approach which are both realistic and fulfil both the SA Framework and Plan Objectives<sup>43</sup>. 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, whether another approach would be possible and whether location or timing is a consideration<sup>44</sup>.
- In instances where credible and appropriate suggestions have been made, consultation responses have supported the generation of reasonable alternatives<sup>45</sup>.
- Each alternative option has been assessed to the same level of detail<sup>46</sup> 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:

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<sup>37</sup> Article 5(1) and Annex 1 of SEA Environment Assessment of Plans and Programmes Directive

<sup>38</sup> Sustainability Appraisal of Local Development Documents (2005)

<sup>39</sup> Regulation 12 (Part 3) of Environmental Assessment of Plans and Programmes Regulations 2004

<sup>40</sup> 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)

<sup>41</sup> NPPF 2019, Paragraph 31.

<sup>42</sup> A Practical Guide to the SEA Directive (OPDM, 2005)

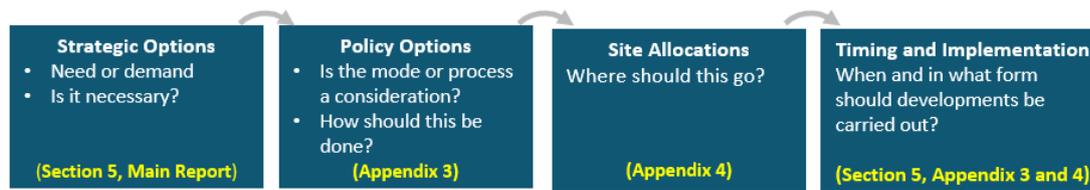
<sup>43</sup> 5.13 of the Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment

<sup>44</sup> A Practical Guide to the SEA Directive (OPDM, 2005)

<sup>45</sup> A Practical Guide to the SEA Directive (OPDM, 2005)

<sup>46</sup> Planning Practice Guidance, Paragraph: 018 Reference ID: 11-018-20140306

Figure 3 Hierarchy of Alternatives



## 5.1 Developing Strategic Options for the Local Plan Review Strategy

### Overview

The following section seeks to set out the options for the Local Plan Review strategy; in essence, alternatives to the assessment of 'need or demand'. The rationale for reviewing 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 Review

As of March 2019, the Bristol Local Plan Review Draft Policies and Development Allocations states that the rewrite of the Local Plan does not propose to change all of its current policies. The policies in the three current Local Plan documents remain broadly relevant, however, the Core Strategy established the need for a five-year cycle on monitoring and review with an interim review date of 2016 and a major review date of 2021. Preparation of the Joint Spatial Plan (JSP) commenced the interim review process for the Core Strategy; with the Publication version of the JSP (November 2017) setting the direction for the Local Plan Review strategy.

The JSP originally set out the overall strategy for the Bristol area. Public consultation on the JSP identified a series of critical issues and challenges that should be addressed within a strategic-level plan. These critical issues and challenges included:

- A critical need to substantially boost the supply of housing, particularly affordable housing;
- The unequal nature of economic prosperity which has not been shared across all communities with pockets of deprivation still existing;
- Significant pressure on infrastructure and over reliance on the private car resulting from the form and function of development in some parts of the West of England; and
- The fact that the sub-region benefits from a world class environment which does bring substantial economic and community benefits.

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. This will be achieved through the delivery of existing local plan commitments, maximising the sustainable development of previously developed land and appropriate opportunities within urban areas ('urban living'), and by enabling non-strategic sustainable growth at locations in the

urban area. The concept of ‘urban living’ refers to the creation of a characterful urban area where people can live, relying on sustainable transport.

- The allocation of a Strategic Development Location (SDL) at Bath Road, Brislington. This enabled the general extent of the Green Belt to be maintained except where it is required to be amended through Local Plans to enable the delivery of the Bath Road SDL. The Local Plan Review was however, required to identify development boundaries for each of these SDLs.
- A target of 24,500 net new affordable dwellings across the West of England. To achieve this, developments delivering 5 or more dwellings or on sites larger than 0.2ha, will be required to deliver a minimum of 35% affordable housing. The JSP recognised that every opportunity will be needed to maximise the delivery of affordable housing for Bristol.
- 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. The employment land requirement was assessed within the Economic Development Needs Assessment (EDNA). 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.

To ensure conformity with strategic level plan-making, the Local Plan was to be updated on the basis of accommodating these key requirements of the JSP. The February 2018 Consultation version of the Local Plan set out that this would be achieved by requiring a new spatial strategy identifying broad locations for new development around the city, supported by individual site allocations for development and policies which promote the delivery of new and affordable homes. As these requirements were set within the JSP, there was considered to be no reasonable alternatives for the strategic options of the Local Plan Review.

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 which establishes a reasoned justification for spatial development in the combined authority area and general policies. It will therefore be necessary to reconsider the strategic context for the Local Plan Review and likely future alternatives, noting that currently a new strategic plan – the WECA Spatial Development Strategy – is in preparation<sup>47</sup>.

The future form and content of the Spatial Development Strategy was evolving during the preparation of the Interim Sustainability Appraisal, **therefore what is considered to be a reasonable alternative will change and will require update through subsequent versions of the Sustainability Appraisal**. Each of the previous strategic requirements established by the JSP is taken in turn and assessed to identify what realistic reasonable alternatives could exist. This draws on consultation responses, feedback on the approach to the JSP within the Inspector’s Report and the remaining evidence base. Where gaps in the appraisal process exist, recommendations have been suggested to take forward.

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<sup>47</sup> <https://www.westofengland-ca.gov.uk/west-of-england-strategic-planning/>

### 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 was becoming unattainable for many due to worsening housing affordability.
- The impact of increasing population densities was most acutely felt within the central areas of Bristol, which alongside a large and growing student population, potential exists to create further competition within the available housing stock.
- Bristol's figure (per thousand households) for those in temporary accommodation is the third highest in the core cities, and a figure which has increased since 2018, indicating the pressure on providing suitable move-on accommodation for homeless households.
- In late 2019, Bristol City Council reported 98 rough sleepers in the National Rough Sleeper Count, the fifth highest number nationally<sup>48</sup>.

National planning policy requires Council's to significantly boost the supply of homes<sup>49</sup>. 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 development<sup>50</sup>. These policies should be informed by a local housing need assessment, conducted using the standard method set out in national planning guidance<sup>51</sup>. At the time of preparation for the March 2019 Consultation Draft, the assessment of housing needs was originally informed by the Wider Bristol Area Strategic Housing Market Assessment (SHMA) 2018.

Paragraph 33 of the NPPF also requires that policies and Local Plans should be reviewed to assess whether they need updating at least once every five years, with reviews being completed no later than five years from the adoption date of the plan.

The Local Plan objectives therefore resolved to deliver at least 33,500 homes in Bristol by 2036 including affordable housing and homes to meet a range of needs, whilst aiming to exceed this target when new infrastructure can unlock additional potential. Development of new and affordable homes was established 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*

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<sup>48</sup> JSNA Health and Wellbeing Profile (2020 / 21)

<https://www.bristol.gov.uk/documents/20182/3849453/JSNA+2019+-+Homelessness+%28Updated+Nov+19%29.pdf/7419209e-500d-2fe9-6fee-e719ff72ed05>

<sup>49</sup> Paragraph 59, NPPF (2019)

<sup>50</sup> Paragraph 23, NPPF (2019)

<sup>51</sup> Paragraph 60, NPPF (2019)

No alternatives were presented within the March 2019 Consultation Draft plan. This was because reasonable alternatives for housing quantum were intrinsically linked to the content of the Joint Spatial Plan; 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. Reflecting the timeframe for the Joint Spatial Plan, the Plan Period for all of these options is a 20-year period from 2016-2036.

Until a stage where the evidence base for the strategic plan or draft policies at the strategic level are updated in full, reasonable alternatives identified should be considered interim. As it is not the purpose of the SA to generate reasonable alternatives retrospectively, these options should be read against the existing Bristol Local Plan housing evidence base.

### **Stage 2.1 Option 1: Achieve a housing target of 33,500 homes**

When the March 2019 Consultation Draft was prepared, the most up-to-date and current housing needs assessment for the area was the Wider Bristol Area Strategic Housing Market Assessment (SHMA) (2018). This was prepared by ORS for each of the four Unitary Authorities within the Bristol and Bath area, and forms the starting point for assessing housing growth options. The SHMA (2018) identified that the overall housing need for the wider Bristol area was for 86,959 dwellings per annum between 2016 and 2036. This was based on household projections and an uplift for suppressed household formation and market signals.

This housing target was based on the following elements of supply:

- Completions between 2016/17 (noting the base date of the plan was 2016) and extant planning permissions since 2016;
- Non-strategic growth in South West Bristol Green Belt<sup>52</sup>;
- Strategic Development Location at Bath Road;
- Existing Core Strategy and Site Allocations Development Management site allocations;
- Urban potential, previously termed as ‘Urban Living’ capacity and typical of a large site windfall likely to occur as a result of market forces; and
- Small site windfalls, of between 1-9 homes that are likely to occur as a result of market forces.

|                                     |  |
|-------------------------------------|--|
| Reasonable Alternative              | Yes  |
| Rationale                           | As of March 2019, this was the housing target set out in the Joint Spatial Plan, which was based on the most up-to-date version of the Housing Market Needs Assessment.              |
| Recommendations for Evidence Update | There is an impending update to the approach to assessing housing needs for the area. This will be addressed in the West of England Combined Authority Spatial Development Strategy. |

### **Stage 2.2 Option 2 Exceed the housing target of 33,500 using suitable land across the City (Draft Policy H1)**

To achieve the Mayor of Bristol’s commitment to building 2,000 new homes per year by 2020, of which 800 are affordable, the Local Plan Objectives therefore sought to ‘exceed’ the housing target.

<sup>52</sup> Over 10 homes and below 500 homes identified within the JSP as not forming a Strategic Development Location.

This second alternative (the ‘March 2019 Consultation Draft Policy H1 Option’) 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, areas of growth and regeneration and a variety of policy interventions, this figure 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 also relies on the following elements:

- Delivery of the draft Local Plan Review allocations within the March 2019 Consultation Draft, amounting to approximately 2,000 units;
- Optimising densities and using coordinated and comprehensive approaches to development within the Areas of Growth and Regeneration and other locations. The Urban Potential Assessment (2018) identified there may be potential for new homes in other locations that were not surveyed in detail;
- Making sure that residential sites are reserved for development of new and affordable homes and not unnecessarily used for other purposes; and
- Managing the development of student housing to safeguard existing communities and support delivery of new homes.

| Reasonable Alternative              | Yes   |
|-------------------------------------|---|
| Rationale                           | This reasonable alternative is based on the need to determine a minimum number of homes <sup>53</sup> . 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 no current evidence of site availability. A range of mechanisms can be deployed to facilitate delivery of new homes which exceeds targets. It is noted that, based on historic performance, existing local plan targets for housing delivery are likely to be exceeded. |
| Recommendations for Evidence Update | Evidence to demonstrate housing needs for the area.<br>Urban Potential Assessment and SHLAA evidence base with assessment of availability and deliverability of sites within the first five years.  |

### *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. This is because reasonable alternatives for housing quantum are intrinsically linked to the content of the Joint Spatial Plan, which has been withdrawn. The assessment of alternatives must therefore be updated once the future form of strategic plan-making within the West of England has been determined.
- The JSP housing target was based on guidance within the 2012 NPPF and the PPG as of March 2018. As the JSP production pre-dated the publication of the new NPPF in July 2018, a transitional arrangement meant that the JSP did not take account of the Standard Methodology

<sup>53</sup> Paragraph 11.

for Local Housing Need or the latest update released<sup>54</sup>. The Bristol Local Plan will need to be in conformity with the strategic level plan and any revisions to the calculation of housing need.

- ‘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. The uncertainty in the effects of these alternatives, particularly in the long-term, is therefore reflected as a common theme throughout the following assessments.

### *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 33,500 homes, 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. Effects are also likely to be similar for Objective 5 and 6, however again this is dependent on the proposed location for the increase in housing numbers.

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.

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 33,500 homes’ 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 is likely to be beneficial for inclusive growth, this is also likely to result in increased levels of development of vacant former PIWA sites or land in former employment uses. 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

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<sup>54</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

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. This effect is likely to be mitigated at a site level and by strategic infrastructure capacity improvements, which could include flood mitigation infrastructure. Finally, in terms of other infrastructure capacity, as the West of England authorities are reliant on working together to meet housing needs across the strategic plan area, consideration of required transport infrastructure will also be necessary to prevent unsustainable in-commuting.

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' by which uncapped levels of homes do not result in exponentially beneficial outcomes, particularly in relation to historic environment, green space and employment land. Further detail on infrastructure schemes and associated capacity will also be necessary to assess the specific effects of this Option at a site level. Conversely, whilst Option 1 would not result in significant beneficial effects, effects against other objectives within the Framework are generally more modest.

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 a housing target of 33,500 or Option 2 Exceed the housing target of 33,500 (Policy H1))**

| SEA Theme                           | SA Framework Objective  | D-M Criteria                              | Option 1 - Achieve a housing target of 33,500 homes |     |      |                            |                                |                             |   | Option 2 - Exceed the housing target of 33,500 using suitable land across the City (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<br>DMC2<br>DMC3<br>DMC4              | +/?   | +/? | +/?  | Both                       | P                              | City-wide and transboundary | R: Local Housing Market and Bristol's population.<br>AG: Bristol's population and households.<br>CR: Relevant strategic level planning policy explaining how housing need is met.<br>CR: Policies on housing mix and affordable homes.                                  | +/?  | +/?  | +/? | Both     | P                          | City-wide and transboundary    | R: Local Housing Market and Bristol's population.<br>AG: Bristol's population and households.<br>CR: Relevant strategic level planning policy explaining how housing need is met.<br>CR: Policies on housing mix and affordable homes. |  |  |
|                                     | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land                                       | DMC5<br>DMC6<br>DMC7                      | +/?   | +/? | +/?  | Both                       | P                              | Local and City-wide         | R: Various (urban and greenfield sites).<br>AG: Bristol's population and households.<br>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).<br>AG: Bristol's population and households.<br>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.<br>AG: As above, and Bristol businesses.<br>n/a   | +/?  | +/?  | +/? | Indirect | P                          | Local and City-wide            | R: Bristol's population and households.<br>AG: As above, and Bristol businesses.<br>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  |  |
| 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<br>DMC11                            | +/?   | +/? | +/?  | Direct                     | P                              | Local and City-wide         | R: Bristol's population and household within deprived areas.<br>AG: As above.<br>MB: Consider opportunities for local labour conditions.  | +/?  | +/?  | +/? | Direct   | P                          | Local and City-wide            | R: Bristol's population and household within deprived areas.<br>AG: As above.<br>MB: Consider opportunities for local labour conditions.   |  |  |
|                                     | 6. To reduce health inequalities and promote healthy lifestyles across the city   | DMC12<br>DMC13<br>DMC14                   | +/?   | +/? | +/?  | Indirect                   | P                              | Local and City-wide         | R: Bristol's population and household within poor health areas.<br>AG: As above.<br>CR: Ensure policies are cross-referenced which focus on overall quality of housing and wellbeing (specifically HW2).<br>CR: Evidence to improve air quality baseline for residents. | ?  | ?  | ?   | Indirect | P                          | Local and City-wide            | R: Bristol's population and household within poor health areas.<br>AG: As above.<br>CR: Evidence to improve air quality baseline for residents.  |  |  |
|                                     | 7. Ensure access to education and learning for all sections of society  | DMC15<br>DMC16                            | +/?   | +/? | +/?  | Indirect                   | P                              | Local and City-wide         | R: Bristol's population and households.<br>AG: As above, and Bristol businesses.<br>n/a   | +/?  | +/?  | +/? | Indirect | P                          | Local and City-wide            | R: Bristol's population and households.<br>AG: As above, and Bristol businesses.<br>n/a  |  |  |
| Economy and Employment              | 8. To support the economy and ensure that there are suitable opportunities for employment   | DMC17<br>DMC18<br>DMC19<br>DMC20<br>DMC21 | -/?   | -/? | -/?  | Direct                     | P                              | Local and City-wide         | R: Bristol's employees and employers.<br>AG: As above, and Bristol businesses.<br>CR: Policies relating to the provision of employment land / workspaces.   | -/?  | -/?  | -/? | Direct   | P                          | Local and City-wide            | R: Bristol's employees and employers.<br>AG: As above, and Bristol businesses.<br>MB: Provide examples of good mixed-use schemes (residential with B1 / B2 and B8 uses).   |  |  |
|                                     | 9. Ensure access to a range of shopping facilities for all sections of society  | DMC22<br>DMC23                            | +/?   | +/? | +/?  | Indirect                   | P                              | Local and City-wide         | R: Bristol's population and households.<br>AG: As above, and Bristol businesses.<br>n/a   | +/?  | +/?  | +/? | Indirect | P                          | Local and City-wide            | R: Bristol's population and households.<br>AG: As above, and Bristol businesses.<br>n/a  |  |  |
|                                     | 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.<br>AG: Bristol's population.<br>CR: Policies which ensure historic environment and townscapes are conserved and enhanced.   | -/?  | -/?  | -/? | Both     | P                          | Local and City-wide            | R: Cultural heritage; historic environment.<br>AG: Bristol's population.<br>CR: Policies which ensure historic environment and townscapes are conserved and enhanced.  |  |  |
| Townscape and Landscape             | 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats             | DMC25<br>DMC26                            | ?   | ?   | ?    | Both                       | P                              | Local and City-wide         | R: Local wildlife and biodiversity; natural environment.<br>AG: Bristol's population; wildlife.<br>CR: Policies which enhance biodiversity.<br>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.<br>AG: Bristol's population; wildlife.<br>CR: Policies which enhance biodiversity.<br>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.<br>CR: Policies which enhance biodiversity.<br>MB: Set out how Green Belt release can be offset through compensatory improvements.  | ?  | ?  | ?   | Both     | P                          | Local and City-wide            | As above.<br>CR: Policies which enhance biodiversity.<br>MB: Set out how Green Belt release can be offset through compensatory improvements.   |  |  |
| Transport and                       | 13. To encourage a demonstrable modal shift and reduce the need to travel   | DMC28<br>DMC29                            | ?   | ?   | ?    | Both                       | P                              | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.<br>AM: Transport infrastructure interventions.  | 0/?  | 0/?  | 0/? | Both     | P                          | City-wide and transboundary    | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.<br>AM: Transport infrastructure interventions.   |  |  |

|  |   |                                  |     |     |     |      |     |                         |   |   |  |     |     |      |     |                             |   |   |  |
|--|---|----------------------------------|-----|-----|-----|------|-----|-------------------------|---|---|--|-----|-----|------|-----|-----------------------------|---|---|--|
|  | 14. To maintain and improve the existing highway network  | DMC30<br>DMC31                   | ?   | ?   | ?   | Both | P   | City-wide transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses. | AM: Transport infrastructure interventions.   | 0/?  | 0/? | 0/? | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses. | AM: Transport infrastructure interventions.                         |  |
| Climate, Energy and Waste                                    | 15. To reduce the risk of flooding from all sources   | DMC32<br>DMC33                   | ?   | ?   | ?   | Both | P   | Local and City-wide     | R: Natural environment (water); AG: Bristol's population; local wildlife.         | AM: Setting out areas to benefit from flood defences.   | 0/?  | 0/? | 0/? | 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. |  |
|  | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled  | DMC34<br>DMC35<br>DMC36<br>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.<br>AG: Commuters and businesses. | AM: Transport infrastructure interventions.   | ?  | ?   | ?   | Both | P   | City-wide transboundary     | R: Bristol's population and natural environment.<br>AG: Commuters and businesses. | AM: Transport infrastructure interventions.                         |  |
|  | 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<br>DMC40<br>DMC41<br>DMC42 | ?   | ?   | ?   | Both | P   | City-wide transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses. | AM: Transport infrastructure interventions.<br>AM: Considering opportunities for carbon sequestration on greenfield and Green Belt sites. | ?  | ?   | ?   | Both | P   | City-wide transboundary     | R: Bristol's population and natural environment.<br>AG: Commuters and businesses. | AM: Transport infrastructure interventions.                         |  |
| <b>Reasonable Alternative Evaluation of Effects and Rank</b> | <p><b>Rank Score:</b> This strategic reasonable alternative sets out a requirement to <u>meet</u> the housing target of 33,500 homes; achieved by offering a large range of potential development sites, Growth and Regeneration Areas and a variety of policy interventions to increase the supply of housing. This alternative would be dependent on establishing a planning approach which seeks development of new and affordable homes as a primary objective in development locations; promoting urban living; ensuring the best use is made of existing development allocations and releasing some Green Belt land in both the south west and south east of the city.</p> <p><b>Scale of effects:</b> 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><b>Socio-economic and environmental effects:</b></p> <ul style="list-style-type: none"> <li>This option would likely create a minor positive effect in contributing towards a sufficient level of housing to meet needs within the City (SA Objective 1). However, as this option is reliant upon the JSP Authorities contributing collectively towards meeting Objectively Assessed Housing Needs within the housing market area, it is partly unknown whether this policy on its own will meet the identified needs of all communities within Bristol. This alternative does not prescribe the type of housing to meet identified need; however, it could be assumed that a variety of supply inputs, and a mandate to maximise efficiency on existing development allocations, would indirectly generate a range of different housing types. Increasing the provision of affordable housing could also be an indirect effect of this option, however this would be subject to the replacement for JSP policy for Affordable Housing provision.</li> <li>Housing supply is based in part on urban potential sites coming forward for delivery. Whilst this element of supply in isolation could generate a minor positive effect against SA Objective 2 by encouraging densification and intensification, achieving this housing target also requires non-strategic growth in the Green Belt within the south west of Bristol and release of land at Bath Road as a Strategic Development Location (SDL) and therefore, effects of this option may also be negative against this Objective. Demonstrating compliance with NPPF paragraph 137 at a Local Plan or Strategic Plan level would provide necessary safeguarding mitigation.</li> <li>Identifying additional development potential within the inner urban area, and areas well-served by public transport or close to local 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.</li> <li>This alternative has been informed by a city-wide assessment of urban potential, small site windfalls, existing completions and planning permissions and through maximising capacity on the existing site allocations. 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. Given the assessment of urban potential also includes reviewing land currently reserved for Principal Industrial and Warehousing Land, this may result in different types of investment within areas of concentrated disadvantage (for example, in mixed use developments rather than employment only uses). The overall effect of this policy against this Objective (DMC11) is therefore partly uncertain.</li> <li>Lack of good quality housing, homelessness or a degraded urban environment can contribute to many preventable diseases and overall poor health. Increasing the number of homes could indirectly improve health and reduce health inequalities (Objective 6). However, this will need to be supplemented with additional policies which focus on the overall quality of homes, better living conditions with private outdoor space and better maintained homes through energy efficiency and thermal comfort policies. In addition, a large proportion of site allocations are within AQMAs. Effects of this option are therefore in part unknown, and possibly negative, being influenced by non-strategic policies such as those under Design and Conservation, and Health and Well-being.</li> <li>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, urban potential sites have been identified on vacant former PIWA sites, and therefore whilst it is assumed that there would be no net loss of jobs, this alternative would result in a loss of employment space across Bristol to therefore create potential negative effects (DCM17, DCM18 and DCM19).</li> <li>Identifying additional development potential within the urban area, including some urban potential, small site windfalls and maximising the capacities on existing site allocations, may have relatively localised impact on the historic environment. In some instances, this could be beneficial if previous built form</li> </ul> |                                  |     |     |     |      |     |                         |   |   | <p><b>Rank Score:</b> This strategic reasonable alternative sets out a requirement to exceed the housing target of 33,500 homes, where there is sufficient service and infrastructure capacity. Alongside sources of supply set out within Option 1, this alternative would also be informed by the delivery of the draft Local Plan Review allocations within the March 2019 Consultation Draft, and by optimising densities within Growth and Regeneration Areas. This is consistent with Policy H1.</p> <p><b>Scale of effects:</b> 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><b>Social, economic and environmental effects:</b> 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. Differences in the scale of effect and particularly causes for such effects are set out below:</p> <ul style="list-style-type: none"> <li>As with Option 1, this option is reliant upon the JSP authorities contributing collectively towards meeting objectively assessed housing needs within the housing market area. Therefore, whilst exceeding the housing target would have a significant positive effect in contributing towards a level of housing to meet needs within the City (SA Objective 1), it remains unknown whether this policy taken in isolation could meet the identified needs of all communities within the City. As with Option 1, this option does not prescribe the type of housing to meet identified need; however, a mix of units and affordability is indirectly likely.</li> <li>For SA Objective 2 (DMC5 and DMC6), the assessment of effects is likely to be the same as Option 1; however, optimising densities and using coordinating and comprehensive approaches to development, particularly within the Growth and Regeneration areas, is likely to generate a greater degree of positive effect. As there is a continuing assumption that Green Belt release forms part of this option, there remains uncertainty with regard to the extent to which this option will maintain the openness of Green Belt (DMC7).</li> <li>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 33,500 homes 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 draft site allocations which are located beyond easy walking distance of key services, the effect is not considered to be significant positive overall.</li> <li>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. Again, this Option is similar to Option 1 in that it might result in different types of investment on land formerly designated as Principal Industrial and Warehousing Land. The overall effect of this policy against this Objective (DMC11) is partly uncertain.</li> <li>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 public health is directed by other factors including the design and location of development, to maximise benefits of this option, it would need to be supplemented with non-strategic policies that focus on the overall quality of homes. In addition, this policy may result in more homes being located within AQMAs, and therefore the effect is uncertain.</li> <li>Similar to Option 1, seeking to exceed the 33,500 homes could increase the positive effects associated with alleviating housing pressure on economic growth (SA Objective 8). However, conversely, this Option would likely result in an increased level of development of vacant former PIWA sites or land in former employment uses for the draft Site Allocations. Whilst requiring land to be used more efficiently is essential to addressing housing need, this alternative could result in 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.</li> <li>All sources of supply may have effects on the historic environment if these do not sympathetically respond to either the historic or landscape character or setting. Therefore, similar to Option 1, the effects of this policy option against Objective</li> </ul> |     |     |      |     |                             |   |   |  |

|   |   |  |
|---|---|--|
|   | <p>had degraded the historic environment, however, 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. Green Belt in the south west and east of the city was not considered to make a contribution to the historic character of a city, and therefore the effects are considered to be neutral in this regard.</p> <ul style="list-style-type: none"> <li>• 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'. However, development would be required to 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.</li> <li>• Intensifying and densifying development within the urban area and within locations close to public transport routes 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, as the JSP Authorities are reliant on working together to meet housing need this will also require consideration of transport interventions to prevent unsustainable levels of in-commuting by private vehicle. The overall effect of this Option against these Objectives is therefore likely to be uncertain, dependent in part upon the outcomes of the Duty to Cooperate on transboundary matters such as transport.</li> <li>• 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 Retained Policies (SA Objective 15); effects of this option are therefore unknown, depending on the siting and design of development brought forward.</li> </ul> | <p>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 33,500 homes' 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.</p> <ul style="list-style-type: none"> <li>• The assessment of effect of this Option against SA Objective 11 and 12 is likely to be comparable to Option 1. As this Option would result in the identification of draft Local Plan Review allocations and the optimisation of densities within the Areas of Growth and Regeneration, the resultant loss of green spaces which are no longer considered to be 'demonstrably special' nor an 'open space of public value' is broadly comparable to Option 1. It is uncertain the extent to which release of Green Belt land and some former Important Open Space could affect existing nature conservation assets and/or enable a net gain in biodiversity.</li> <li>• 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 this could encourage a shift towards active travel or greater use of public transport, as the JSP authorities are reliant on working together to meet housing need this will also require consideration of associated transport interventions to prevent unsustainable in-commuting. Exceeding the 33,500 homes target is reliant on being supported by service and infrastructure capacity, and therefore the overall effect could be neutral but uncertain. In addition, increasing the provision of homes within the city this could reduce levels of in-commuting. At a local level, there are several draft site allocations which are located beyond easy walking distance of key services which could result negative effects associated with increased use of private cars.</li> <li>• Maximising densities within the Growth and Regeneration Areas and identifying draft allocations across the city 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 33,500 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).</li> </ul> |
| <p><b>Suggestions and Recommendations</b></p> | <p><b>Rank: 1</b> There a large number of effects that are currently considered to be uncertain. Additional evidence is required to resolve areas of uncertainty, particularly in relation to the ability to conserve and enhance the historic environment and natural environment, the effects on jobs and employment spaces, transport and in relation to flood risk.</p> <p><b>Suggestions and Recommendations</b></p> <ul style="list-style-type: none"> <li>• Set out links to the relevant strategic-level planning policies which this draft Option would be conformity with, to explain how housing need and provision of affordable housing for Bristol will be met.</li> <li>• Demonstrate exceptional circumstances and a brownfield-first approach to the development of land within the Green Belt. Demonstrating compliance with NPPF paragraph 137 at a Local Plan or Strategic Plan level would provide necessary safeguarding mitigation.</li> <li>• Provide evidence to demonstrate that there will be no net loss of jobs through land identified through urban potential.</li> <li>• Provide evidence to demonstrate the effects on infrastructure provision (including Transport Modelling, the impacts of JLT4 and SFRA), nature conservation and historic environment.</li> </ul>  | <p><b>Rank: 1</b> Same as Option 1, there a large number of objectives within this Option that are currently considered to be uncertain which require additional evidence to be prepared.</p> <p><b>Suggestions and Recommendations:</b></p> <ul style="list-style-type: none"> <li>• Set out links to the relevant strategic-level planning policies which this draft Option would be conformity with, to explain how housing need and provision of affordable housing for Bristol will be met.</li> <li>• Demonstrate exceptional circumstances and a brownfield-first approach to the development of land within the Green Belt. Demonstrating compliance with NPPF paragraph 137 at a Local Plan or Strategic Plan level would provide necessary safeguarding mitigation.</li> <li>• Provide evidence to demonstrate that there will be no net loss of jobs within land identified as Urban Potential or draft allocations. Provide examples where land for B1 / B2 / B8 can be delivered as part of mixed-use residential schemes, without effecting the amenity of current or future residents.</li> <li>• Provide additional evidence to demonstrate how the historic environment and townscapes are to be conserved and enhanced through maximising growth within the Growth and Regeneration areas.</li> <li>• Provide detailed reference to the infrastructure schemes critically needed to exceed the 33,500 units.</li> </ul>  |

## 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.

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;
- Enabling growth of the economy for everyone, with modern workplaces and digital infrastructure fit for the future;
- Taking a plan-led approach to promoting areas with the potential to increase densities and make efficient use of underused land; and
- Allocating and promoting sites for housing and mixed-use development.

Key sustainability issues within the SA Scoping Report and March 2020 Baseline Update explained that there was a 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. The extent to which capacity within these locations can be maximised will be a factor for consideration.
- 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. 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 plan<sup>55</sup>.
- For an alternative option to be reasonable, there needs to be a realistic chance that it is based on a realistic, deliverable and developable supply of sites.
- 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 open<sup>56</sup>.

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

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<sup>55</sup> NPPF Paragraph 121

<sup>56</sup> NPPF Paragraph 133

1. **Completions:** Completions are derived from the residential land supply monitoring for trends in the period between 2006 and 2018<sup>57</sup>. Between 2007/08 and 2008/09 high numbers of annual completions were achieved in Bristol. This reflected the previously buoyant economy and housing market. Lower figures between 2010 and 2018 reflected housing market conditions<sup>58</sup>.
2. **Commitments:** Planning permissions, to include all sites with planning permission or agreed subject to s106 agreements at 31st March 2017. Evidence on the housing supply sites with planning permission or agreed subject to section 106 agreement at 31st March 2017 is set out in the Five Year Housing Land Supply report 2017-2022<sup>59</sup>.
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).
4. **Small sites:** Allowance is made for the supply of small sites (less than 1 hectare<sup>60</sup> or capable of delivering five or more dwellings<sup>61</sup>).
5. **Making efficient use of land through realising urban potential:** Set out as a Local Plan Objective, increasing the efficient use of urban land and building at optimal densities through the 'Urban Living' approach is one means of achieving delivery of greater housing numbers. 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. An assessment of 'urban potential' was published in 2018, which was based on evaluating the capacity of urban land throughout the city to accommodate dwellings.
6. **Green Belt release (Bath Road SDL and non-strategic allocations):** The Green Belt Assessment undertaken in November 2015<sup>62</sup> identifies the very limited level of Green Belt within the Bristol boundary. However, it notes:
  - In the south east of the City, Green Belt was considered to make a major contribution or contribution to four of the five purposes of the Green Belt, excluding the ability to preserve the setting and special character of historic towns.
  - In the south west of the City, the same overall assessment was recorded; however, in the Stage 2 assessment<sup>63</sup>, the land was considered to only make a limited contribution or contribution to four of the five purposes.

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 needs<sup>64</sup>. An SDL at Bath Road, Brislington was proposed within the publication draft of the JSP for a total of 750 units. In the south west of the City, three sites were identified for removal from the Green Belt which constitute 'non-strategic growth' on

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<sup>57</sup> Bristol Residential Development Survey (RDS) 2018

<sup>58</sup>

<https://www.bristol.gov.uk/documents/20182/34184/Bristol+Residential+Development+Survey+Report+2017/5eb5cd94-636b-7195-9a2e-2b57a05ed3ca>

<sup>59</sup> <https://www.bristol.gov.uk/documents/20182/34184/Five+Year+Housing+land+supply+report/544796c7-9d02-4243-a139-c14e72689680>

<sup>60</sup> NPPF Paragraph 68

<sup>61</sup> Paragraph: 009 Reference ID: 3-009-20190722

<sup>62</sup> JSP Green Belt Assessment Stage 1 (November 2015)

<sup>63</sup> JSP Green Belt Assessment Stage 2 (November 2016)

<sup>64</sup> Paragraph 4.5.22. 'Urban Extension in South East Bristol', Bristol Core Strategy (June 2011)

land inside the South Bristol Link road. These sites, which include land at Ashton Gate, land at Yew Tree Farm and land adjacent to Elsbert Drive, amount to around 850 homes.

**Consultation Responses to the March 2019 Draft:** Given the spatial strategy influenced a number of the draft policies, there were significant numbers of consultation responses<sup>65</sup> that discussed the suitability and appropriateness of alternative options in the round. Broad arguments were as follows:

- There was general support for emphasis on urban intensification and densification, through Urban Living principles, although groups were not clear on the extent to which this could be achieved within specific Growth and Regeneration areas (particularly where overarching infrastructure improvements were needed, such as a reconfiguration of highway infrastructure or a strategic flood defence infrastructure);
- Several groups were concerned about the visual impact of higher densities within the city on the townscape and the impacts on employment within the City Centre; and
- Specific groups considered that there should be no release of Green Belt land or loss of green spaces, whilst others promoting sites on green spaces within the city considered that this formed part of the land supply within the city.

### *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. 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.

#### *Stage 2.1 Option 1 Making best use of urban land and limited Green Belt release (the ‘March 2019 Consultation Draft’ option)*

Alongside known sources of supply, including commitments, completions, existing allocations and small sites allowance, this option consists of three main elements for the spatial distribution: intensification and densification 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 SDL and non-strategic allocations:

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

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<sup>65</sup> <https://www.bristol.gov.uk/documents/20182/34536/Bristol+Local+Plan+Review+consultation+March+2019+-+Summary+of+responses+Web.pdf/333c1eef-9387-5b1e-6890-f0577cc24468>

sites within the City Centre, and therefore an uplift in supply in these locations arises from potential conversion of office to residential uses<sup>66</sup>.

- Identification of draft Site Allocations (Draft Policy DA1) was based on sites that were suitable and larger than 10 units, outside the Growth and Regeneration areas. 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 Brislington and the south west Bristol sites, as set out within Draft Policies DS11 and DS12.

| Reasonable Alternative              | Yes  |
|-------------------------------------|--|
| Rationale                           | This is based on a balanced range of sources of supply, alongside Green Belt release and urban potential sites. Whilst all sites should be suitable, this alternative includes some sites where there is no current evidence of availability – despite ongoing trends of urban potential sites coming forward as planning applications, ongoing work should continue to identify availability. |
| Recommendations for Evidence Update | Urban Potential Assessment and SHLAA to be published. Green Belt Review to be published.   |

### *Stage 2.2 Option 2 Making best use of urban land only – no additional release of land within the Green Belt*

The Urban Potential Assessment (2018) noted that other development opportunities may exist, such as a larger development area than is currently allocated in the Cumberland Basin area. As such, this represents an additional source of potential supply, above and beyond the capacity identified within the study.

Given the two areas for Green Belt release amount to 1,600 units, this option seeks to test effects of higher levels of intensification and densification within the Growth and Regeneration Areas and retention of more Green Belt land. As the Bath Road SDL was established within the JSP, the Local Plan Review is required to retain this as a source of supply to ensure conformity with the strategic level of plan. The focus of this option therefore relates to the non-strategic land within the south west of the City.

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.

| Reasonable Alternative              | Yes   |
|-------------------------------------|---|
| Rationale                           | Whilst it is currently unclear whether levels of intervention will enable capacities to be maximised within the Plan Period (and therefore whether this additional capacity is developable) the principle of intensifying numbers of homes within the Growth and Regeneration Areas and releasing less Green Belt land should be considered a reasonable alternative. |
| Recommendations for Evidence Update | Urban Potential Assessment and SHLAA to be published. Green Belt Review to be published. Further assessment work to be undertaken of the timescales for infrastructure improvements in the Western Harbour.   |

<sup>66</sup> See 4.3 and Bristol Urban Potential Assessment (Feb 2018):  
<https://www.bristol.gov.uk/documents/20182/33167/Bristol+Urban+Potential+Assessment+2018>

### *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. To ensure conformity with the JSP and achieve the housing quantum established at this strategic planning level, capacity is required to be maximised through all sources of supply. Although withdrawn, aspects of supply (such as the Bath Road SDL) were mandated by the strategic-level planning context at March 2019; as such, no alternatives are considered to this element of the supply.
- To 'exceed' the housing quantum established at the strategic-plan level, the urban potential capacity particularly within the Growth and Regeneration Areas will need to be exceeded. The March 2019 Consultation Draft does not explicitly provide the outcomes of the urban potential assessment, and therefore the certainty of deliverability of these sources of supply remains 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.

When compared to Option 2, Option 1 (the 'March 2019 Consultation Draft' option) would have more positive effects when assessed against the Framework on the basis that it identifies more realistic sources of supply to contribute towards meeting the needs of communities within the housing market area. Both Options would depend on supply from urban potential and some supply from Green Belt land (in the form of Bath Road SDL for both), however there is less reliance on unknown sources of supply for Option 1. As it is unclear whether housing need will be met through this option alone, the effects are not significantly positive for Objective 1.

Both Options would have positive effects for SA Objective 3 (DM8), SA Objective 7 (DCM16) and SA Objective 9 (DCM22 and DCM23), as both could increase the number of homes within easy and affordable access to key services and community facilities. Both Options could also have direct positive effects on reducing health inequalities across the city too, by reducing a lack of good quality housing, homelessness and a poorly degraded urban environment.

Both Options are likely to increase the number of homes within close proximity to employment opportunities, which is likely to be beneficial for inclusive growth (Objective 8). Supply is based on making efficient use of land through urban potential, including mixed-use development within the Growth and Regeneration areas. Both options may therefore not result in a loss of jobs directly, however these are likely to reduce the level of available land for future employment land development. By removing the non-strategic Green Belt sites in the south west of the City, Option 2 could conversely reduce the level of investment within the south of the City (Objective 5).

Whilst Option 2 could reduce the scale of land removed from the Green Belt, as both Options do include an element of Green Belt release, these would have uncertain effects on the protection and enhancement of biological and geological assets, and the protection and enhancement of green and blue infrastructure. Both Options could also have effects on the historic environment if these do not

sympathetically respond to either the historic and/or landscape character or setting, however Option 2 may potentially more negative if additional development opportunities are found within the Cumberland Basin area.

In summary, there is no significant difference in the assessment effects between Option 1 (the 'March 2019' Consultation Option) and Option 2. However, given components of supply for Option 1 have comparatively more certainty in terms of deliverability than Option 2, this could have significant benefits for the supply of land for homes. Conversely, whilst Option 2 would not result in significant beneficial effects for Objective 1 and potentially more negative effects in relation to increasing the developable area at Cumberland Basin, it would reduce the extent of Green Belt land released.

**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 some Green Belt release in south west and south east of the City (the 'March 2019 Consultation Draft' option) |     |      |                            |                                |                          |  |   |  | Option 2 - Making best use of urban land only – no additional release of land within the Green Belt in the south east |      |                            |                                |                          |   |  |     |  |
|-------------------------------------|---|---|--|-----|------|----------------------------|--------------------------------|--------------------------|--|---|--|---|------|----------------------------|--------------------------------|--------------------------|---|--|-----|--|
|                                     |   |   | 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<br>DMC2<br>DMC3<br>DMC4              | +/?  | +/? | +/?  | Both                       | P                              | City-wide; transboundary | R: Local Housing Market and Bristol's population. AG: Bristol's population and households. | CR: Relevant strategic level planning policy which sets out how housing need is met.<br>CR: Policies on housing mix and affordable homes.   | +/?  | +/?   | +/?  | Both                       | P                              | City-wide; transboundary | R: Local Housing Market and Bristol's population AG: Bristol's population and households. | CR: Relevant Strategic level planning policy which sets out how Objective Assessed Housing need is met.<br>CR: Policies on housing mix and affordable homes.   |     |  |
|                                     | 2. Promote the conservation and wise use of land, maximising the reuse of previously developed land                               | DMC5<br>DMC6<br>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.         | AM: Demonstrate that use of suitable brownfield sites is maximised, including demonstrating that brownfield land in the Green Belt has been pursued first.   |     |  |
|                                     | 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  | n/a |  |
|                                     | 5. To reduce poverty and income inequality and improve the quality of life for those living in areas of concentrated disadvantage | DMC10<br>DMC11                            | +/?  | +/? | +/?  | D                          | P                              | Local and City-wide      | R: Bristol's population and household within deprived areas. AG: As above.                 | MB: Consider opportunities for local labour conditions.<br>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.                | MB: Consider opportunities for local labour conditions.<br>AM: Provide evidence of the consolidation of PIWA land.   |     |  |
| Health and Inequalities             | 6. To reduce health inequalities and promote healthy lifestyles across the city   | DMC12<br>DMC13<br>DMC14                   | +/?  | +/? | +/?  | I                          | P                              | Local and City-wide      | R: Bristol's population and household within poor health areas. AG: As above.              | CR: Ensure policies are cross-referenced which focus on overall quality of housing and mitigation of matters which could impact human health (such as poor air quality and locating development in areas of flood risk).  | +/?  | +/?   | +/?  | I                          | P                              | Local and City-wide      | R: Bristol's population and household within poor health areas. AG: As above.             | CR: Ensure policies are cross-referenced which focus on overall quality of housing and mitigation of matters which could impact human health (such as poor air quality and locating development in areas of flood risk).   |     |  |
|                                     | 7. Ensure access to education and learning for all sections of society  | DMC15<br>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<br>DMC18<br>DMC19<br>DMC20<br>DMC21 | -/?  | -/? | -/?  | D                          | P                              | Local and City-wide      | R: Bristol's employees and employers. AG: As above, and Bristol businesses.                | CR: Policies relating to the provision of employment land / workspaces<br>MB: Provide examples of good mixed-use schemes (residential with B1 / B2 and B8 uses) on different types of sites (small sites, urban potential, greenfield, former PIWA).<br>CR: To policies which ensure no net loss of jobs. | -/?  | -/?   | -/?  | D                          | P                              | Local and City-wide      | R: Bristol's employees and employers. AG: As above, and Bristol businesses.               | CR: Policies relating to the provision of employment land / workspaces<br>MB: Provide examples of good mixed-use schemes (residential with B1 / B2 and B8 uses) on different types of sites (small sites, urban potential, greenfield, former PIWA).<br>CR: Policies which ensure no net loss of jobs. |     |  |
|                                     | 9. Ensure access to a range of shopping facilities for all sections of society  | DMC22<br>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 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.<br>AG: Bristol's population.                        | CR: Policies which ensure historic environment and townscapes are conserved and enhanced.                                       | -/? | -/?  | -/? | Both | P   | Local and City-wide         | R: Cultural heritage; historic environment<br>AG: Bristol's population.                         | CR: Policies which ensure historic environment and townscapes are conserved and enhanced.                                       |  |
|  | 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats  | DMC25<br>DMC26   | ?   | ?   | ?   | Both | P   | Local and City-wide         | R: Local wildlife and biodiversity; natural environment.<br>AG: Bristol's population; wildlife. | CR: Policies which enhance biodiversity.<br>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.<br>AG: Bristol's population; wildlife. | CR: Policies which enhance biodiversity.<br>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.   | CR: Policies which enhance biodiversity.<br>MB: Set out how Green Belt release can be offset through compensatory improvements. | ?   | ?  | ?   | Both | P   | Local and City-wide         | As above.   | CR: Policies which enhance biodiversity.<br>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<br>DMC29   | ?   | ?   | ?   | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.               | CR: Policies which set out transport and mode shift interventions.  | ?   | ?  | ?   | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.               | CR: Policies which set out transport and mode shift interventions.  |  |
|  | 14. To maintain and improve the existing highway network   | DMC30<br>DMC31   | ?   | ?   | ?   | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.               | CR: Policies which set out transport and mode shift interventions.  | ?   | ?  | ?   | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.               | CR: Policies which set out transport and mode shift interventions.  |  |
| Climate, Energy and Waste                                    | 15. To reduce the risk of flooding from all sources  | DMC32<br>DMC33   | ?   | ?   | ?   | Both | P   | Local and City-wide         | R: Natural environment (water); AG: Bristol's population; local wildlife.                       | CR: Policies which set out flood risk interventions.  | ?   | ?  | ?   | Both | P   | Local and City-wide         | R: Natural environment (water); AG: Bristol's population; local wildlife.                       | CR: Policies which set out flood risk interventions.  |  |
|  | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled   | DMC34<br>DMC35<br>DMC36<br>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.<br>AG: Commuters and businesses.               | CR: Policies which set out transport and mode shift interventions.  | ?   | ?  | ?   | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.               | AM: Ensuring high quality residential properties which are do not expose future residents to harmful environments.              |  |
|  | 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<br>DMC40<br>DMC41<br>DMC42   | ?   | ?   | ?   | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.               | CR: Policies which set out transport and mode shift interventions.  | ?   | ?  | ?   | Both | P   | City-wide and transboundary | R: Bristol's population and natural environment.<br>AG: Commuters and businesses.               | AM: Transport infrastructure interventions.   |  |
| <b>Reasonable Alternative Evaluation of Effects and Rank</b> |  | <p><b>Rank Score: 1</b> - 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 two broad 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. Additional work is necessary to determine the effects on SA Objective 8 and the economy.</p> <p><b>Scale of effects:</b> 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><b>Social, economic and environmental effects:</b></p> |     |     |     |      |     |                             |   |   |     | <p><b>Rank Score: 2</b> - This strategic reasonable alternative is related to more concentrated development within the urban area.</p> <p>Whilst this Option would support provision of land for residential development across the city, it is not clear whether this would deliver sufficient land to meet housing need as sources of supply are uncertain. Although there would be one area of Green Belt release at Bath Road within this option (to ensure conformity with the JSP), this Option carries the benefits and challenges of concentrating more development within the City Centre area.</p> <p><b>Scale of effects:</b> 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. However, depending on sites identified as suitable to contribute towards the overall supply, effects may also be localised and site-specific.</p> <p><b>Social, economic and environmental effects:</b></p> <ul style="list-style-type: none"> <li>Option 2 is overall less likely to contribute to meeting housing needs, as this is somewhat based on other development opportunities which may or may not exist, such as a larger development area at Cumberland Basin. The overall effect is</li> </ul> |     |      |     |                             |   |   |  |

|   |   |   |
|---|---|---|
|   | <ul style="list-style-type: none"> <li>The Option is more likely to contribute towards meeting the identified needs of communities within the housing market area (Objective 1, DMC1), by identifying largely deliverable sites. 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. The effects of this Option are not significant positive overall, as it remains unclear the extent to which this Option could provide an adequate and diverse supply of housing to meet overall need across Bristol.</li> <li>Whilst this Option would see housing supply achieved by realising urban potential and through efficient use of land, a proportion of total supply (1,500 of 33,500 units) is achieved through Green Belt release at both Bath Road and in the south west of the city. The overall balanced of the 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 significant negative effect against DMC7.</li> <li>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.</li> <li>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 contingent on the suitability and availability of sites (SA Objective 5). Whilst urban potential sites were identified across the whole city, fewer underused sites are found in the north and therefore, urban potential supply results in clusters in parts of south and east Bristol. In addition, 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. However, as urban potential supply is also based on land formerly designated as Principal Industrial and Warehousing land, this Option might result in different types of investment. The overall effect of this policy against DMC11 is in part uncertain.</li> <li>Lack of good quality housing, homelessness or a degraded urban environment can contribute to many preventable diseases and overall poor health. For SA Objective 6, increasing the overall number 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).</li> <li>This Option could result in positive effects associated with alleviating housing pressure on economic growth (SA Objective 8). However, converse to SA Objective 1, this Option would likely result in an increased level of development of vacant former PIWA sites or land in former employment uses for the Site Allocations. Whilst this option may not result in the loss of any jobs, this alternative would result in a loss of employment space across the city (DCM17, DCM18 and DCM19) particularly in relation to the draft allocations and maximising urban potential.</li> <li>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, in the south east or south west of the city, was considered to be neutral overall. On balance, the overall effect may be negative, however this is uncertain and subject to implementation.</li> <li>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'. However, development would be required to deliver a net gain in biodiversity and to integrate green infrastructure (SA Objectives 11 and 12) where possible, which would introduce associated benefits; therefore, the overall effect could be neutral, however, the assessment of the effects of this policy would be site dependent.</li> <li>Whilst this could encourage a shift towards active travel or greater use of public transport, as the JSP authorities are reliant on working together to meet housing need this will also require consideration of transport interventions to prevent greater levels of in-commuting (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. The overall effect is therefore uncertain against these SA Objectives.</li> <li>Urban potential, small sites, committed sites and Green Belt release 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 in its current form would not proactively direct development towards lower flood risk areas (SA Objective 15), and therefore effects are uncertain overall.</li> </ul> | <p>therefore considered to be minor positive, but uncertain. Similar to Option 1, although this Option does not prescribe the type of housing, delivery methods or affordability, effects arise from the likelihood of this option to introduce supply from a range of different types of site.</p> <ul style="list-style-type: none"> <li>As this Option would concentrate development within the urban area and Growth and Regeneration areas in Bristol, this Option would likely maximise opportunities for re-use and regeneration of land and higher densities. Green Belt release at Bath Road remains part of this Option, and therefore a significant negative effect would still be realised when assessed against DMC7. The overall effect is therefore likely to be positive and not significant positive.</li> <li>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 location in close proximity to existing shops and services.</li> <li>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 contingent on the suitability and availability of sites (SA Objective 5). This Option would not seek to allocate sites in the Green Belt in the south west of Bristol, which could result in less investment within the south of Bristol. Development within the Cumberland Basin / Western Harbour area is also considered to be minor beneficial on the basis that this area is predominantly an area of moderate-low deprivation. Similar to Option 1, the effects of delivery of urban potential land against this Objective is uncertain on the basis that this will be dependent on the current use of the site and its location within the City.</li> <li>Lack of good quality housing, homelessness or a degraded urban environment can contribute to many preventable diseases and overall poor health. For SA Objective 6, increasing the overall number 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, with neighbourhood form often dictating healthy lifestyles and access to services, physical activity or ability to play. 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.</li> <li>This Option could result in similar effects to Option 1 for SA Objective 8, in that it would likely reduce the level of, albeit largely vacant or underused, employment land.</li> <li>Same as Option 1, delivering urban potential may result in a change to the historic townscape and urban landscape of the City Centre as a whole and be potentially negative or significantly negative if additional development opportunities are found within the Cumberland Basin area. 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. Release of Green Belt land in the South West of the City was considered to be neutral overall.</li> <li>This Option could result in similar effects to Option 1 for SA Objective 11 and 12, and is considered to produce unknown effects overall, based on the potential loss of green spaces alongside the development requirement for biodiversity net gain.</li> <li>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 and therefore reduce associated emissions (SA Objectives 13, 14, 17 and 18). Whilst this could encourage a shift towards active travel or greater use of public transport, as the JSP authorities are reliant on working together to meet housing need this will also require consideration of transport interventions to prevent greater levels of in-commuting. The overall effect is therefore likely to be uncertain.</li> <li>Identifying sites within the urban area may result in development coming forward within areas of flood risk, particularly if additional development opportunities are found within the Cumberland Basin. Whilst development would be expected to be supported by site-specific flood mitigation, this Option in its current form would not proactively direct development towards lower flood risk areas (SA Objective 15). Effects are unknown at this stage, but may be negative.</li> </ul> |
| <p><b>Suggestions and Recommendations</b></p> | <p><b>Suggestions and Recommendations:</b></p> <ul style="list-style-type: none"> <li>Set out links to the relevant strategic level planning policies which this draft Option would be conformity with, to explain how the housing need for Bristol is met.</li> <li>Demonstrate exceptional circumstances and a brownfield-first approach to the development of land within the Green Belt</li> <li>Provide evidence to demonstrate that there will be no net loss of jobs within land identified as Urban Potential or draft allocations. Provide examples where land for B1 / B2 / B8 can be delivered as part of mixed-use residential schemes, without effecting the amenity of current or future residents.</li> <li>Provide additional evidence to demonstrate how the historic environment and townscapes are to be conserved and enhanced through maximising growth within the Growth and Regeneration areas.</li> </ul>   | <p><b>Suggestions and Recommendations:</b></p> <ul style="list-style-type: none"> <li>Set out links to the relevant strategic level planning policies which this draft Option would be conformity with, to explain how the housing need for Bristol is met.</li> <li>Demonstrate exceptional circumstances and a brownfield-first approach to the development of land within the Green Belt.</li> <li>Provide evidence to demonstrate that there will be no net loss of jobs within land identified as Urban Potential or draft allocations. Provide examples where land for B1 / B2 / B8 can be delivered as part of mixed-use residential schemes, without effecting the amenity of current or future residents.</li> <li>Provide additional evidence to demonstrate how the historic environment and townscapes are to be conserved and enhanced through maximising development within the Growth and Regeneration areas (particularly within the Cumberland basin area where additional opportunities may be identified).</li> </ul>  |

### 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:

- Unemployment rates exist above the national average, however, 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<sup>67,68</sup>, and productivity was also high than other Core Cities. The employment rate has been broadly increasing for the last 12 years, from 72% in 2004/05 to 77% in 2016/17.
- Strong SME community in Bristol; with around 2,800 businesses created within the city each year on average and around 44% surviving into their fifth year<sup>69</sup>.
- Bristol continues to have deprivation ‘hotspots’ that are amongst some of the most deprived areas in the country.
- A slightly lower proportion of Bristol’s population live in the most deprived areas in England in 2019 than in 2015 - 15% of residents (70,400 people) live in the most deprived 10% of areas.
- 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 increasing hard to fill<sup>70</sup>.
- The Bristol EDNA (2016)<sup>71</sup> set out the implications of recent trends on supply: a loss of 174,131sq m of city centre office floorspace, predominantly in second-hand stock for conversion to residential accommodation; net losses within the City Centre and South and a net increase at Avonmouth.
- McKinsey & Co with the Centre for Cities found Bristol as having the only fast growing, globally-significant technology cluster in the UK (outside London)<sup>72</sup>.

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 Paragraph 20 requires strategic policies to make sufficient provision for employment and other commercial development. Paragraph 80 of the NPPF states that significant weight should be placed on the need to support economic growth and productivity, by taking into account both

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<sup>67</sup> 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.>

<sup>68</sup> Inclusive and Sustainable Economic Growth Strategy (September 2018):

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

<sup>69</sup> ONS data, within the Inclusive and Sustainable Economic Growth Strategy (2018)

<sup>70</sup> [https://www.businesswest.co.uk/sites/default/files/distribution\\_iss\\_2019\\_final\\_for\\_web.pdf](https://www.businesswest.co.uk/sites/default/files/distribution_iss_2019_final_for_web.pdf) and

[https://www.businesswest.co.uk/sites/default/files/distribution\\_iss\\_2019\\_final\\_for\\_web.pdf](https://www.businesswest.co.uk/sites/default/files/distribution_iss_2019_final_for_web.pdf)

<sup>71</sup> SD15B West of England Economic Development Needs Assessment (EDNA) (2015)

<sup>72</sup> McKinsey & Co with the Centre for Cities, explored further within Inclusive and Sustainable Economic Growth Strategy (September 2018)

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. Reference is made to the Government's Industrial Strategy<sup>73</sup> 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 120 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 121 states that Local Planning Authorities 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 sites or the viability and vitality of local centre.

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 conditions<sup>74</sup>. 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.

At the time of the Local Plan Review (March 2019 Consultation Draft) was produced, the policy direction for employment land in Bristol was set by the Joint Spatial Plan. This policy direction set by the Joint Spatial Plan followed the shift in national policy emphasis, stating amongst other things, that:

*'The clear priority for the development of brownfield land in the urban areas of the West of England will provide the opportunity for increased homes and employment using vacant or underused land. Key sites available for an increase in employment activity or for the release to housing land from employment use within Bristol City, the urban edge of Bristol within South*

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<sup>73</sup> HM Government (2017) Industrial Strategy: Building a Britain fit for the future.

<sup>74</sup> Paragraph: 025 Reference ID: 2a-025-20190220

*Gloucestershire, and within Weston–super-Mare and Bath will be identified through the new the Local Plans*<sup>75</sup>.

This direction was informed by the Economic Development Needs Assessment (EDNA) (2016)<sup>76</sup>.

In relation to job numbers, the JSP set out a job target of 82,500 jobs. This was calculated by the West of England Local Enterprise Partnership (LEP) using Oxford Economic Forecasts, and was originally based on a medium-high growth in number of jobs, with a 1.1% uplift<sup>77</sup>. Whilst the supporting evidence base notes uncertainty from changing macro-economic conditions surrounding Brexit and structural changes occurring across sectors as a result of digital advancements, the medium-high Oxford Economic forecasts were considered to be the most representative for the following reasons<sup>78</sup>:

- A greater emphasis on productivity-led growth. Given that the West of England is close to full employment, it is reasonable to expect a slowing of jobs growth going forward as a result of less slack in the labour market (i.e. the recovery from 2008/9 has been jobs rich, it is unlikely that this will continue at the same rate).
- This is also underpinned by technological changes (automation, AI and digital advancements) which will further raise productivity.
- Growth in high value, knowledge based sectors (e.g. professional and tech services), which are driven more by quality rather than quantity of employment.
- Downgrading of UK growth rate as a result of uncertainty around the outcomes of Brexit.

These changes in circumstances create complex implications for employment land. Indeed, no employment land or sector-based floorspace targets were defined at a unitary authority level within the Joint Spatial Plan as the EDNA (2016) concluded that there was sufficient employment land at the West of England strategic level to meet the demand forecast in both the medium-high and high Oxford Economic 2015 forecasts. Whilst the economic development needs of the FEMA can be met in available developable employment space<sup>79</sup>, the EDNA considered that there was a relative imbalance between employment land supply and economic development needs in some locations. In summary<sup>80</sup>:

- 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 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.

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<sup>75</sup> SD1A West of England Joint Spatial Plan Publication Document (November 2017)

<sup>76</sup> SD15B West of England Economic Development Needs Assessment (EDNA) (2015)

<sup>77</sup> Table 4 of West of England JSP Topic Paper 3: Employment (2017)

<sup>78</sup> West of England JSP Topic Paper 3: Employment (2017)

<sup>79</sup> 4.19 of West of England JSP Topic Paper 3: Employment (2017)

<sup>80</sup> 4.19 of West of England JSP Topic Paper 3: Employment (2017)

For Bristol, the EDNA (2016)<sup>81</sup> explains that over the 10 year period from 2006 / 7 – 2015 / 16, there was an overall net gain of employment space in Bristol of 63,052 sq.m. This figure is derived from the following data:

- A net loss of 50,085 sq.m of employment space in Bristol City Centre, which had predominantly been in industrial / warehousing land.
- In the 10-year period 2006/7-2015/16, 191,292sq m of new B1a office floorspace was completed in the city centre. In the same period, there was also a loss of 174,131sq m of city centre office floorspace, predominantly in second-hand stock for conversion to residential accommodation, particularly for students. This has resulted in a net gain of 17,161sq m of city centre office floorspace being completed in the period 2006 – 2016. As of 2017, there were commitments amounting to some 58,346sq m of net office space in Bristol city centre, with losses of -16,146sq m of industrial.
- Over the 10 year period from 2006/7-2015/16, South Bristol saw a net loss of employment land of 81,647sqm, primarily from the loss of 75,284sqm of industrial floorspace. However, there has been a net gain in new office floorspace, amounting to 9,620sqm and recent commitments suggest a slight gain of employment space in South Bristol with 6,480sq m office and 2,965sqm industry and warehousing.
- At Avonmouth, there has been a net increase of 237,524sqm of employment floorspace in Avonmouth (Use classes B1, B2 and B8). This has been primarily from new large format warehousing /distribution premises. Avonmouth along with neighbouring Severnside in South Gloucestershire was allocated as an Enterprise Area in the City Deal for Bristol (2012). Whilst there are a number of development sites in Avonmouth, most of the employment opportunities will come through the redevelopment and intensification of existing units.
- Within the rest of Bristol, employment land can be found dispersed throughout the City. Over the last 10 years there has been a net loss of 47,574sq m throughout the rest of Bristol. Again, this has primarily been as a result of a loss in industrial land.

An update to the Employment Evidence Base in November 2018<sup>82</sup> identified that the EDNA (2015) was robust in terms of the demand assessment, however there was insufficient emphasis applied to the need for replacement activity land.

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.

To ensure conformity with the JSP, the strategy within the March 2019 Consultation Draft reflected this approach. Whilst employment growth is also identified within the Strategic Development Locations elsewhere within the four authorities, it is worth noting that no employment uses were proposed on the Bath Road, Brislington SDL on the basis that this was close to existing areas of employment.

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<sup>81</sup> West of England JSP Topic Paper 3: Employment (2017)

<sup>82</sup> JSP Updated Employment Evidence (Hardisty Jones, November 2018)

Whilst it was acknowledged that there was relatively limited strategic employment growth opportunities identified within South Bristol, the work done to inform the JSP explained that infrastructure improvements to the wider Bristol urban area will provide greater access to employment opportunities elsewhere in the region. It is recognised that flexibility in supply will be needed to support changes to employment in future years.

The evidence base for employment options is becoming increasingly out-of-date, particularly with recent events related to the COVID-19 pandemic and outcomes of the UK-EU Trade and Cooperation Agreement. The West of England Local Industrial Strategy was also published following the March 2019 Consultation Draft plan. All options and policies related to the impact of jobs growth or change on employment land supply will therefore need to be updated in light of these changes.

### *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 unbalancing of the Plan away from the economic uses within the City particularly in light of levels of housing growth. Comments considered that the inclusion of 'mixed use' does not provide sufficient guarantee of the new employment provision, whilst others requested a sector specific approach to employment land allocations. On this basis, it was argued that a version of previous policy BCS8 should be retained, where it was specifically required that 60,000sqm of office space would be needed as well as the allocation of 10 hectares of industrial land in South Bristol.
- Concerns that the strategy for employment land in South Bristol was inadequate in the context of significant levels of housing planned. This concern specifically related to the lack of employment opportunities in South Bristol, including the limited capacity of existing industrial parks, such as Filwood Green Business Park, and the perceived loss of office through permitted development. Whilst there was some support for the identification of workspace within St Philips' Marsh, there were comments which objected to the perceived displacement of employment uses from here to Avonmouth. Avonmouth was not considered to be a sustainable location with currently few lower-cost transport options compared to the centre of the city.
- 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. There was considered to be insufficient evidence for the loss of principal industrial and warehousing uses which were considered to be largely occupied.
- Comment 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.

#### *Stage 2.1 Reasonable Alternatives Employment Land and Growth strategy*

In conformity with the employment land strategy set out within JSP, no reasonable alternatives or options were tested within the March 2019 Consultation Draft.

As 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, no reasonable alternatives have been identified for overall amounts of employment land. It should therefore be assumed throughout all options for distribution, that there is no net loss in the overall amount of employment land – subject to evidencing that release of employment land does not result in the overall loss of jobs.

|                                     |   |
|-------------------------------------|---|
| Reasonable Alternative              | Based on the evidence used to inform the March 2019 Consultation Draft, there is no current evidence of reasonable alternatives for the overall amount of employment land. This must be assessed within the next iteration of the draft SA.   |
| Rationale                           | 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. Within the EDNA, there is a relative undersupply of warehousing land and an oversupply of land for industrial uses.  |
| Recommendations for Evidence Update | <ul style="list-style-type: none"> <li>• The EDNA, job forecasts and employment land requirements will need to be updated in light of Brexit, the new Local Industrial Strategy and COVID-19.</li> <li>• There is currently no evidence to support suggested alternatives relating to the breakdown of the quantum of employment land within each sector. This will need to be an area for updated evidence going forward.</li> </ul> |

### *Stage 2.2 Reasonable Alternatives for Distribution of Employment Land*

Whilst the JSP considered reasonable alternatives to the location of employment land, these related to the distribution of employment uses on the proposed SDL sites. No reasonable alternative suggestions were made for locations within Bristol.

The following options are therefore tested for the purpose of the SA, with the reasons behind each option and their origins, are set out in the following text:

- Option 1: Approach which informs Draft Policies E2, E3, E4, E5, E7 and DA1 within the March 2019 Consultation Draft (including the development of workspace, reservation of Industrial and Distribution Areas for specific uses, and allocations for industry and distribution).
- 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: employment development at strategic locations, land reserved as industrial and distribution areas, creation of workspace upon redevelopment and allocation of greenfield sites for industry**

This option is consistent with the draft policy approach which informs E2, E3, E4, E5, E7 and DA1 within the March 2019 Consultation Draft. 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.
- 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.
- 35 Industry and Distribution Areas 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.
- 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; greenfield site at Western Drive, Hengrove (0.3ha); and brownfield land at Glenfrome Road, Eastville (0.92 ha).

|                                     |  |
|-------------------------------------|--|
| Reasonable Alternative              | Yes  |
| Rationale                           | This approach is based on the findings of the EDNA (2016), the assessment of land designated as PIWA and evidence base for the Industrial and Distribution allocations.                    |
| Recommendations for Evidence Update | This option will need to be refreshed and aligned to ensure consistency with any updates to evidence. The Industrial and Distribution allocations evidence base will need to be published. |

### 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 Strategic Development Location considered that, to prevent the displacement of employment to Avonmouth where there was 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.

As land uses proposed on the Bath Road SDL were determined by the Joint Spatial Plan, it is not considered to be a reasonable alternative to suggest employment uses on this site. However, as the South West Bristol sites are proposed through the Bristol Local Plan Review, 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              | This option would result in the allocation of land as set out within Option 1, however with additional land for industrial and distribution uses allocated within South West Bristol.  |
| 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. |
| Recommendations for Evidence Update | EDNA (2016) and Employment Land Review for Bristol will require update to understand the changes to demand and supply across the City.   |

### *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 has been challenging as the quantum of development was previously defined within the now-withdrawn JSP. Alternatives must be updated and reviewed once the Employment Land and Strategic Needs Assessment evidence base is updated.

In addition, the evidence base used to inform this assessment precedes recent macro-economic changes following the pandemic and the UK-EU Trade and Cooperation Agreement.

As there is no specific sectoral breakdown in jobs or employment land requirements by employment type, or quantum of development for development of workspace within the City Centre, Temple Quarter, Enterprise Area or Town / District / Local centres, it is not possible at this stage to accurately assess the effects of this approach on the individual decision-making criteria of Objective 8.

The Employment Land and Strategic Needs Assessment evidence base should be updated to reflect this changing context, and demand for employment land. Whereas, at a site-specific level, further evidence is needed to refine the assessment of effects: for example, in relation to transport modelling and implications for air quality, infrastructure including digital provision, impacts of site allocations on flood risks and ability to meet low carbon ambitions.

#### *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 1, which has then informed Draft Policy E2 of the Local Plan Review, would not result in any less land for housing than the current situation. Conversely, 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 proposed on previously developed land; the development of new workspace as part of mixed-use developments is proposed predominantly on brownfield land within Growth and Regeneration Areas; and there is one brownfield proposal at Glenfrome Road is on a former gas holder site. However, both options do also include proposed employment allocations on greenfield sites, including 60 hectares of employment land at Avonmouth and the 0.3ha proposed allocation at Western Drive. In the case of Option 2, this would result in even more development on Green Belt land.

In relation to Objective 5, around a quarter of IDAs and six Growth and Regeneration Areas overlap with areas that are within 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.

To accurately assess effects against Objective 13 and 14 will require further transport-related evidence base work. Locating more employment land on Green Belt sites to the south west of the City that are less well serviced by road, rail and port-transport when compared to Bristol Port may increase road-based transport movements associated with employment use. Conversely, however, whilst locating employment uses towards Avonmouth may improve air quality for residents of the inner city area, it is also likely to result in more workers travelling to locations outside the city centre and shift air quality impacts to people at Avonmouth Village and habitats along the River Severn. 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 12 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, creation of workspace upon redevelopment and allocation of greenfield sites for industry (Draft Policy E2) |     |      |                            |                                |                          |  | Option 2: Option 1 plus and allocation of additional greenfield 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<br>DMC2<br>DMC3<br>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<br>DMC6<br>DMC7                      | -/?  | -/? | -/?  | D                          | P                              | City-wide                | R and AG: Brownfield sites and greenfield sites, Bristol's local economy and local businesses. | AM: Consider methods of achieving carbon sequestration on greenfield sites.   | -/?  | -/? | -/?  | D                          | P                              | City-wide                | R and AG: Brownfield sites and greenfield sites, Bristol's local economy and local businesses. | AM: Consider methods of achieving carbon sequestration on greenfield sites.  |
|                                     | 3. Ensure easy and affordable access to key services  | DMC8                                      | n/a  | n/a | n/a  | n/a                        | n/a                            | n/a                      | n/a  | AM: Consider reference to non-employment land exceptions for ancillary uses that directly support the main function of the site (i.e. on-site hot food provision and creches).  | n/a  | n/a | n/a  | n/a                        | n/a                            | n/a                      | n/a  | AM: Consider reference to non-employment land exceptions for ancillary uses that directly support the main function of the site (i.e. on-site hot food provision and creches).   |
|                                     | 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<br>DMC11                            | +/?  | +/? | ?    | D                          | P                              | City-wide                | R: Built environment; AG: Bristol's population and employees.                                  | CR / MB: Consider local employment / local labour policy requirements, or requirements to partner with local skills establishments.<br>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                                   | CR / MB: Consider local employment / local labour policy requirements, or requirements to partner with local skills establishments.<br>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<br>DMC13<br>DMC14                   | ?  | ?   | ?    | Both                       | Both                           | Local and City-wide      | R and AG: Bristol's employees, adjacent population and general public health.                  | CR: Policies to mitigate the impact of concentrated employment uses in defined locations within the city.<br>CR: Policies which support walking and cycling to employment locations (including well-lit cycleways and bike storage on-site).<br>MB: Consider opportunities for landscaping to provide attractive open space and pleasant surrounding for employees.<br>AM: Consideration should be given to the compatibility of proposed employment uses with residential uses in mixed use developments, and appropriate mitigation should be provided. | ?  | ?   | ?    | Both                       | Both                           | Local and City-wide      | R and AG: Bristol's employees, adjacent population and general public health.                  | CR: Policies to mitigate the impact of concentrated employment uses in defined locations within the city.<br>CR: Policies which support walking and cycling to employment locations (including well-lit cycleways and bike storage on-site).<br>MB: Consider opportunities for landscaping to provide attractive open space and pleasant surrounding for employees.<br>AM: Consideration should be given to the compatibility of proposed employment uses with residential uses in mixed use developments, and appropriate mitigation should be provided.                            |
|                                     | 7. Ensure access to education and learning for all sections of society  | DMC15<br>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<br>DMC18<br>DMC19<br>DMC20<br>DMC21 | ?  | ?   | ?    | D                          | P                              | City-wide; transboundary | R and AG: Businesses employers and employees; economic growth and Bristol's population.        | AM: All forecast employment land requirements and jobs forecasts should be updated following the Covid-19 pandemic and UK-EU Trade and Cooperation Agreement.<br>AM: Consider providing sectoral breakdown for employment land and jobs forecast so the extent to which proposed sites meet employment need is clear.<br>AM: Consider referencing priority employment sectors from the Local Industrial Strategy (and future updates and sectoral breakdown in hectares. Consider making specific reference to  | ?  | ?   | ?    | D                          | P                              | City-wide; transboundary | R and AG: Businesses employers and employees; economic growth and Bristol's population.        | AM: All forecast employment land requirements and jobs forecasts should be updated following the Covid-19 pandemic and UK-EU Trade and Cooperation Agreement.<br>AM: Consider providing sectoral breakdown for employment land and jobs forecast so the extent to which proposed sites meet employment need is clear.<br>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.<br>CR: Policies to improve digital connectivity. |

|                           |  |                                  |     |     |     |      |      |                                 |   |   |     |     |     |      |      |                                 |   |  |  |
|---------------------------|--|----------------------------------|-----|-----|-----|------|------|---------------------------------|---|---|-----|-----|-----|------|------|---------------------------------|---|--|--|
|                           |  |                                  |     |     |     |      |      |                                 |   | low carbon sectors.<br><b>CR:</b> Policies to improve digital connectivity.   |     |     |     |      |      |                                 |   |  |  |
|                           | 9. Ensure access to a range of shopping facilities for all sections of society   | DMC22<br>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  |  |
| Townscape and Landscape   | 10. To ensure the protection and enhancement of the historic environment and its setting   | DMC24                            | ?   | ?   | ?   | I    | P    | Local and City-wide             | <b>R:</b> Cultural heritage; built environment; <b>AG:</b> Bristol's businesses, employers and historic environment.                                      | <b>CR:</b> Policies which support heritage conservation.<br><b>AM:</b> Require appropriate mitigation to minimise any impacts on the Scheduled Monuments or Grade I listed assets which allocations may impact (for example, the Land north of King Weston Lane and the Historic Gun Battery site in Avonmouth or in relation to Temple Meads Station).                       | ?   | ?   | ?   | I    | P    | Local and City-wide             | <b>R:</b> Cultural heritage; built environment; <b>AG:</b> Bristol's businesses, employers and historic environment.                                      | <b>CR:</b> Policies which support heritage conservation.<br><b>AM:</b> Require appropriate mitigation to minimise any impacts on the Scheduled Monuments which allocations may impact (for example, the Land north of King Weston Lane and the Historic Gun Battery site in Avonmouth or in relation to Temple Meads Station). |  |
|                           | 11. To ensure the protection and enhancement of biological and geological assets and improve the quality of wildlife habitats  | DMC25<br>DMC26                   | -/? | -/? | -/? | D    | P    | City-wide; transboundary        | <b>R:</b> Local wildlife and biodiversity including international statutory designations; natural environment. <b>AG:</b> Bristol's population; wildlife. | <b>CR:</b> Policies for nature conservation and biodiversity net gain.<br><b>AM:</b> 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                       | <b>R:</b> Local wildlife and biodiversity including international statutory designations; natural environment. <b>AG:</b> Bristol's population; wildlife. | <b>CR:</b> Policies for nature conservation and biodiversity net gain.<br><b>AM:</b> 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<br>DMC29                   | ?   | ?   | ?   | Both | Both | City-wide; transboundary        | <b>R:</b> Public health and economy; <b>AG:</b> Bristol's population.   | <b>AM:</b> Require appropriate walking and cycling provision to enable this to be made an attractive and routine method of transport, particularly those sites outside accepted walking distances.  | ?   | ?   | ?   | Both | Both | City-wide; transboundary        | <b>R:</b> Public health and economy; <b>AG:</b> Bristol's population.   | <b>AM:</b> Require appropriate walking and cycling provision to enable this to be made an attractive and routine method of transport, particularly those sites outside accepted walking distances.   |  |
|                           | 14. To maintain and improve the existing highway network   | DMC30<br>DMC31                   | ?   | ?   | ?   | Both | Both | City-wide; transboundary        | <b>R and AG:</b> Bristol's highway network; public health; Bristol's population.  | <b>AM:</b> Set out the impact of development proposals on highway network.  | ?   | ?   | ?   | Both | Both | City-wide; transboundary        | <b>R and AG:</b> Bristol's highway network; public health; Bristol's population.  | <b>AM:</b> Set out the impact of development proposals on highway network.   |  |
|                           | 15. To reduce the risk of flooding from all sources  | DMC32<br>DMC33                   | ?   | ?   | ?   | Both | Both | City-wide; transboundary        | <b>R:</b> Natural environment (water); <b>AG:</b> Bristol's population; businesses; essential infrastructure; local wildlife.                             | <b>AM:</b> Publish updated evidence in relation to the Strategic Flood Risk Assessment.<br><b>AM:</b> Consider removing areas of sites within Flood Risk Zone 3b, or require sequential layout to avoid any new development within these areas.   | ?   | ?   | ?   | Both | Both | City-wide; transboundary        | <b>R:</b> Natural environment (water); <b>AG:</b> Bristol's population; businesses; essential infrastructure; local wildlife.                             | <b>AM:</b> Publish updated evidence in relation to the Strategic Flood Risk Assessment.<br><b>AM:</b> Consider removing areas of sites within Flood Risk Zone 3b, or require sequential layout to avoid any new development within these areas.  |  |
|                           | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled   | DMC34<br>DMC35<br>DMC36<br>DMC37 | ?   | ?   | ?   | D    | Both | Local; City-wide; transboundary | <b>R:</b> Natural environment (water and land); <b>AG:</b> Bristol's population; local wildlife.  | <b>CR:</b> Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.  | ?   | ?   | ?   | D    | Both | Local; City-wide; transboundary | <b>R:</b> Natural environment (water and land); <b>AG:</b> Bristol's population; local wildlife.  | <b>CR:</b> Draft Local Plan policies in relation to climate change and sustainability, to include principles of sustainable resource use and waste management.   |  |
|                           | 17. Minimise air and noise pollution   | DMC38                            | ?   | ?   | ?   | I    | Both | Local; City-wide; transboundary | <b>R:</b> Localised air quality; biodiversity; public health; built environment; <b>AG:</b> population; local wildlife.                                   | <b>AM:</b> Provide evidence base to demonstrate the impact of locating more development at Avonmouth on Air Quality (including on habitats associated with the River Severn).<br><b>CR:</b> Air pollution mitigation proposed within draft policy HW2.<br><b>AM / CR:</b> Agent of change principles / noise mitigation in relation to where other uses are proposed on site. | ?   | ?   | ?   | I    | Both | Local; City-wide; transboundary | <b>R:</b> Localised air quality; biodiversity; public health; built environment; <b>AG:</b> population; local wildlife.                                   | <b>CR:</b> Air pollution mitigation proposed within draft policy HW2.<br><b>AM / CR:</b> Agent of change principles / noise mitigation in relation to where other uses are proposed on site.   |  |
| Climate, Energy and Waste | 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<br>DMC40<br>DMC41<br>DMC42 | ?   | ?   | ?   | Both | Both | Local; City-wide; transboundary | <b>R:</b> Natural environment; <b>AG:</b> Bristol's population; local wildlife.   | <b>MB:</b> Consider positively supporting low carbon and renewable sources for utilities (energy) infrastructure.   | ?   | ?   | ?   | Both | Both | Local; City-wide; transboundary | <b>R:</b> Natural environment; <b>AG:</b> Bristol's population; local wildlife.   | <b>MB:</b> Consider positively supporting low carbon and renewable sources for utilities (energy) infrastructure.  |  |

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| <p><b>Reasonable Alternative Evaluation of Effects and Rank</b></p> | <p><b>Rank Score 1:</b> 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 Growth and Regeneration Areas. The Option would also result in the reservation of 35 Industrial and Distribution Areas, and allocation of sites for employment at Avonmouth Industrial Area, Western Drive and Glenfrome Road.</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 Habitat Regulation Assessment will be needed to determine detailed effects and mitigation.</p> <p><b>Scale of effects:</b> 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><b>Social, economic and environmental effects:</b></p> <ul style="list-style-type: none"> <li>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).</li> <li>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 Growth and Regeneration Areas and there is one brownfield proposal at Glenfrome Road is on a former gas holder site; 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 and the 0.3ha proposed allocation at Western Drive. 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, there are no employment plot ratios proposed within this option and therefore the effect on higher densities within sustainable locations is uncertain.</li> <li>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 GRAs and Temple Quarter Enterprise Zone is likely to have easier access to services. In retained employment sites such as the IDAs and Enterprise Area, provision of services is likely to be more established. However, in new very large allocations (such as Avonmouth Industrial Area and Bristol Post), reference could be made to non-employment land exceptions for ancillary uses that directly support the main function of the site (i.e. on-site hot food provision or creches where there is insufficient local service provision).</li> <li>For Objective 5, the effects of this option are complex. Around a quarter of IDAs and six Growth and Regeneration Areas 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, 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, 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.</li> <li>For Objective 6, effects are again likely to be complex and uncertain. By concentrating B1, B2 and B8 uses in IDAs, employment allocations 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 (i.e. at Avonmouth Village), which would require appropriate mitigation. By introducing a mix of uses to Growth and Regeneration Areas, 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.</li> <li>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.</li> <li>The assessment of this Option against Objective 8 is unclear and potentially minor positive at this stage, as a result of the following: <ul style="list-style-type: none"> <li>In relation to DMC18 and DMC19, this option could result in the provision of a range of high-quality employment spaces and maintain strategic employment opportunities to meet employment need defined within the Joint Spatial Plan. It is assumed that this option would not result in any net loss of employment land; instead it is assumed that this option would result in employment development at strategic locations (such as Avonmouth Enterprise Area and TQEZ), land reserved for IDAs, creation of workspace and allocation of greenfield sites. This could have a positive, city-wide effect on these DMCs. However, as this option would result in the relocation of some employment land to strategic employment locations across the city, this could also have a negative impact on the current range of sites available.</li> <li>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. However, there is no sectoral breakdown to support employment need or proposed employment sites and therefore the extent to which the option aligns with this criterion is unclear at this stage.</li> <li>As set out against Objective 5, this option would generally have minor positive effects in the short and medium term for DMC19.</li> <li>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 Growth and Regeneration areas. There is no specific reference to low carbon sectors, and no reference within this option to improving digital connectivity.</li> </ul> </li> <li>The impacts of the key employment locations, IDAs and proposed site allocations 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.</li> <li>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 mean that a Habitat Regulation Assessment will be needed to determine detailed effects and mitigation.</li> <li>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 are could encourage access to sustainable modes of transport (i.e. walking, cycling and public transport) and GRAs 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.</li> <li>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.</li> <li>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</li> </ul> | <p><b>Rank Score 1:</b> This Option is based on Draft Policy E2 plus additional South West 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><b>Scale of effects:</b> 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"> <li>This Option would result in substitution of three sites in the Green Belt, currently proposed for allocation for around 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).</li> <li>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 GRAs, however the effect is uncertain for greenfield and Green Belt sites.</li> <li>For Objective 3, 6, 7, 9, 11, 15, 16 and 18, effects for Option 2 are considered to be broadly similar to Option 1.</li> <li>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.</li> <li>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.</li> <li>Effects against Objective 10 are similar to Option 1. Green Belt release in the south west 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).</li> <li>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 area 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.</li> </ul> |
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|   | <p>applied across a site or building level due to factors such as viability or site constraints. These objectives will be predominantly determined by implementation.</p>  |  |
| <p><b>Suggestions and Recommendations</b></p> | <p><b>Suggestions and Recommendations:</b></p> <ul style="list-style-type: none"> <li>• All forecast employment land requirements and jobs forecasts should be updated following the Covid-19 pandemic and the UK-EU Trade and Cooperation Agreement. Consider providing sectoral breakdown for employment land and jobs forecast so the extent to which proposed sites meet employment need is clear.</li> <li>• Consider local employment / local labour policy requirements, or requirements to partner with local skills establishments to ensure direct benefits to deprived areas.</li> <li>• Recognising the intensification of employment uses within the City and the concentration of uses at Avonmouth, continue to monitor the uptake of employment land to ensure there is sufficient supply to meet demand through the Plan Period. This will be particularly important given the uncertain effects of the pandemic and Trade Agreement on demand for UK-based employment uses.</li> <li>• Mitigate the effects of intensification of employment uses within specific locations across the city, for example, new development adjacent to IDAs and development at Avonmouth.</li> <li>• Consider opportunities for non-employment ancillary uses at very large allocations, to provide inclusive supporting services to employees (for example, on-site hot food uses, prayer facilities or creches).</li> <li>• Provide opportunities for active travel at employment locations, including bike storage, changing rooms and showers, whilst also providing infrastructure for safe travel (i.e. lit walkways and segregated cycle paths).</li> <li>• Consideration to be given to the compatibility of proposed employment uses with residential uses in mixed use developments, and appropriate mitigation should be provided.</li> <li>• Provide transport modelling or evidence to understand the effects of relocating employment uses from the city centre to Avonmouth, and to demonstrate the effects on air quality.</li> </ul> | <p><b>Suggestions and Recommendations:</b></p> <p>Same as Option 1, however, this option would also require exceptional circumstances to be demonstrated for Green Belt release for employment uses at south west Bristol sites.</p> |

## 5.2 Reasonable Alternatives for Draft Local Plan Review 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 draft policies for the Local Plan.

As explained within the introduction to the SA Framework, a significant number of policies within the currently adopted Local Plan are proposed to be retained within the Local Plan Review, and therefore these are not reappraised again. New policies within the Local Plan Review are assessed to understand whether reasonable alternatives exist and the effects of these policies to be evaluated against the SA Framework.

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

Using the themes within the Local Plan Review, policy options are detailed against the assessment of effects for each policy within **Appendix 3 Assessing the effects of the draft Local Plan Review 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 are realistic based on available evidence. Indeed, the SA should only focus on what is required to assess the likely significant effects of the Plan, appropriate for the content and level of detail in the Plan<sup>83</sup>.

**For each policy theme within the Local Plan Review, 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 alternatives from the March 2019 Consultation Draft.
- Whether national planning policy or strategic plan 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, and reflect changes back into options (i.e. withdrawal of the JSP and commencement on the SDS).
- Where the evidence base is evolving, which has also limited the choice of reasonable alternatives at this stage. Recommendations are made for updating the evidence base as appropriate.
- 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 draft Local Plan Review policies**. As additional alternatives emerge as the plan evolves, these should be reflected in future updates of the SA.

## 5.3 Reasonable Alternatives for Site Allocations

Potential development sites were identified from the following sources:

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<sup>83</sup> NPPG (2014) Paragraph: 009 Reference ID: 11-009-20140306.

- Existing allocations and sites within Neighbourhood Plans
- Call for Sites
- Urban potential assessment sites and otherwise vacant previously developed land
- Sites provided by (owned or potential acquisitions) the BCC Housing Delivery Team or other publicly owned
- Residential Development Survey sites
- Pre-application sites, planning applications and some recent residential refusals (where the principle of development not objected to)
- Sites formerly in other use or designation, identified through other evidence base documents

A multi-stage process was followed to identify which of these potential sites should be included as proposed site allocations. This included:

- An initial sift of 'show-stopper' constraints, including those wholly within Flood Zone 3b, HSE Zones and Inner COMAH Zones, or land designated as SSSI, RAMSAR, SAC or SPA, Local Nature Reserve or National Nature Reserve, was discounted from the process. Very small sites, which would otherwise come forward as windfall, have also not been taken forward to later stages of the assessment.
- A general assessment of suitability was then undertaken against criteria similar to that within the Interim SA. This included: assessment of access to the site, known land stability constraints or underground structures, presence of permanent features (such as pylons), topography, biological and geological importance, green infrastructure, historic environment, Green Belt, flood risk, location of a main river, and accessibility. Sites were only removed where it was considered that the remaining capacity of the site would be less than 10 units.
- The final stage of the assessment considered the availability of the site; where sites were generally removed only where there was a known unwilling landowner, or the existing use was very unlikely to change in the Plan Period. Sites that received planning permission during the process were also removed, and similarly, permitted development rights were extended during the process this effectively recategorised previous sites as 'windfall'. The policy context was also a consideration, where sites were removed if there was a serious conflict with the adopted Plan or emerging evidence base.

Given the overarching need to meet a minimum of 33,500 new homes by 2036, and the primacy of new and affordable homes as a core objective of the Local Plan, there is was an overarching focus on sites that may be suitable for housing. Some of the rejected sites which scored well against the sustainability criteria were not taken forward for reasons that were not picked up through the sustainability appraisal process directly.

## 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 Local Plan Review March 2019 Consultation draft policies. 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 Local Plan Review March 2019 Consultation Draft

Matrices within **Appendix 3 Assessing the effects of the draft Local Plan Review policies and Appendix 4 Predicting and evaluating the effects of Local Plan March 2019 Consultation Draft Sites** 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. This assessment was undertaken in August / September 2020.

Using the SA Framework as a guide, the assessment of the Local Plan Policies and associated recommendations in **Table 13** covers:

- Any significant adverse or beneficial effects of the draft policy option in relation to the SA Framework or Local Plan Objectives.
- Suggested amendments to address: where adverse effects of the draft policy option 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.

Draft site allocations were appraised against the framework set out within **Appendix 2 Framework to inform the prediction and evaluation of the effects of Local Plan Review March 2019 Consultation Draft Site Allocations and Growth and Regeneration Areas**. This specifically applies to:

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

- Site Allocations (Draft Policy DA1) (**Appendix 4**) (summarised within **Table 15**);
- Industrial and Distribution Areas (Draft Policy E4) (**Appendix 4**) (summarised within **Table 16**);  
and,
- Avonmouth Industrial Area and Bristol Port (Draft Policy E5) (**Appendix 4**) (summarised within **Table 17**).

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

### 6.3 Predicting the effects of the Local Plan Review March 2019 Consultation Draft

Table 13 Assessment of March 2019 Consultation Draft Local Plan Policies against the SA Framework (see Section 3.4 of this Main Report)

| Draft Local Plan Policy   | SA Objective |      |     |     |     |      |     |      |     |      |      |     |      |     |     |      |      |      |
|---|--------------|------|-----|-----|-----|------|-----|------|-----|------|------|-----|------|-----|-----|------|------|------|
|   | 1            | 2    | 3   | 4   | 5   | 6    | 7   | 8    | 9   | 10   | 11   | 12  | 13   | 14  | 15  | 16   | 17   | 18   |
| Draft Policy IDC1: Development contributions and CIL                                      | ?            |      | +/? | +/? | +/? | +/?  | +/? | +/?  | +/? | ?    | ?    | +/? | +/?  | +/? | +/? | ?    | ?    | ?    |
| Draft Policy UL1: Effective and efficient use of land                                     | +/?          | ++/? | +/? |     | +/? | ?    | ?   | +/?  | +/? | ?    | ?    | ?   | +/?  | ?   | ?   | ?    | ?    | ?    |
| Draft Policy UL2: Residential densities   | +/?          | ++/? | ?   |     | +/? | ?    | ?   | ?    | ?   | ?    | ?    | ?   | +/?  | ?   | ?   | ?    | ?    | ?    |
| Draft Policy H1: Delivery of new homes (see Section 5.1.1 and 5.1.2)                      | ++/?         | +/?  | +/? |     | +/? | ?    | +/? | -/?  | +/? | -/?  | ?    | ?   | 0/?  | 0/? | 0/? | ?    | ?    | ?    |
| Draft Policy H2: Preventing the loss of residential accommodation                         | +            | +/?  |     | 0/? | 0/? | +/?  | 0/? |      |     |      |      |     | 0/?  | 0/? | 0/? | 0/?  |      |      |
| Draft Policy H3: Making the best use of site allocations                                  | +/?          | +/?  | +/? | ?   | +/? | +/?  | ?   | ?    | +/? | ?    | ?    | ?   | ?    | ?   | ?   |      | ?    |      |
| Draft Policy H4: Housing type and mix   | ++/?         | +/?  | +/? |     | +/? | +/?  | +/? | +/?  | +/? | 0/?  |      |     | ?    | ?   |     |      |      |      |
| Draft Policy H5: Self-build and community-led housing                                     | +/?          | -/?  | ?   | 0/? | ?   | ?    | ?   | -/?  | ?   | ?    | -/?  | -/? | ?    | ?   | ?   |      |      |      |
| Draft Policy H6: Homes in multiple occupation and other shared housing                    | +/?          | ?    |     |     |     |      |     |      |     | +/?  | ?    | ?   |      | +/? | ?   | ?    | ?    | ?    |
| Draft Policy H7: Managing the development of purpose-built student accommodation          | +/?          | +/?  | ?   |     |     | ?    | ?   |      | ?   | ?    | ?    | ?   | +/?  |     | ?   | ?    | ?    | ?    |
| Draft Policy H8: Older peoples' and other specialist needs housing                        | +/?          | ?    | +/? |     |     | +/?  |     |      | +/? | ?    | ?    | ?   | +/?  |     | ?   | ?    | ?    | ?    |
| Draft Policy H9: Accessible homes   | +/?          |      |     |     |     | ?    |     |      |     |      |      |     |      |     |     |      |      |      |
| Draft Policy H10: Planning for traveller sites  | +/?          | ?    | +/? |     |     |      |     |      |     | ?    | ?    | ?   |      |     | ?   | ?    | ?    | ?    |
| Draft Policy E1: Inclusive economic development   | ?            | ?    |     |     | +/? |      | +/? | +/?  |     |      |      |     | ?    |     |     |      |      | ?    |
| Draft Policy E2: Employment land strategy (see Section 5.1.3)                             |              | -/?  |     |     | +/? | ?    |     | ?    |     | ?    | -/?  | -/? | ?    | ?   | ?   | ?    | ?    | ?    |
| Draft Policy E3: Location of office development   |              | +/?  | +/? |     | +/? | ?    |     | +/?  | +/? | ?    | ?    | ?   | ?    | ?   | ?   | ?    | ?    | ?    |
| Draft Policy E4: Industry and Distribution Areas  |              | ++/? | +/? | +/? | +/? | ?    | +/? | +/?  | +/? | ?    | ?    | ?   | +/?  | ?   | -/? | ?    | -/?  | ?    |
| Draft Policy E5: Avonmouth Industrial Area and Bristol Port                               |              | -/?  |     |     | +/? | ?    |     | ++/? |     | -/?  | --/? | ?   | ?    | ?   | -/? | ?    | 0/?  | +/?  |
| Draft Policy E6: Protecting living conditions in Avonmouth village                        |              |      |     |     | +/? | +/?  |     | 0/?  |     |      |      |     | +/?  |     |     |      | +/?  |      |
| Draft Policy E7: New workspace within mixed-use development                               | 0/?          | ++/? | ?   | ?   | ?   | ?    |     | +/?  |     | ?    | ?    | ?   | ?    | 0/? | ?   | ?    | ?    | ?    |
| Draft Policy E8: Digital connectivity and inclusion                                       | 0/?          | 0/?  | +/? | +/? | +/? |      |     | +/?  |     | ?    | ?    | ?   |      |     |     |      |      |      |
| Draft Policy GI1: Local Green Space   | -/?          | +    |     | +   |     | +    |     | -/?  |     | +    | +    | +   |      |     | +/? | +/?  | +/?  | +/?  |
| Draft Policy GI2: Reserved Open Space   | ?            | +/?  |     | +/? |     | +    |     | ?    |     | +/?  | +/?  | +/? |      |     | +/? | +/?  | +/?  | +/?  |
| Draft Policy GI3: Incidental Open Spaces  |              |      |     |     |     | +/?  |     |      |     | +/?  | +/?  | +/? |      |     | +/? |      | +/?  | +/?  |
| Draft Policy GI4: Stapleton Allotments and Holdings – Food Growing Local Green Space      |              |      |     |     |     |      |     |      |     |      |      |     |      |     |     |      |      |      |
| Draft Policy T1: Development and transport principles                                     | 0/?          | +/?  | +/? |     | +/? | ++/? | +/? | +/?  | +/? | ?    | ?    | ?   | ++/? | +/? |     | ?    | ?    | ?    |
| Draft Policy T2: Transport schemes  |              |      |     |     |     |      |     |      |     |      |      |     |      |     |     |      |      |      |
| Draft Policy T3: Car and cycle parking provision for residential development              | ?            | +/?  |     |     | ?   | ?    |     |      |     |      |      |     | ?    | ?   |     | ?    | -/?  | ?    |
| Draft Policy T4: Cycle parking provision for B1 office development                        |              |      |     |     | 0/? | +/?  |     | 0/?  |     |      |      |     | ++/? | +/? |     | +/?  | +/?  | +/?  |
| Draft Policy T5: Provision of infrastructure for electric and other low emission vehicles | -/?          |      |     |     | ?   | ?    |     | -/?  | 0/? |      |      |     | ?    | +/? |     | +/?  | +/?  | ?    |
| Draft Policy CCS1: Climate change, sustainable design and construction                    | +/?          | 0/?  |     |     | +/? | +/?  |     | +/?  |     | ?    | +/?  | +/? | +/?  |     | ?   | ++/? | +/?  | ++/? |
| Draft Policy CCS2: Towards zero carbon development  | -/?          | 0/?  |     | -/? | -/? | 0/?  | -/? | +/?  |     | ?    | +/?  | +/? |      |     |     | ++/? | +/?  | ++/? |
| Draft Policy CCS3: Adaptation to a changing climate                                       | 0/?          | 0/?  |     |     | +/? | +/?  |     | 0/?  |     | ?    | +/?  | +/? |      |     | +/? | +/?  | ++/? | ++/? |
| Draft Policy CCS4: Resource efficient and low impact construction                         | ?            | 0/?  |     |     | 0/? | 0/?  |     | +/?  |     | ?    | +/?  | +/? |      |     |     | ++/? | +/?  | +/?  |
| Draft Policy CCS5: Renewable energy development   | ?            | 0/?  |     |     | ?   | 0    |     | ?    |     | ?    | ?    | ?   | ?    |     | ?   | +/?  | +/?  | ++/? |
| Draft Policy DC1: Liveability in residential development including space standards        | +/?          | +/?  |     |     | +/? | +/?  |     |      |     | ?    | ?    | +/? |      |     | ?   | ?    | ?    | ?    |
| Draft Policy DC2: Tall buildings  | +/?          | +/?  | +/? |     | +/? | ?    | ?   | +/?  | +/? | ?    | ?    | ?   | +/?  | ?   | ?   | ?    | ?    | ?    |
| Draft Policy DC3: Local Character and Distinctiveness                                     | 0/?          | 0/?  |     |     | +/? | +/?  |     |      |     | ++/? | ?    | +/? | +/?  | +/? | ?   | ?    | ?    | ?    |
| Draft Policy HW1: Pollution Control and Water Quality                                     | 0/?          | 0/?  |     | +/? | +/? | +/?  |     | +/?  |     |      | +    | +   | ?    | ?   | 0/? | +    | +/?  | +/?  |
| Draft Policy HW2: Air Quality   | 0/?          | 0/?  | +/? |     | +/? | +/?  | +/? | +/?  | +/? | ?    | ?    | ?   | +/?  | +   |     | +/?  | +    | +/?  |
| Draft Policy HW3: Takeaways   |              |      |     |     |     | +/?  |     |      | +/? | ?    | ?    | ?   | -/?  |     |     | -/?  | -/?  | ?    |

Table 14 Assessment of March 2019 Draft Local Plan Growth and Regeneration Areas against Appendix 2 Framework

| Growth and Regeneration Area                                  | SA Objective |      |      |      |      |     |      |     |      |      |      |     |      |     |     |    |     |     |
|---|--------------|------|------|------|------|-----|------|-----|------|------|------|-----|------|-----|-----|----|-----|-----|
|   | 1            | 2    | 3    | 4    | 5    | 6   | 7    | 8   | 9    | 10   | 11   | 12  | 13   | 14  | 15  | 16 | 17  | 18  |
| Draft Policy DS1 Bristol City Centre                          | ++/?         | ++/? | ++/? | +/?  | ++/? | -/? | ++/? | +/? | ++/? | -/?  | -/?  | +/? | +/?  | +/? | -/? | ?  | -/? | +/? |
| Draft Policy DS2 Bristol Temple Quarter                       | ++/?         | ++/? | ++/? | +/?  | ++/? | -/? | ++/? | +/? | +/?  | --/? | -/?  | +/? | ++/? | +/? | -/? | ?  | -/? | +/? |
| Draft Policy DS3 St. Philip's Marsh                           | ++/?         | ++/? | +/?  | ?    | ++/? | -/? | +/?  | +/? | +/?  | 0/?  | -/?  | +/? | +/?  | +/? | -/? | ?  | -/? | +/? |
| Draft Policy DS4 Western Harbour                              | ++/?         | +/?  | +/?  | +/?  | +/?  | -/? | +/?  | +/? | +/?  | --/? | --/? | +/? | +/?  | +/? | -/? | ?  | -/? | +/? |
| Draft Policy DS5 Frome Gateway                                | ++/?         | +/?  | +/?  | +/?  | ++/? | -/? | +/?  | +/? | +/?  | 0    | ?    | +/? | +/?  | +/? | -/? | ?  | -/? | +/? |
| Draft Policy DS6: Lawrence Hill                               | ++/?         | +/?  | +/?  | +/?  | ++/? | -/? | +/?  | +/? | +/?  | 0    | -/?  | +/? | +/?  | +/? | ?   | ?  | -/? | +/? |
| Draft Policy DS7 Central Fishponds                            | ++/?         | ++/? | ++/? | +/?  | +/?  | -/? | +/?  | +/? | +/?  | ?    | -/?  | +/? | +/?  | +/? | 0/? | ?  | -/? | ?   |
| Draft Policy DS8 Central Bedminster                           | ++/?         | ++/? | ++/? | +/?  | ++/? | -/? | +/?  | +/? | +/?  | -/?  | -/?  | +/? | +/?  | +/? | -/? | ?  | -/? | +/? |
| Draft Policy DS9 Brislington                                  | ++/?         | ++/? | +/?  | ?    | ++/? | -/? | +/?  | +/? | +/?  | ?    | -/?  | +/? | +/?  | +/? | ?   | ?  | -/? | ?   |
| Draft Policy DS10 Changes to the Green Belt in South Bristol  |              |      |      |      |      |     |      |     |      |      |      |     |      |     |     |    |     |     |
| Draft Policy DS11 Development allocations – southwest Bristol | ++/?         | --/? | ?    | ?    | +/?  | ?   | +/?  | ?   | ?    | ?    | ?    | ?   | ?    | ?   | ?   | ?  | ?   | +/? |
| Draft Policy DS12 New neighbourhood – Bath Road, Brislington  | ++/?         | --/? | +/?  | ?    | ++/? | ?   | +/?  | ?   | +/?  | ?    | ?    | ?   | ?    | ?   | ?   | ?  | ?   | ?   |
| Draft Policy DS13 Lockleaze                                   | ++/?         | ?    | +/?  | ?    | ++/? | +/? | +/?  | +/? | +/?  | ?    | -/?  | +/? | +/?  | +/? | ?   | ?  | +/? | ?   |
| Draft Policy DS14 Central Southmead                           | ++/?         | ?    | +/?  | ++/? | ++/? | ?   | +/?  | -/? | +/?  | 0    | -/?  | ?   | +/?  | +/? | 0/? | ?  | +/? | ?   |



| Site Ref | Site Name   | SA Objective |      |      |      |      |      |      |      |      |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |       |
|----------|---|--------------|------|------|------|------|------|------|------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
|          |   | 1            |      |      |      | 2    |      |      | 3    | 4    | 5     |       | 6     |       | 7     |       | 8     |       |       |       | 9     |       | 10    | 11    |       | 12    | 13    | 14    |       | 15    |       | 16    |       | 17    | 18    |       |       |       |       |       |       |       |       |
|          |   | DMC1         | DMC2 | DMC3 | DMC4 | DMC5 | DMC6 | DMC7 | DMC8 | DMC9 | DMC10 | DMC11 | DMC12 | DMC13 | DMC14 | DMC15 | DMC16 | DMC17 | DMC18 | DMC19 | DMC20 | DMC21 | DMC22 | DMC23 | DMC24 | DMC25 | DMC26 | DMC27 | DMC28 | DMC29 | DMC30 | DMC31 | DMC32 | DMC33 | DMC34 | DMC35 | DMC36 | DMC37 | DMC38 | DMC39 | DMC40 | DMC41 | DMC42 |
| BDA1702  | 14 Wyck Beck Road, Brentry  | +            | +    | 0    | 0    | +    | +    | 0    | ++   | ?    | ++    | ++    | 0     | ++    | +     | +/?   | +     |       |       |       |       |       | 0     | 0     | 0     | ?     | ?     | +     | +     |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| BDA1801  | Hengrove Leisure Park, Hengrove   | +            | +    | 0    | 0    | -    | +    | 0    | +    | ?    | 0     | 0     | 0     | ++    | +     | +/?   | +     |       |       |       |       |       | +     | +     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | +     | ?     |       |
| BDA1802  | Western Drive - Hengrove  |              |      |      |      | -    |      |      |      | ?    | 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     | ?     |
| BDA2201  | Broadwalk Shopping Centre, Broad Walk, Knowle                                 | +            | +    | 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     | ?     |       |
| BDA2302  | Former Barton Hill Nursery School, Queen Ann Road, St Philips                 | +            | +    | 0    | 0    | +    | +    | 0    | ++   | ?    | +     | +     | -     | ++    | ++    | +/?   | +     |       |       |       |       |       | 0     | 0     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | -     | ?     | ?     | 0     | ?     |       |
| BDA2402  | Land to the east of Romney Avenue and Stanfield Close (Romney PRC), Lockleaze | +            | +    | 0    | 0    | +    | +    | 0    | +    | ?    | +     | +     | 0     | ++    | ++    | +/?   | +     |       |       |       |       |       | 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     | 0     | ?     | ?     | 0     | ?     |       |
| BDA2601  | Land at Two Mile Hill Road / Charlton Road, St George                         | +            | +    | 0    | 0    | ++   | +    | 0    | ++   | ?    | 0     | 0     | 0     | ++    | ++    | +/?   | +     |       |       |       |       |       | +     | +     | +/?   | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| BDA2602  | 81-83 Two Mile Hill Road, St George   | +            | +    | 0    | 0    | +    | +    | 0    | ++   | ?    | 0     | 0     | 0     | ++    | +     | +/?   | +     |       |       |       |       |       | 0     | 0     | 0     | ?     | ?     | ?     | +     |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| BDA2603  | Land at Two Mile Hill Road / Waters Road, St George                           | +            | +    | 0    | 0    | +    | +    | 0    | -    | ?    | +     | +     | 0     | ++    | ++    | +/?   | +     |       |       |       |       |       | -     | -     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| BDA2604  | Land at to the south east of Cousins Lane, St George                          | +            | +    | ++   | ++   | +    | +    | 0    | -    | ?    | +     | +     | 0     | ++    | +     | +/?   | +     |       |       |       |       |       | -     | -     | 0     | -/?   | ?     | +     | +     |       | -/?   | ?     | ++    | ?     | 0     | 0     | +     | 0     | ?     | ?     | 0     | ?     |       |
| BDA2605  | Land at Broad Road / Lodge Road, St George                                    | +            | +    | 0    | 0    | +    | +    | 0    | ++   | ?    | +     | +     | 0     | ++    | ++    | +/?   | +     |       |       |       |       |       | 0     | 0     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| BDA2701  | Land at Crew's Hole Road, St George   | +            | +    | 0    | 0    | ++   | +    | 0    | ++   | ?    | 0     | 0     | 0     | ++    | ++    | +/?   | +     |       |       |       |       |       | +     | +     | +/?   | ?     | ?     | +     | +     |       | -/?   | ?     | -     | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| BDA2702  | Land at corner of Bryants Hill and Furber Road, St George                     | +            | +    | 0    | 0    | +    | +    | 0    | -    | ?    | 0     | 0     | 0     | ++    | ++    | +/?   | +     |       |       |       |       |       | -     | -     | 0     | ?     | ?     | +     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| 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 Blackwarth 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     | 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     | ?     | ?     | 0     | ?     |
| BDA2902  | Works at Felstead Rd  | +            | +    | 0    | 0    | +    | +    | 0    | ++   | ?    | ++    | ++    | 0     | ++    | +     | +/?   | +     |       |       |       |       |       | +     | +     | 0     | ?     | ?     | ?     | +     |       | -/?   | ?     | ++    | ?     | 0     | -/?   | 0     | 0     | 0     | ?     | ?     | 0     | ?     |
| BDA3001  | Land at North Street / Durnford Street, Southville                            | +            | +    | 0    | 0    | ++   | +    | 0    | ++   | ?    | +     | +     | -     | ++    | +     | +/?   | +     |       |       |       |       |       | +     | +     | 0     | -/?   | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | -     | ?     | ?     | +     | ?     |       |
| BDA3002  | 1-7 Smyth Road, Southville  | +            | +    | 0    | 0    | +    | +    | 0    | ++   | ?    | 0     | 0     | 0     | ++    | +     | +/?   | +     |       |       |       |       |       | +     | +     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | +     | ?     |       |
| BDA3101  | Greville EPH, Lacey Road, Stockwood   | +            | +    | 0    | 0    | ++   | +    | 0    | +    | ?    | 0     | 0     | 0     | ++    | +     | +/?   | +     |       |       |       |       |       | 0     | 0     | 0     | ?     | ?     | +     | +     |       | -/?   | ?     | ++    | ?     | 0     | -/?   | 0     | 0     | 0     | ?     | ?     | 0     | ?     |
| BDA3201  | Land at Sanctuary Gardens, Sneyd Park   | +            | +    | 0    | 0    | ++   | 0    | 0    | +    | ?    | 0     | 0     | 0     | ++    | +     | +/?   | -     |       |       |       |       |       | 0     | 0     | +/?   | ?     | ?     | +     | +     |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | 0     | ?     | ?     | 0     | ?     |       |
| BDA3401  | 122 Bath Road, Totterdown   | +            | +    | 0    | 0    | +    | +    | 0    | +    | ?    | +     | +     | -     | ++    | ++    | +/?   | +     |       |       |       |       |       | 0     | 0     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | -     | ?     | ?     | 0     | ?     |       |
| BDA2101  | 94-96 & 119 Cumberland Road, Spike Island                                     | +            | +    | 0    | 0    | +    | ++   | 0    | ++   | ?    | 0     | 0     | -     | ++    | ++    | +/?   | +     |       |       |       |       |       | 0     | 0     | +/?   | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | -     | ?     | ?     | +     | ?     |       |
| BDA2401  | Bridge Farm, Land at South Hayes, Lockleaze                                   | +            | +    | ++   | ++   | --   | 0    | -    | -    | ?    | 0     | 0     | -     | ++    | ++    | +/?   | +     |       |       |       |       |       | -     | -     | +/?   | --/?  | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | -     | ?     | ?     | 0     | ?     |       |
| BDA2002  | 272-276 and 290-298 Southmead Road  | +            | +    | 0    | 0    | +    | +    | 0    | ++   | ?    | 0     | 0     | 0     | ++    | ++    | +/?   | +     |       |       |       |       |       | 0     | 0     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | -/?   | 0     | 0     | 0     | ?     | ?     | 0     | ?     |
| BDA2403  | Former Gas Holder Site, Glenfrome Road  |              |      |      |      | ++   |      | 0    |      |      | 0     | 0     | -     |       | ++    | +/?   |       | +     | +     | +     | +     | ?     | 0     | 0     | 0     | ?     | ?     | ?     | ++    |       | -/?   | ?     | ++    | ?     | 0     | 0     | 0     | -     | ?     | ?     | 0     | ?     |       |

Table 16 Assessment of March 2019 Draft Local Plan Industry and Distribution Area Allocations against Appendix 2 Framework

|        | Site Name   | 1    |      |      |      | 2    |      |      | 3    | 4    | 5     |       | 6     |       | 7     |       | 8     |       |       |       |       | 9     | 10    | 11    |       | 12    | 13    |       | 14    |       | 15    |       | 16    |       |       | 17    | 18    |       |       |       |       |       |       |   |   |
|--------|---|------|------|------|------|------|------|------|------|------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---|---|
|        |   | DMC1 | DMC2 | DMC3 | DMC4 | DMC5 | DMC6 | DMC7 | DMC8 | DMC9 | DMC10 | DMC11 | DMC12 | DMC13 | DMC14 | DMC15 | DMC16 | DMC17 | DMC18 | DMC19 | DMC20 | DMC21 | DMC22 | DMC23 | DMC24 | DMC25 | DMC26 | DMC27 | DMC28 | DMC29 | DMC30 | DMC31 | DMC32 | DMC33 | DMC34 | DMC35 | DMC36 | DMC37 | DMC38 | DMC39 | DMC40 | DMC41 | DMC42 |   |   |
| IDA001 | Ashley Hill, St. Werburgh's                                 |      |      |      |      | ++   | +    | 0    |      |      | 0     | 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     | ?     |   |   |
| IDA004 | Brislington Trading Estate / Bath Road (north)              |      |      |      |      | ++   | +    | 0    |      |      | +     | +     | -     |       | +     |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | -     | ?     | ?     | 0     | ?     |   |   |
| IDA005 | Bush Industrial Estate, Whitehall                           |      |      |      |      | ++   | +    | 0    |      |      | 0     | 0     | -     |       | +     |       |       | +     | +     | +     | +     | ?     | 0     | 0     | 0     | ?     | ?     | 0     | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | -     | ?     | ?     | 0     | ?     |   |   |
| IDA006 | Cater Road, Bishopsworth / Hartcliffe                       |      |      |      |      | ++   | +    | 0    |      |      | +     | +     | 0     |       | ++    |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | -/?   | -/?   | ?     | +/?   | ++    |       | -/?   | ?     | -/?   | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA007 | Central Park, Petherton Road, Hengrove                      |      |      |      |      | ++   | +    | 0    |      |      | 0     | 0     | 0     |       | 0     |       |       | +     | +     | +     | +     | ?     | 0     | 0     | 0     | ?     | ?     | 0     | 0     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA008 | City Business Park, Easton                                  |      |      |      |      | ++   | +    | 0    |      |      | +     | +     | -     |       | +     |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | -/?   | ?     | ?     | 0     | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | -     | ?     | ?     | +     | ?     |   |   |
| IDA009 | East of Kingsland Road, St. Philip's                        |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | -     |       | +     |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | -     | ?     | ?     | +     | ?     |   |   |
| IDA010 | East of Midland Road, Old Market                            |      |      |      |      | ++   | ++   | 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     | -/?   | ?     | +/?   | +     |       | -/?   | ?     | -/?   | ?     | -/?   | ?     | ?     |       | -     | ?     | ?     | +     | ?     |   |   |
| IDA013 | Fishponds Trading Estate, Eastville                         |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | 0     |       | ++    |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | ++    |       | -/?   | ?     | 0     | ?     | -/?   | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA014 | Hawkfield Business Park, Hartcliffe                         |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | 0     |       | ++    |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | ++    |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | +     | ?     |   |   |
| IDA015 | Liberty Industrial Park, Ashton Vale                        |      |      |      |      | ++   | ++   | 0    |      |      | 0     | 0     | 0     |       | +     |       |       | +     | +     | +     | +     | ?     | 0     | -/?   | 0     | -/?   | ?     | +/?   | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | +     | ?     |   |   |
| IDA016 | Lodge Causeway (west), Fishponds                            |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | 0     |       | ++    |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | ++    |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA017 | Malago Vale Estate, Windmill Hill                           |      |      |      |      | ++   | ++   | 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     | ?     |   |   |
| IDA020 | New Gatton Road, St. Werburgh's                             |      |      |      |      | ++   | ++   | 0    |      |      | 0     | 0     | -     |       | +     |       |       | +     | +     | +     | +     | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | -     | ?     | ?     | 0     | ?     |   |   |
| IDA021 | Nover's Hill / Hartcliffe Way, Knowle                       |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | 0     |       | ++    |       |       | ++    | +     | ++    | ++    | ?     | 0     | -/?   | 0     | -/?   | ?     | +/?   | ++    |       | -/?   | ?     | -/?   | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA022 | Roman Farm Road, Hengrove                                   |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | 0     |       | ++    |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | ++    |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA023 | South Liberty Lane / Brook Gate, Ashton Vale                |      |      |      |      | ++   | +    | 0    |      |      | +     | +     | 0     |       | +     |       |       | ++    | +     | ++    | ++    | ?     | 0     | -/?   | 0     | -/?   | ?     | +/?   | +     |       | -/?   | ?     | -/?   | ?     | 0     | ?     | ?     | 0/?   | ?     | ?     | ?     | +     | ?     |   |   |
| IDA024 | St Anne's Road (north), St. Anne's                          |      |      |      |      | ++   | ++   | 0    |      |      | 0     | 0     | 0     |       | +     |       |       | +     | +     | +     | +     | ?     | 0     | 0     | -/?   | -/?   | ?     | +/?   | +     |       | -/?   | ?     | -/?   | ?     | -/?   | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA025 | St Anne's Road (south), St. Anne's                          |      |      |      |      | ++   | ++   | 0    |      |      | 0     | 0     | 0     |       | +     |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | -/?   | -/?   | ?     | +/?   | +     |       | -/?   | ?     | -/?   | ?     | -/?   | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA026 | St Gabriel's Business Park / Easton Business Centre, Easton |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | -     |       | +     |       |       | ++    | +     | ++    | ++    | ?     | 0     | 0     | 0     | ?     | ?     | 0     | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | -     | ?     | ?     | 0     | ?     |   |   |
| IDA028 | Vale Lane / Hartcliffe Way, Bedminster Down                 |      |      |      |      | +    | ++   | 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     |       | -/?   | ?     | +/?   | ?     | -/?   | ?     | ?     |       | ?     | ?     | ?     | +     | ?     |   |   |
| IDA031 | Whitby Road (south), Brislington                            |      |      |      |      | ++   | +    | 0    |      |      | 0     | 0     | -     |       | 0     |       |       | +     | +     | +     | +     | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | 0     |       | -/?   | ?     | +/?   | ?     | -/?   | ?     | ?     |       | -     | ?     | ?     | 0     | ?     |   |   |
| IDA032 | Whitby Road (west), Brislington                             |      |      |      |      | ++   | ++   | 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     | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |
| IDA036 | New Station Way   |      |      |      |      | ++   | ++   | 0    |      |      | +     | +     | 0     |       | +     |       |       | +     | +     | +     | +     | ?     | 0     | 0     | 0     | -/?   | ?     | +/?   | +     |       | -/?   | ?     | 0     | ?     | 0     | ?     | ?     |       | ?     | ?     | ?     | 0     | ?     |   |   |



**Table 18 Predicting the Total Plan Effects**

| SEA Topic                                | Sub-Topic and Total Plan Impacts   |
|--|--|
| <p>Population, housing and community</p> | <p><b>Housing supply (Objective 1 and 2)</b></p> <p>A core objective of the Local Plan Review is the delivery of new and affordable housing. This is evident through the housing targets of a minimum 33,500 new and affordable homes to be delivered by 2036, and for this to be exceeded where this is supported by service and infrastructure capacity. This target was set by a strategic level plan (the now withdrawn JSP) for the entire Housing Market Area, and therefore further work must be undertaken to understand how this target may have changed.</p> <p>The preferred approach for the Local Plan’s development strategy is based a range of sources of supply, including completions, commitments, maximising the best use of existing allocations, small sites, efficient use of land realised through urban potential and some Green Belt release. Whilst the Local Plan Review 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 GRAs, site allocations and emphasis on urban potential supply, in combination with Tall Buildings and Urban Living draft 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 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>Draft Policy E1 Inclusive economic development, Draft Policy E7 New workspace within mixed use development, Draft Policy E9 Digital Connectivity, alongside the climate change policies do have the potential to place viability burdens on housing delivery, which may have neutral or uncertain effects.</p> |
|  | <p><b>Community activities and key services (Objective 3 and 4)</b></p> <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 Draft Development Strategy policies include place principles that require provision of additional retail development or community services, and as such, provide positive effects for this theme. However, as there are some draft site allocations which are located beyond easy walking distance of key services, or some DS are silent on provision, the effect is not considered to be significant positive overall.</p> <p>In addition, existing policies of the adopted Local Plan continue to provide an up to date framework to support, retain and enhance the provision for community facilities in Bristol. In relation to shopping, services and the evening economy, retained policies are also carried through the new Local Plan; as these have already been considered as part of previous SA process, specific effects of these policies are not evaluated in this section.</p>  |
| <p>Health and inequalities</p>           | <p><b>Reducing inequality for those living in areas of concentrated disadvantage (Objective 5) and ensuring access to education (Objective 7)</b></p> <p>The Plan could help to reduce inequalities through the provision of more affordable and a balanced mix of housing, protecting strategic employment sites, opportunities for local training and employment, active travel infrastructure and better transport. 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 GRAs are located in areas of high deprivation, and therefore offer clear opportunities for regeneration and investment in deprived areas; this is will be subject to implementation, including delivery of affordable housing, access to employment / educational facilities and whether <i>Draft Policy E1 Inclusive Economic Development</i> applies.</p> <p>By encouraging efficient use of land and concentrating development within sustainable locations, both draft policies and site allocations largely ensure that educational services are located within easy walking distance of development. The development of new university campus for University of Bristol is referenced in Draft 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 Growth and Regeneration Areas or training centres, nor do policies or draft allocations specifically require socially inclusive facilities. Total effects for education are also unknown as these are partially linked to the extent of developer contributions</p>  |

| SEA Topic   | Sub-Topic and Total Plan Impacts   |
|---|--|
|   | under Draft Policy IDC1. While it is unknown at this stage, it is anticipated that provision would match delivery of housing development through GRAs and other sites within the plan area.  |
|   | <b>Healthy lifestyles (Objective 6)</b>  |
|   | <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 (Draft Policy DC1) is required to be delivered in accordance with quality space standards. Draft site allocations alongside housing and design policies (Draft Policy DC1 – DC3) also focus on the overall quality of homes, which is considered to potentially benefit public health levels, particularly where housing is delivered in areas of high deprivation.</p> <p>In addition, allocating GRAs 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 (Draft Policy UL1 and UL2). Policies that encourage uptake of cycling and active travel to office development also contribute to positive effects for health (Draft Policy T4).</p> <p>Protection of the city’s valued green spaces (Draft Policy GI1 – 4), including allotment and food-growing land, 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 (Draft Policy DC1) and safeguarding Local Green Spaces (Draft Policy GI1) could ensure access to spaces which ensure that the City is open to older people. Students and young children alike.</p> <p>However, given that several of the GRAs and 30 draft site allocations are located in an Air Quality Management Area (AQMA) or a cumulative impact zone, a significant proportion of the future communities could risk higher exposure to nitrous dioxide and particulate matter in the absence of mitigation. Updating access to open space standards would enable benefits of policies GI1-4 to be maximised.</p>  |
| <b>Economy and employment</b>   | <b>Strategic employment (Objective 8)</b>  |
|   | <p>Following the Economic Development Needs Assessment (EDNA) (2016) and direction of the JSP, the overall strategy of the draft Local Plan (Draft Policy E2) is to focus growth in the city centre, the Temple Quarter Enterprise Zone (TQEZ) (Draft Policy DS2, DS3 and E3) and Avonmouth Severnside Enterprise Area (ASEA) (Draft Policy E5). Elsewhere, employment uses would be concentrated efficiently on new Industrial and Distribution Areas (IDAs) (Draft Policy E4), separate employment allocations and new workspaces within mixed use developments (Draft Policy E7). The Bristol Port is identified as a strategic infrastructure employment location. In protecting these key areas, the Local Plan aligns with the Local Industrial Strategy’s ambitions for economic and specific sectoral growth.</p> <p>The Draft Plan would therefore ensure that there is a range of high quality employment spaces which meet the identified needs of all communities and employers within the city. However, without a breakdown of employment space by sector or type of employment use, it is not yet possible to accurately assess whether the draft Local Plan would support opportunities for growth of priority employment sectors.</p> <p>In addition, as underused land within IDAs can be used for Community -led housing exception sties (Draft Policy H5) and homes are proposed on former PIWA sites (Draft Policy H1 and DA1), the extent to which the draft Local Plan will regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment is uncertain. 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, this may result in incremental loss of the city’s available future employment land, potentially at odds with the Local Industrial Strategy. Mitigation could include a ‘no net loss of employment /FTEs’.</p> |
|   | <b>Digital connectivity and zero-carbon employment spaces (Objective 8)</b>  |
| <p>Local Plan objectives promote development of modern workspaces and digital infrastructure in alignment with readily available technologies. 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 draft policies (Climate Change and Transport).</p> |  |
| <b>Townscape and landscape</b>  | <b>Historic environment, townscape, and landscapes (Objective 10)</b>  |
|   | Housing and employment development, alongside infrastructure delivery, may have effects on the historic  |

| SEA Topic                     | Sub-Topic and Total Plan Impacts   |
|-------------------------------|--|
|                               | <p>environment if these do not conserve or enhance the designated heritage assets, townscape or landscape, as required by legislation<sup>84</sup>, draft policies and existing adopted policies.</p> <p>The Local Plan objective to ‘exceed 33,500 homes’ without an overall cap on the number of units may result in significant impacts upon historic townscape and urban landscape of the City Centre in particular (Draft Policy H1). Where this includes tall buildings, draft 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 GRAs 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 (Draft 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 for the historic environment, the overall effect is uncertain and subject to implementation.</p> <p>This will require provision of further evidence of effects (at an individual site, character and townscape / landscape level) and how these could be mitigated.</p> |
|                               | <p><b>Biodiversity and landscape (Objective 11)</b></p>  |
|                               | <p>The Plan seeks to protect a hierarchy of statutory sites and local wildlife corridors, with the majority of GRAs being located outside of designated sites. However, there are some instances where proposed development boundaries overlap with these ecological designations (i.e. Draft Policy DS4 Western Harbour and Draft 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. This will require further consideration through a Habitat Regulation Assessment.</p> <p>Achieving a net gain in biodiversity is promoted through retained policies, however this is not currently supported by a clear calculation method approved by BCC, which may limit planning enforcement of this requirement.</p> <p>Similar to the above, through seeking to ‘exceed 33,500 homes’ development may negatively affect biodiversity and the natural landscape in the absence of sufficient mitigation.</p>   |
|                               | <p><b>Green and Blue Infrastructure (Objective 12)</b></p>   |
|                               | <p>The Plan introduces a greater level of protection of green spaces through Local Green Space policy (draft 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) (Draft Policy GI2 and 3).</p> <p>The importance of achieving net gains for biodiversity, food growing, and recreational green space is highlighted within the Draft 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 GRA and 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.</p> <p>Limited reference is made to the provision of blue infrastructure.</p>   |
| <p>Transport and movement</p> | <p><b>Sustainable Transport (Objective 13)</b></p> <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 (Draft Policy T1). 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 draft site allocations which are located beyond easy walking distance of key services which could result in negative effects associated with increased use of private cars. Several of the Growth and Regeneration Areas perform less well in terms of overall accessibility, however where connectivity and active travel improvements are proposed within the draft policy text.</p> <p>The Plan’s major transport proposals are however subject to further consideration (as set out in draft policy T2). The extent of positive effects for sustainable transport are also reliant upon the JSP authorities working together to meet housing need, and this will also require consideration of associated transport interventions to prevent unsustainable in-commuting.</p>                         |

<sup>84</sup> 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   |
|--|--|
|  | <p><b>Active travel (Objective 14)</b></p>   |
|  | <p>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 T4 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.</p>  |
| <p>Climate, energy and waste</p>                     | <p><b>Flood risk (Objective 15)</b></p>  |
|  | <p>Flood risk is considered in the process of allocating sites for development and in considering development proposals for non-allocated sites.</p> <p>However, 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 Flood Zone 2 and 3a. Draft 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.</p> <p>Retained Policies BCS16 and BCAP5 would continue to guide flood risk and management within the Plan area. The requirements for SuDS and flood resilience design is considered to minimise impacts of flooding in at risk locations. In addition, 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>It may also be the case that flood resilience/management infrastructure is delivered in parallel to major development (e.g. Draft Policy DS4 Western Harbour), to mitigate flood risk.</p>  |
|  | <p><b>Sustainably manage natural resources (Objective 16)</b></p>  |
|  | <p>Waste planning matters are primarily addressed through the West of England Joint Waste Core Strategy. The Local Plan promotes resource efficient and low impact construction for all new development, embodying ‘circular economy’ principles (Draft Policy CCS1 and CCS4) 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> <p>In addition, there are several vulnerable water bodies within the Plan area (those that are currently classified by the Environment Agency as ‘Poor’ or ‘Bad’ in status<sup>85,86</sup>). Site allocations and Growth and Regeneration Areas located adjacent to these sources could be affect 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 CCS4).</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 GRAs and IDAs are located near vulnerable water bodies (River Avon catchment).</p> |
| <p><b>Air and noise pollution (Objective 17)</b></p> |  |

<sup>85</sup> List of Vulnerable Water Bodies- Avon Bristol Urban catchment:  
<https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3046/classification?item=106&status=Fail&status=Fail&status=Bad>

<sup>86</sup> Pinpoint data – river water quality 2013. <https://maps.bristol.gov.uk/pinpoint/>

| SEA Topic | Sub-Topic and Total Plan Impacts   |
|-----------|--|
|           | <p>A significant proportion of the Local Plan’s GRAs, 30 draft 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 should be tested further through HRA process.</p> <p>Draft policies that support delivery of electric vehicle infrastructure (Draft Policy T5) 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><b>Energy efficiency and renewable energy (Objective 18)</b></p>  |
|           | <p>The Local Plan strongly supports energy efficient design and construction, including through efficient heat networks and PassivHaus design. 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, which 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 March 2019 Consultation Draft Plan, the main secondary effects include:

- Potential public and mental health benefits from increasing setting 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 improve overall affordability of homes and reduce inequalities, whilst ensure access to private and public open space, services and active travel infrastructure.
- Whilst improving access to workspaces for SMEs, there is potential for displacement of large floorspace and typically lower-value employment to strategic employment areas (particularly at Avonmouth). 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. This is likely to be particularly sensitive to Covid recovery and future working patterns.
- The amount of housing needed and housing target set by the JSP was in part based on increasing densities and maximising urban capacity of under-used urban land. Subject to reconfirming housing need through the replacement Spatial Development Strategy, and confirming availability of urban potential supply where possible, this may result in cross-boundary collaboration to delivery Bristol’s local housing need.

- Whilst the Local Plan overall is seeking to maximise the 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 CCS1 – CCS5).
- Secondary impacts on design and character of the city overall through 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.
- 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 19 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, either in existence or forthcoming, that may enhance the synergistic or cumulative effects of the Local Plan Review.

**Table 19 Assessment of Cumulative Effects**

| SA Objective  | Total plan effects (Table 18)   | 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 Review is the delivery of new and affordable housing. This is evident through the housing targets of a minimum 33,500 new and affordable homes to be delivered by 2036, and for this to be exceeded where this is supported by service and infrastructure capacity. This target was set by a strategic level plan (the now withdrawn JSP) for the entire Housing Market Area, and therefore further work must be undertaken through the Spatial Development Strategy to understand how this target, and affordable housing requirements, need to change. |  |                    |
| 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 effects on other objectives, including Objectives 6, 12 and 17 in particular.  |  |                    |
| 3. Ensure easy and affordable access to key services  | +   | -/?                                      | +/?                |
|   | Overall, the Plan’s development strategy seeks to locate development within accessible distances to key services (local, town or district centres); albeit there some site allocations and Growth and Regeneration Areas which are less easily accessed. 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 Growth and Regeneration Areas require this, or through developer contributions. Whilst draft policies require: consideration of the ‘agent of change’ principle to protect noise-generating uses, 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  | +   | -/?                                      | +/?                |

| SA Objective  | Total plan effects (Table 18)   | Likely future without the plan (Table 6) | Cumulative effects |
|---|---|--|--------------------|
| poverty and income inequality and quality of life for those in areas of disadvantage.     | <p>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.</p> <p>Without a Local Plan, and strategic targeting of deprivation, the most deprived areas may continue to see no change in the current situation.</p> <p>Development of draft site allocations, IDAs and GRAs 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.</p>   |  |                    |
| 6. To reduce health inequalities and promote healthy lifestyles across the city           | +   | -/?                                      | +/?                |
|   | <p>Bristol experiences significant health and wellbeing inequalities.</p> <p>The Plan's development strategy seeks to regenerate more deprived areas through targeting investment to the Growth and Regeneration Areas 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.</p> <p>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. Relevant interacting plans and strategies for green infrastructure and air quality are detailed in Objectives 12 and 17.</p>  |  |                    |
| 7. Ensure access to education and learning for all sections of society                    | -   | -  | 0/?                |
|   | <p>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.</p> <p>The Plan supports university expansion at Bristol Temple Quarter in Draft 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.</p>  |  |                    |
| 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, employment allocations, concentrated employment uses on Industrial and Distribution Areas and development of 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, potentially at odds with the Local Industrial Strategy. Mitigation could include a 'no net loss of employment /FTEs' or sector specific development quantum for each employment type.</p> <p>The cumulative effect of the UK-EU Trade and Cooperation Agreement and the pandemic will need to be considered further, with reference to the One City Economic Recovery and Renewal Plan<sup>87</sup>, and similarly, the West of England Recovery Plan<sup>88</sup>.</p> |  |                    |
| 9. Ensure access to a range of shopping facilities for all sections of society            | 0/?   | -/?                                      | +/?                |
|   | <p>While the Plan does not introduce new policy in relation to retail development, it would retain existing policies for this provision; and include requirements for the protection and redevelopment of Broadmead (DS1 Policy) as a key shopping area and local centres for workspaces (E2).</p> <p>While there are unknowns regarding the medium-long term use of local centres and the high street following the Covid-19 pandemic, the Plan focuses development within the urban area and Urban Living principles, which could cumulatively benefit the vibrancy of local centres and ensure that, in</p>  |  |                    |

<sup>87</sup> <https://www.bristoloncity.com/wp-content/uploads/2020/10/One-City-Economic-Recovery-Plan.pdf>

<sup>88</sup> <https://www.westofengland-ca.gov.uk/wp-content/uploads/2020/10/West-of-England-Recovery-Plan.pdf>

| SA Objective  | Total plan effects (Table 18)  | Likely future without the plan (Table 6) | Cumulative effects |
|---|--|--|--------------------|
|   | most cases, there is sufficient access to shopping facilities for local communities.   |  |                    |
| 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 GRAs 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 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, however, impacts could be cumulative where development sites (including Growth and Regeneration Areas) overlap or are located within impact zones of these habitats. This is particularly the case at Avonmouth, where the impact of the employment allocations and site allocations should be explored within the HRA process.</p> <p>Other plans, programmes, strategies or forthcoming evidence that would influence effects and/or enhance understanding of cumulative impacts include: The Bristol Biodiversity Action Plan<sup>89</sup> The One City Ecological Emergency Strategy<sup>90</sup> and use of Nature Recovery Networks<sup>91</sup>, supported by the 25-Year Environment Plan. In addition, the successful ascent of the Environment Bill is likely to mandate the requirement for Biodiversity Net Gain within development, which could improve the quantity and quality of available wildlife sites across the Plan area.</p> |  |                    |
| 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 Avon River 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 strategy<sup>92</sup>, which will be updated in the future.</p> <p>Other interacting strategies and plans that could generate cumulative effects across the Plan area and beyond include the West of England's Joint Green Infrastructure Strategy; and the National Framework of Green Infrastructure Standards for England.</p>   |  |                    |
| 13. To encourage  | +  | --/?                                     | +                  |

89 <https://www.bristol.gov.uk/documents/20182/35052/BBAP.pdf/9074afdf-8f21-4296-b457-bc50830f0efc>

90 <https://www.bristolonecity.com/wp-content/uploads/2020/09/One-City-Ecological-Emergency-Strategy-28.09.20.pdf>

91 <https://www.gov.uk/government/publications/nature-recovery-network>

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

| SA Objective   | Total plan effects (Table 18)   | Likely future without the plan (Table 6) | Cumulative effects |
|--|---|--|--------------------|
| a demonstrable modal shift and reduce the need to travel   | <p>The Bristol Transport Strategy recognises that the city has an above national uptake of cycling and increased use of public transport, however, congestion and air quality problems persist and are set to worsen.</p> <p>The Plan promotes walking and cycling, with the majority of Growth and Regeneration Areas 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 also encourage more people to walk to local services. However, housing development that is 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. Other relevant plans include the Network Rail Delivery Plan (2019-2024) and successive plans across the Local Plan period up to 2036. Delivery of the Great Western electrification project will improve services into and out of the region, for which Bristol Temple Meads (within Draft Policy DS2) will be at the core.</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 Draft Policy T2, the delivery of JLTP4 schemes – including the A4174 South Bristol Link; MetroWest and Metrobus 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 and Highways England Road Investment Strategies (RIS), where these include funded local and regional schemes.</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.</p> <p>While the Plan includes retained flood management policies and sets out specific place principles for Growth and Regeneration Areas and Site Allocations located within flood risk zones, overall flood risk for the Plan area needs to be assessed at a strategic level, being informed by the latest evidence and climate change projections in an updated strategic flood risk study.</p> <p>Other plans, programmes, strategies that would enhance flood resilience include the Bristol Tidal Strategy (emerging in 2020/21).</p>   |  |                    |
| 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled | +   | -/?                                      | +                  |
|  | <p>Bristol's increased 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 be addressed through the Bristol Water - Water Resources Management Plan<sup>93</sup> 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   | -/?   | --/?                                     | +/?                |

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

| SA Objective   | Total plan effects (Table 18)   | Likely future without the plan (Table 6) | Cumulative effects |
|--|---|--|--------------------|
| and noise pollution  | <p>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>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 in-commuting from the Bristol Urban Area, there are multiple unknowns for air quality effects. Analysis will also need to account for potential employment behaviour changes post-Covid-19.</p> <p>The extent to which the Plan can improve the existing baseline in the absence of targeted measures and incentives outside the remit of planning may be limited. Effects will also be linked to the new Air Quality Action Plan (AQAP) for Bristol, which is due to be implemented by October 2021. Further measures will be taken to reduce transport emissions are also being considered for Bristol and would form a major part of the AQAP. This is likely to include several measures to promote more sustainable travel options across the city.</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 and per capita emissions have reduced by 45%, 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.</p> <p>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; Joint LEP South West Energy Strategy<sup>94</sup>; and West of England Climate Emergency Action Plan<sup>95</sup>, 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.

- Potential for reduced inequalities in areas of persistent deprivation through the provision of new affordable housing development and mixed types of housing (such as HMOs, elderly persons housing) alongside 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 employment 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 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 improve public health.

94 <https://heartofswlep.co.uk/wp-content/uploads/2019/07/HotSW-Dorset-CloS-Joint-LEP-Energy-Strategy-Framework.pdf>

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

- Increasing the number of homes delivered, ensuring efficient use of brownfield land and maximising densities could place significant pressure on both physical and social infrastructure. Whilst there are draft 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 significant upgrade.
- 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.
- Support 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. However, the response to strategic flood risks and water management will require updates
- There is relatively limited focus given to the effects of the Plan on habitats or ecological recovery. The combination of development proposals on SNCIs, adjacent of proposals to the international habitats of the River Severn and national habitats of the River Avon, and lack of biodiversity net gain policy could result in synergistic negative impacts on these habitats.

## 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 effects are mitigated from **Appendix 3 Assessing the effects of the draft Local Plan Review policies** and **Appendix 4 Predicting and evaluating the effects of Local Plan March 2019 Consultation Draft 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.

### 7.2 Mitigation for Draft Local Plan Policies

The March 2019 Consultation Draft Local Plan represents a relatively early stage of the plan-making process (second Regulation 18 consultation). Since this consultation took place, the Joint Spatial Plan has been withdrawn and the UK has experienced significant structural shocks in the form of the Covid-19 pandemic and UK-EU Trade and Cooperation Agreement. Mitigation measures will therefore need to be updated in light of these significant changes, and future iterations of the Plan and SA will set out a reformed list of measures, alongside the rationale for inclusion or exclusion of these measures from later stages of the Plan.

**Table 20 General Mitigation Measures for Local Plan Policies**

| Policy theme                        | Generalised Mitigation Measures  | Generalised opportunities to Maximise Benefits   |
|-------------------------------------|--|--|
| Draft Development Strategy Policies | <ul style="list-style-type: none"> <li>Establish the exceptional circumstances case for the release of Green Belt sites and consider Green Belt compensatory measures.</li> <li>For GRAs located within AQMAs, mitigation should be based upon the new Air Quality Action Plan (due for publication).</li> <li>Establish level of greenfield land to be maintained within the GRAs.</li> <li>Undertake Sequential Test to ensure development is located outside of current and future floodplains.</li> <li>Require appropriate reference to climate change allowances within flood risk assessments, and consider impact of the emerging Bristol Avon Flood Strategy.</li> <li>Define the explicit number of units to be delivered and affordable housing amount for individual GRAs within policy text.</li> <li>Ensure physical and catchment access to emerging educational proposals from adjacent neighbourhoods outside the GRAs.</li> <li>Conserve and enhance ecological networks associated with Growth and Regeneration Areas.</li> <li>Set out specific requirements for ensuring townscape and landscape features are conserved and enhanced within policy text.</li> </ul> | <ul style="list-style-type: none"> <li>Ensure connection to heat networks, with enhancement / further provision by developers as required.</li> <li>Prepare / reference spatial frameworks or design codes for each GRA.</li> <li>Define facilities and services which could contribute to the diversity of the city centre and set out specific requirements for GRAs.</li> <li>Ensure inclusive public realm within place requirements, to provide stronger connections to adjacent areas.</li> <li>Detail specific GI, pedestrian and cycling connections and coordinate these with the Strategic GI Strategy.</li> <li>Ensure that retail service provision within GRAs follows the retail hierarchy for the area.</li> <li>Set out required infrastructure provision in conjunction with Draft Policy IDC1.</li> <li>Support delivery of flexible and/or co-working and zero carbon forms of workspace/office space.</li> <li>Define food systems infrastructure and identify suitable locations for other recycling uses within GRAs.</li> </ul> |

| Policy theme  | Generalised Mitigation Measures   | Generalised opportunities to Maximise Benefits  |
|---|---|---|
| Draft Infrastructure and Developer Contributions Policy | <ul style="list-style-type: none"> <li>• Provide updated requirements for planning obligations in relation to affordable housing.</li> <li>• Provide requirements for delivery for all types of infrastructure provision within draft policy, now that guidance indicates that this should not be within supporting evidence or SPDs.</li> </ul>  | <ul style="list-style-type: none"> <li>• Reference inclusive, high-quality streetscape design that maximises benefits for GI and climate resilience.</li> </ul>   |
| Draft Urban Living Policies                             | <ul style="list-style-type: none"> <li>• Presumption against design/density that would create adverse impact on health and well-being.</li> <li>• 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'.</li> <li>• Consider reference that that densities below the minimum may be acceptable where they would protect the character / setting of biodiversity or geodiversity assets.</li> </ul>  | <ul style="list-style-type: none"> <li>• Reference to appropriate densities for mixed uses.</li> <li>• Suggest integration of higher density proposals with existing or proposed green space.</li> </ul>  |
| Draft Housing Policies                                  | <ul style="list-style-type: none"> <li>• Additional information / justification is required for appropriate housing mix.</li> <li>• Provide reference to updated affordable housing guidance and targets.</li> <li>• Consider prescribing target densities for self-build and community-led sites.</li> <li>• Guidance for how self-build or community-led proposals would need to demonstrate and mitigate loss of redundant community facilities / underused land in IDAs.</li> <li>• Provide evidence of optional technical standards for accessible homes.</li> <li>• Provide evidence of supply of gypsy and traveller sites.</li> </ul> | <ul style="list-style-type: none"> <li>• Include a broader reference to the definition of 'healthy place' within the context of housing development, as set out in updated PPG and the National Design Guide. Reference required accessibility standards for disabled persons by type of development.</li> <li>• Consider a prescribed mix of uses on purpose built student accommodation sites (as part of 'active frontages').</li> </ul>   |
| Draft Employment Policies                               | <ul style="list-style-type: none"> <li>• Strengthen draft policy to ensure reference is made to Local Industrial Strategy priority sectors.</li> <li>• Require redevelopment of all business use sites to include workspace within mixed use development uses.</li> <li>• Set employment land quantum by employment use and / or sector, and potential at a GRA level.</li> <li>• Include sufficient 'move on' space within the City to accommodate any employment expansion, growth and churn.</li> <li>• Include a 'no net loss of employment /FTEs' or sector specific development quantum for each employment type.</li> </ul>            | <ul style="list-style-type: none"> <li>• Require all new developments of homes or workspace, above the size threshold, to contribute to employment initiatives and skills development during the construction phase.</li> <li>• Ensure skills development and employment initiatives are located within easy access to reduce the need to travel for learning / employment.</li> <li>• Within areas of higher deprivation, ensure that there is 'no net loss' of jobs where proposals are made for the development of or redevelopment for industrial and distribution premises.</li> </ul> |
| Draft Green Space Policies                              | <ul style="list-style-type: none"> <li>• Access to open space to be informed by NPOS evidence base and updated Parks and Green Spaces Strategy to ensure equitable access.</li> <li>• Loss of GI should be replaced where it would enhance cohesive GI networks, as set out within updated PPG<sup>96</sup>.</li> </ul>   | <ul style="list-style-type: none"> <li>• Make reference to biodiversity net gain.</li> <li>• Clarify the principles of 'harm' to LGS characteristics, role and harm, alongside 'proportional scale'.</li> <li>• Reference benefits of green space to health and well-being and for climate change resilience, including natural flood management and air quality.</li> </ul>  |

<sup>96</sup> MHCLG (2019). Planning Practice Guidance. Paragraph: 005 Reference ID: 8-005-20190721

| Policy theme                           | Generalised Mitigation Measures  | Generalised opportunities to Maximise Benefits   |
|--|--|--|
|  |  | <ul style="list-style-type: none"> <li>Reference role of sustainable food growing and protection of ecosystem services.</li> <li>Include reference to supporting the Strategic Green Infrastructure Network, and strengthen provision for blue infrastructure.</li> </ul>  |
| Draft Transport Policies               | <ul style="list-style-type: none"> <li>Set out transport schemes and infrastructure enhancements which are fundamental to plan delivery.</li> <li>Ensure implementation of EV infrastructure is not at the expense of a walkable/cyclable environment.</li> <li>Set out that provision of car parking should not be a reason for reduced affordable housing.</li> </ul>  | <ul style="list-style-type: none"> <li>Reference inclusive and accessible cycling for all users, including disabled people, the elderly and children.</li> <li>Reference inclusive, high-quality streetscape design that maximises benefits for GI and climate resilience; while prioritising walkable and cycle friendly streets.</li> <li>Consider financial contributions towards local car clubs / pooled cycles (including EVs and e-bikes), with management mechanisms in place to ensure that these are inclusive and affordable for all users.</li> <li>Consider design features, such as: <ul style="list-style-type: none"> <li>Use of natural surfacing / planting for highways / parking to help reintroduce biodiversity and offset CO2 emissions.</li> <li>Use of energy efficient lighting design and renewable power for EV charging.</li> </ul> </li> </ul>   |
| Draft Climate Change Policies          | <ul style="list-style-type: none"> <li>Make reference need to conserve / retain ecological networks and climate refugia within site-level adaptations.</li> <li>Consider development adjacent to underground or surface water bodies should be required to mitigate where harmful abstraction is proposed.</li> <li>Consider inclusion of 'embodied' carbon emissions alongside materials for whole-life assessment of development.</li> <li>Meet or exceed the recycling targets for waste streams and generating low-carbon energy from suitable remaining waste, with reference to specific targets.</li> </ul> | <ul style="list-style-type: none"> <li>Reference to use of natural resources / design that would respond to existing built environment, including heritage assets.</li> <li>Include reference to adaptive measures against latest climate change projections for flood risk, and reference to SuDS for water efficiency and harvesting.</li> <li>Develop stronger carbon offsetting and financial contribution guidance, including potential quantification of off-site contributions to support implementation of the policy.</li> <li>Consider the inclusion of 'unregulated' emissions within carbon offsetting target to maximise future performance of this policy.</li> <li>Develop specific guidance in respect of retrofitting existing buildings, including for change of use.</li> <li>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.</li> </ul> |
| Draft Design and Conservation Policies | <ul style="list-style-type: none"> <li>Consider methods for extending liveability requirements for Prior Approval applications for Permitted Development Right for residential</li> <li>Consider applying height restrictions in Conservation Areas or other sensitive locations. These could be defined in 'zones'.</li> <li>Account for designated heritage and biological assets in relation to tall building proposals.</li> </ul>   | <ul style="list-style-type: none"> <li>Reference use of design that would contribute to positive well-being e.g. biophilic design.</li> <li>Provide minimum liveability standards for short-term occupancy / identified occupier groups; and flexibility in space standards for community-led or co-housing developments.</li> <li>Consider reference / inclusion of Active Design guidance provided by Sport England for the design of inclusive private outdoor communal space.</li> <li>Reference to adapting internal and external spaces within residential development to climate change, particularly for vulnerable</li> </ul>   |

| Policy theme                        | Generalised Mitigation Measures   | Generalised opportunities to Maximise Benefits   |
|-------------------------------------|---|--|
|                                     |   | <p>users such as the older people and young children.</p> <ul style="list-style-type: none"> <li>• Consider additional requirements for development that relates or includes advertisements to account for local character.</li> <li>• Include required accessibility standards for disabled persons, by type of development.</li> </ul> |
| Draft Health and Wellbeing Policies | <ul style="list-style-type: none"> <li>• Potentially introduce development contributions / tariffs or a levy where development would create undue impact on the environment.</li> <li>• Consider provisions that directly address management of landfill waste produced by hot food and takeaway establishments.</li> <li>• Ensure proportionate contributions to air quality improvements elsewhere as part of mitigation requirements (including those identified in air quality action plans and low emission strategies).</li> <li>• Make reference to mitigation of air quality (e.g. acidification) impacts in respect of the natural environment, including for sensitive species and habitats.</li> <li>• Consider mitigation for air quality effects of Scope 3 emissions via private car or delivery related to A3 or A5 Uses Classes.</li> </ul> | <ul style="list-style-type: none"> <li>• Include guidance for proposals to improve air quality or mitigate impacts, including through GI provision and enhancement in development.</li> </ul>  |

### 7.3 Mitigation for Draft Local Plan Site Allocations

**Appendix 4** *Predicting and evaluating the effects of Local Plan March 2019 Consultation Draft 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 for these allocations was emerging during the March 2019 consultation draft.

Therefore, the framework to inform the prediction and evaluation of the effects of Local Plan March 2019 Consultation Draft Site Allocations and Growth and Regeneration Areas should be updated with the following revised evidence base documents:

- Open Space Assessment and Local Green Space (LGS) and Reserved Open Space (ROS).
- Infrastructure Study: To assess the capacity of associated infrastructure provision.
- Strategic Flood Risk Assessment (SFRA): Flood Risk data used within the framework is consistent with that which informed the March 2019 Consultation Draft Plan. The Revised SFRA was published in December 2020, and will require site allocations and GRAs to be reappraised against the content of this evidence base, and to enable a more accurate and up-to-date sequential test to be applied.
- Updated Bristol Transport Study and transport modelling: To take account of strategic schemes within JLTP4, proposed levels of growth and transport proposals within GRAs on the highway network, levels of congestion and air quality.
- Urban Potential Assessment, to determine effects on revised densities.

As above, future iterations of the Plan and SA will set out a reformed list of mitigation measures, alongside the rationale for inclusion or exclusion of these measures from later stages of the Plan.

**Table 21 General Mitigation Measures for Site Allocations (including IDAs)**

| SEA Topic                         | General Mitigation Measures for Site Allocations  |
|-----------------------------------|---|
| Population, housing and community | <ul style="list-style-type: none"> <li>Detailed mitigation and additional recommendations are proposed within the Housing Policies (Draft Policies H1-H7), and evidence-based requirements above, including that for self-build developments.</li> <li>Loss of community facilities, including recreational sites, to be justified through planning applications in accordance with local policy and the latest available PGSS.</li> </ul>  |
| Health and inequalities           | <ul style="list-style-type: none"> <li>For sites within or adjacent to AQMAs, ensure that any air quality improvement mitigation ties with the incoming BCC Air Quality Action Plan priorities and targets.</li> <li>Improve physical access to connections with Local Centres and community facilities.</li> </ul>   |
| Economy and employment            | <ul style="list-style-type: none"> <li>Detailed mitigation and additional recommendations are proposed within the Employment Policies (Draft Policies E1-E8), and evidence-based requirements above, including that to ensure a 'no net loss' of employment and FTEs for sites where redevelopment of employment land / industrial areas is proposed.</li> </ul>  |
| Townscape and landscape           | <ul style="list-style-type: none"> <li>For sites within the Avonmouth area, mitigation measures for biodiversity and habitats potentially affected by development would be detailed in the future Habitats Regulations Assessment (HRA).</li> <li>For sites with partial or full overlap with local ecological or geological sites, development considerations should contain adequate reference to mitigation and/or requirement for enhancement of such areas, such as biodiversity surveys, retention of important trees and consideration of SSSI buffer zones, in line with Natural England guidance.</li> <li>Delivery of biodiversity net gain through on- or off-site measures, or a combination of both.</li> <li>Consider opportunities to maximise multifunctional GI, particularly where this might overlap with areas of blue infrastructure.</li> <li>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.</li> </ul> |
| Transport and movement            | <ul style="list-style-type: none"> <li>Infrastructure provisions to encourage modal shift away from private car use (e.g. carpooling, public transport, cycle infrastructure and cycleways).</li> <li>Require appropriate walking and cycling provision where sites are relatively poorly accessed, to enable these be made attractive and routine modes of transport.</li> <li>Mitigate impact(s) of development proposals on the local highway network via traffic modelling.</li> </ul>  |
| Climate, energy and waste         | <ul style="list-style-type: none"> <li>In relation to development within flood risk areas, requirement that a Sequential Test is undertaken.</li> <li>Ensure development layout minimises risk for future occupants and/or neighbouring uses.</li> <li>Ensure that site-specific flood risk assessments and groundwater and surface flow assessments account for latest available climate change projection data.</li> <li>Include measures to reduce surface water runoff via SuDS.</li> <li>For sites adjacent to water bodies that are classified as 'poor' or 'moderate' in environmental status, site development could include off-site mitigation improvements.</li> </ul>   |

## 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 draft policies and site allocations, as detailed in **Appendix 3 Assessing the effects of the draft Local Plan Review policies** and **Appendix 4 Predicting and evaluating the effects of Local Plan March 2019 Consultation Draft 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. The latest available AMR at Interim SA stage is the 2019 AMR<sup>97</sup>, of which covers the period 1 April 2018 – 31 March 2019.

### 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.

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<sup>97</sup> <https://www.bristol.gov.uk/documents/20182/34184/Authority+Monitoring+Report/e403e9bc-36a1-45f6-a898-0b1424d2f7e8>

Table 22 Potential Monitoring Indicators

| SEA Theme  | SA Framework Objective  | Decision-making criteria   | Potential Key Monitoring Indicators <sup>98</sup>  |
|--|---|--|--|
| 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"> <li>• Numbers of homes granted permission and completions, and number of affordable housing units.</li> <li>• Performance of Bristol City Council against annual measurement against of housing delivery (e.g. the Housing Delivery Test, or equivalent).</li> <li>• Number of homeless households, estimates of over-crowded and concealed households, or number in temporary accommodation.</li> <li>• Number of conversions of offices to housing via permitted development rights.</li> </ul> |
|  |   | 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"> <li>• Proportion of population living in the most deprived 10% areas in England from Index of Multiple Deprivation.</li> <li>• Number of units secured as purpose built student accommodation completions.</li> <li>• Number of HMO planning applications and licensing data.</li> <li>• Percentage of development completed through alternative methods of delivery.</li> <li>• Number of households on the self-build and custom-housebuilding register for Bristol.</li> </ul>                 |
|  |   | Would development or policy provide an opportunity for a higher density within a sustainable location?   |  |
|  |   | 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  | Would development or policy result in a net gain of community or service facilities?   | <ul style="list-style-type: none"> <li>• Annual percentage of all homes (new and converted dwellings) built on brownfield land.</li> <li>• Proportion of site supply from Brownfield Land Register.</li> <li>• Average density of development (dwellings per hectare).</li> </ul>  |
|  |   | Would development or policy maintain greenfield land and maintain the openness and permanence of the Green Belt?   |  |
|  | Health and Inequalities   | 4. Increase participation in cultural and community activities   | Would development or policy provide an opportunity for the reuse or regeneration of previously developed land?   |
| Would development or policy provide an opportunity for a higher density within a sustainable location?   |   |  |  |
| 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 result in a net gain of community or service facilities?   | <ul style="list-style-type: none"> <li>• Number of organisations registered within the Voluntary, Community and Social Enterprise sector.</li> <li>• Amount of floorspace delivered for community and leisure uses within new developments.</li> <li>• Percentage of development within 800m of key services (e.g. GP, post office).</li> </ul>  |
|  |   | Would development or policy contribute to improvements in the built environment in deprived areas?   |  |
| 6. To reduce health inequalities and promote healthy lifestyles across the city  |   | 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"> <li>• Percentage of development in deprived areas (10% most deprived LSOAs) within the Index of Multiple Deprivation.</li> <li>• Percentage of population living in the most economically deprived 10% areas within the Index of Multiple Deprivation.</li> <li>• Percentage of city covered by an Air Quality Management Area.</li> </ul>  |
|  |   | Would development or policy contribute to improving air quality?   |  |
|  |   | 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?   |  |
| 7. Ensure access to education and learning for all sections of society   | Would development or policy make walking and cycling easy and attractive as routine methods of transport? | <ul style="list-style-type: none"> <li>• Difference in life expectancy and health between 10% least deprived areas and other areas of the city based on the Index of Multiple Deprivation.</li> <li>• Percentage of the population that report below average mental wellbeing, based on the Bristol Quality of Life Survey<sup>99</sup>.</li> <li>• Proximity to Key Walking Routes, as set by the Local Cycling and Walking Infrastructure Plan (LCWIP).</li> <li>• Proximity to cycle network or new LCWIP cycle networks.</li> <li>• Percentage of the population that cycle weekly, based on the Bristol Quality of Life Survey<sup>100</sup>.</li> </ul>  |  |
|  | Would development or policy result in a net gain of adequate educational facilities?                      |  |  |
| Economy and Employment   | 8. To support the economy and ensure that there are suitable opportunities for employment.                | Would development or policy ensure that educational services are located within easy walking distance?   | <ul style="list-style-type: none"> <li>• Percentage of population living in areas of education, skills and training deprivation, from the Index of Multiple Deprivation.</li> <li>• Percentage of population within 800m walking distance from an early years' facility or primary school.</li> <li>• Percentage of population within 1500m walking distance from a secondary school.</li> </ul>   |
|  |   | 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?   |  |
|  |   | Would development or policy support opportunities for growth (i.e. creation of employment spaces, supporting infrastructure etc.) in priority employment sectors?  |  |
|  |   | Would development or policy regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment?  |  |
|  | Would development or policy maintain existing strategic employment opportunities?                         | <ul style="list-style-type: none"> <li>• Amount of floorspace granted permission and completions of office, industrial and warehousing development.</li> <li>• Number of FTE in the priority employment sectors (specified by the Local Industrial Strategy).</li> <li>• Level of unemployment, based on the Employment Deprivation Domain Index (IMD data).</li> <li>• Number of planning applications / prior approvals within strategic employment areas (i.e. applications for retention by sqm).</li> <li>• Percentage coverage of 5G or equivalent digital technology<sup>101</sup>, in line with the Connecting Bristol Strategy<sup>102</sup>.</li> <li>• Business-related scope 1, 2 and 3 emissions, above those identified in the in the Bristol Climate Strategy<sup>103</sup>.</li> </ul> |  |
| 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? |   |  |  |
| 9. Ensure access to a range of   | Would development or policy enhance and diversify the vitality and viability of local / retail centres?   | <ul style="list-style-type: none"> <li>• Level of retail floorspace granted permission or prior approvals.</li> </ul>  |  |

<sup>98</sup> See Appendix 5 for further guidance [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>99</sup> <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>

<sup>100</sup> <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>

<sup>101</sup> Using Open Data such as <https://www.nperf.com/en/map/5g>

<sup>102</sup> [https://www.connectingbristol.org/wp-content/uploads/2019/11/Connecting\\_Bristol\\_300819\\_WEB.pdf](https://www.connectingbristol.org/wp-content/uploads/2019/11/Connecting_Bristol_300819_WEB.pdf)

<sup>103</sup> <https://www.bristolonecity.com/wp-content/uploads/2020/02/placeholder-climate-strategy.pdf>

| SEA Theme   | SA Framework Objective  | Decision-making criteria  | Potential Key Monitoring Indicators <sup>98</sup>   |
|---|---|---|---|
|   | shopping facilities for all sections of society   | Would development be, or policy ensure, development is within easy walking distance of retail services?   | <ul style="list-style-type: none"> <li>Percentage of vacancy rates within centres.</li> <li>Amount of floorspace of different retail uses (completions and commitments) within centres.</li> <li>Percentage of population within 800m of centres</li> </ul>   |
| 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"> <li>Number of heritage assets classified as 'at risk' on the Local Register.</li> </ul>  |
|   | 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"> <li>Extent and condition of SSSIs, from Natural England Sites of Special Scientific Interest Units (England) data.</li> <li>Biological condition and integrity of SNCIs and LNRs (BCC PGSS).</li> <li>Percentage of the city protected for wildlife.</li> </ul>          |
|   |   | Would development or policy enable a net gain in biodiversity?  | <ul style="list-style-type: none"> <li>Area of habitat delivered through biodiversity net gain contributions (future monitoring consideration).</li> </ul>  |
|   | 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 maximise the opportunity to provide multifunctional green infrastructure?   | No specific indicators identified.  |
| Transport and Movement  | 13. To encourage a demonstrable modal shift and reduce the need to travel?  | 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.  |
|   |   | Would development or policy offer an opportunity to support the delivery of new transport and digital infrastructure?   | <ul style="list-style-type: none"> <li>Percentage coverage of 5G or equivalent digital technology<sup>104</sup>, in line with the Connecting Bristol Strategy<sup>105</sup>.</li> </ul>   |
|   | 14. To maintain and improve the existing highway network  | 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"> <li>Percentage of households with a car based on ONS Census data.</li> <li>Percentage of residents who view traffic congestion to affect quality of life, based on the Bristol Quality of Life Survey<sup>106</sup>.</li> </ul>  |
| Climate, Energy and Waste   | 15. To reduce the risk of flooding from all sources   | 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"> <li>Number of units / floorspace proposed and delivered on Flood Risk Zones 2, 3a and 3b.</li> <li>Number of properties at risk from flooding events, using data from Environment Agency mapping.</li> </ul>   |
|   |   | Would development or policy support sustainable and resilient flood risk management?  | <ul style="list-style-type: none"> <li>Number of households and businesses protected strategic flood risk infrastructure.</li> </ul>  |
|   | 16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled  | Would development or policy have a beneficial effect on water resources?  | <ul style="list-style-type: none"> <li>Per capita water consumption, based on Bristol Water data<sup>107</sup>.</li> </ul>  |
|   |   | 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"> <li>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.</li> </ul>                                     |
|   |   | 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"> <li>Annual city-wide domestic / non-domestic recycling (tonnes).</li> <li>Annual city-wide domestic / non-domestic non-hazardous landfill waste (tonnes).</li> <li>Annual city-wide domestic / non-domestic inert landfill waste (tonnes).</li> </ul>                    |
|   | 17. Minimise air and noise pollution  | Would development or policy maximise opportunities to support sustainable urban food production?  | <ul style="list-style-type: none"> <li>Number of allotment plots and hectares of Grade 3 Agricultural land used for growing purposes.</li> </ul>  |
|   |   | Would development minimise exposure to pollution or offer opportunity to reduce pollutions?   | <ul style="list-style-type: none"> <li>Percentage of population at risk of exposure to poor air quality (i.e. located within an AQMA or cumulative impact zone).</li> </ul>   |
|   | 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"> <li>City-wide direct energy use, transport and waste management emissions (ktCO2e), above those identified in the Bristol Climate Strategy<sup>108</sup>.</li> <li>Average energy efficiency of housing stock (using EPC data from BRE Survey<sup>109</sup>).</li> </ul> |
|   |   | 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"> <li>Annual GWh renewable energy generated in Plan area.</li> </ul>   |
|   |   | 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"> <li>Installed capacity of renewable energy generating development within Plan area.</li> </ul>   |
| Would development or policy increase resilience to the effects of climate change? |   | <ul style="list-style-type: none"> <li>Coverage of Heat Priority Areas (km) and numbers of properties served.</li> </ul>  |   |
|   |   |   | <ul style="list-style-type: none"> <li>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.</li> </ul>  |

<sup>104</sup> Using Open Data such as <https://www.nperf.com/en/map/5g>

<sup>105</sup> [https://www.connectingbristol.org/wp-content/uploads/2019/11/Connecting\\_Bristol\\_300819\\_WEB.pdf](https://www.connectingbristol.org/wp-content/uploads/2019/11/Connecting_Bristol_300819_WEB.pdf)

<sup>106</sup> <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>

<sup>107</sup> 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](https://f.hubspotusercontent30.net/hubfs/7850638/Site%20Assets/Offline%20docs/BW_Strategy-document_digital-version_1.1-2.pdf)

<sup>108</sup> <https://www.bristolonecity.com/wp-content/uploads/2020/02/placeholder-climate-strategy.pdf>

<sup>109</sup> <https://www.bristol.gov.uk/documents/20182/2870395/Bristol+Intergrated+Housing+Stock+Modelling+Database+Report.pdf/422e4bd6-56d1-ff8b-640c-6a0f6698873e>

