

## Appendix 1.2: March 2020 Baseline Update

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# 1. March 2020 Baseline Update

## 1.1 Introduction

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** of the Interim SA).

Using both the analysis of baseline data, in combination with the evaluation of relevant plans and programmes, the Scoping Report 2018 set out the SA Framework to be used to assess the effects of the Local Plan Review. The draft SA Scoping Report was issued for consultation in March 2017, with matters raised by consultees informing the final version. Subsequently, BCC published the Scoping Report alongside 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 for the Interim SA; and that no substantial changes in the policy or baseline context have since occurred that would justify a requirement to amend the SA Framework.

This March 2020 Baseline Update therefore comprises a review of the sustainability and policy baseline, alongside the SA Framework. While this review was undertaken predominantly in March 2020, it was also updated periodically where new information was encountered through policy and site assessment stages of the Interim SA. It is structured as follows:

- **Section 1.2** sets out the methodology employed for this Baseline Update;
- **Section 2** presents the detailed review findings for both the policy context and the environmental baseline;
- **Section 3** contains the Sustainability Appraisal Framework Update and the rationale for proposed changes to the SA Framework;
- **Section 4** summarises the ‘current situation’ in terms of the Plan area sustainability context, and contains a review of the ‘likely future without the Local Plan’; and
- **Section 5** concludes the findings of this Baseline Update and recommendations for the final SA.

## 1.2 Methodology for Stage A1-A4 Review

This Baseline Update sets out in detail the approach taken to updating the Scoping Report and SA Framework, led by the iterative steps set out in Planning Practice Guidance<sup>1</sup> for the SA process:

- **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/SEA Framework.

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<sup>1</sup> Paragraph: 013 Reference ID: 11-013-20140306

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>2</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:

- **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>3</sup> and the SEA Directive Regulations. Where these were identified, changes to the SA Framework (either objectives or decision-making criteria) were proposed. A summary of proposed changes to the SA Framework, including the underpinning justification for these changes is set out in Table 1 in Section 3. Following refinement of the SA Framework, and the information reviewed

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

<sup>3</sup> Informed by “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005) and RTP1 Guidance: STRATEGIC ENVIRONMENTAL ASSESSMENT Improving the effectiveness and efficiency of SEA/SA for land use plans.

through the baseline update, the 'current situation' and the 'likely future without the plan' are summarised together against the SEA topics in Table 1Table 2.

## 2. Detailed Review Findings

### 2.1 Overview

The following section reviews the consultation responses received to the March 2019 Local Plan Review consultation, changes to the relevant plans, programmes and policy and baseline review.

### 2.2 Consultation Responses to the March 2019 Local Plan Review Consultation

Relevant consultation bodies (Natural England, Historic England and the Environment Agency) provided consultee comments as part of BCC's recent Local Plan Review, held between March – May 2019.

Consultation responses were made in relation to the Draft Local Plan, to include Draft Site Allocations and the New Protection of Open Space Paper. While not directed at the Sustainability Appraisal of the Local Plan itself, it is noted that comments provided are relevant to the development of the Local Plan including its spatial strategy. Key sustainability issues and implications for the Local Plan are presented with subsequent recommended revisions for the SA Framework.

#### 2.2.1 Natural England

##### Key issues and implications for the Local Plan

The main issues that derive from the Natural England response to the Local Plan are to:

- Update existing Green Infrastructure policies in line with local and national policy and strategies (as outlined within the updated NPPF and 25-Year Environment Plan);
- Account for biodiversity net gain, with an aim to achieve a coordinated policy with adjacent authorities;
- Account for the impacts of urban intensification on existing green spaces and GI, and consider enhancement of these via new spaces, better connectivity and integrated design;
- Recognise the value of urban wildlife and its dependent ecological networks including on brownfield sites;
- Undertake an HRA for the Local Plan, to inform any Local Plan mitigation measures;
- Consider the importance of a diverse and resilient GI network to inform plan development;
- Consider more specific Green Infrastructure measures in the Development Strategy and policies; and
- Recognise the importance of the Avonmouth Industrial Area and Bristol Port, including Hallen Marsh.

##### Recommended revisions to the SA Framework

Noting the comments received from Natural England, consideration has been given to how these can best be accommodated within the SA Framework to ensure that any key sustainability issues are considered in the appraisal and further development of Local Plan policy. Proposed changes to the framework in response to these comments are outlined below.

**11. To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats:** To address policy for biodiversity net gain, it is proposed that

the decision-making criteria are supplemented as follows: “Would policy or development contribute to a net gain in biodiversity and a recovery of habitats?”

**12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation:** To address the need for resilience GI networks, it is proposed that the decision-making criteria are supplemented as follows: “Would policy or development maximise the opportunity to provide multifunctional green infrastructure (e.g. climate resilience, recreation, flood management etc) and maximise ecosystem services?”

### 2.2.2 Environment Agency

#### Key issues and implications for the Local Plan

The main issues that derive from the Environment Agency response to the Local Plan are:

- Subject policy and development within current or future Flood Zones 2 and 3 to Sequential and Exceptional Tests;
- Prevent development which would increase flood risk elsewhere;
- Account for tidal and fluvial flood risk, including climate change scenarios;
- Consider Green Infrastructure links as part of ‘green’ flood defence improvements;
- Address flood risk in a strategic manner when assessing and developing the Plan;
- Consider opportunities to open up the city’s rivers (including the Malago and River Frome) to improve amenity and deliver biodiversity net gain; and,
- Consider principles of sustainable design and construction within current and future development to ensure resilience to flood risk, accounting for impacts of climate change.

#### Recommended revisions to the SA Framework

Again, consideration has been given to how these can best be accommodated within the SA Framework to ensure that any key issues are considered in the appraisal and further development of Local Plan policy. Whilst several of these key sustainability issues are covered within existing decision-making criteria, proposed changes to the framework in response to these comments are outlined below.

**12. To ensure the protection and enhancement of green and blue infrastructure and ensure access to a variety of open space and recreation:** To address the importance of GI including for flood resilience and recreational amenity, it is proposed that the decision-making criteria are supplemented as follows: “*Would policy or development maximise the opportunity to provide multifunctional green infrastructure (e.g. climate resilience, recreation, flood management etc) and maximise ecosystem services?*”

**15. To reduce the risk of flooding from all sources:** To address the need to address flood risk within the Plan’s Development Strategy in a strategic manner and in response to climate change scenarios, it is proposed that the decision-making criteria are supplemented as follows: “*Would policy or development offer opportunities to significantly reduce flood risk both on the site and by contributing to a coordinated response to flood risk and climate change at a strategic level?*”

### 2.2.3 Historic England

#### Key issues and implications for the Local Plan

The main issues that derive from the Historic England response to the Local Plan are:

- Prepare a robust and updated historic environment evidence base (including a Heritage Topic Paper), to inform the Plan's positive approach to conservation of the historic environment;
- Undertake specific heritage impact assessments within the context of a historic environment characterisation;
- Support the delivery of developing heritage assets to viable uses, including heritage assets at risk;
- Recognise the historic significance of Cumberland Basin (Western Harbour) in assumptions made for the Growth and Regeneration Area.

#### Recommended revisions to the SA Framework

Noting the comments received from Historic England, consideration has been given to how these can best be accommodated within the SA Framework. Proposed changes to the framework in response to these comments are outlined below.

**10. To ensure the protection and enhancement of the historic environment and its setting:**

To address the need to apply a positive approach to the conservation and enhancement of the historic environment, it is proposed that the decision-making criteria are supplemented as follows: *“Would the policy or development promote high quality urban design, taking into consideration the character, key views and topography of the existing townscape?”*

## 2.3 Relevant Plans, Programmes and Policy Review

This section of the Baseline Update summarises the review of other relevant plans, programmes and policy documents that have emerged since the scoping stage in 2018. The purpose of this is to identify the objectives contained within these documents and understand the implications of these for the Local Plan and Interim SA.

### 2.3.1 International Policy and Strategies

The Paris Agreement is an agreement within the United Nations Framework Convention on Climate Change (UNFCCC), dealing with greenhouse-gas-emissions mitigation, adaptation, and finance. It was made effective 4 November 2016. The long-term goal is to keep the increase in global average temperature to well below 2°C above pre-industrial levels; and to pursue efforts to limit the increase to 1.5°C, recognizing that this would substantially reduce the risks and impacts of climate change.

A recent Court of Appeal decision ruled that plans to build a third runway at Heathrow are illegal because these plans fail to take into account the UK's commitment to cutting carbon emissions under the Paris Agreement. The decision ruled that the Paris Agreement ought to have been taken into account by the Secretary of State and an explanation given as to how it was taken into account, but it was not (paragraph 283 of the Judicial Review)<sup>4</sup>.

### 2.3.2 National Plans, Frameworks and Strategies

#### **National Planning Policy Framework (as amended)**

**Relationship with Bristol Local Plan:** The revised National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied within the planning system, including development of Local Plans and development management. The NPPF (first published 2012) was revised on 24 July 2018 and last updated on 19 June 2019.

**Relevant objectives for Bristol Local Plan:** As the SA Scoping Report 2018 referred to policies within the NPPF (2012), broad changes to the Framework from the 2019 are summarised as:

- **Presumption in favour of sustainable development:** The Framework is based on a presumption in favour of sustainable development. This means that plans should positively seek opportunities to provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>5</sup>. This is unless the provisions of paragraph 116 indicate otherwise, or the adverse impact of doing so would significantly and demonstrably outweigh the benefits.
- **The Standard Method and Housing Delivery Test:** Paragraph 60 establishes a standard methodology for determining local housing need. Strategic policies to increase the housing

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<sup>4</sup> [R (FRIENDS OF THE EARTH) v SECRETARY OF STATE FOR TRANSPORT AND OTHERS]

<sup>5</sup> As established through statements of common ground (see NPPF paragraph 27).

<sup>6</sup> The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.

supply must be informed by this assessment<sup>7</sup>, and where housing delivery falls below this target the Local Planning Authority should assess causes of under-delivery within an action plan.

- **Efficient use of land:** The draft revised NPPF sets out how Local Planning Authorities should use minimum density standards for city and town centres to maximise the efficient use of land. The approach to achieving ‘appropriate densities’ are provided in paragraph 122.
- **Small and medium sized sites:** The revised NPPF mandates Local Planning Authorities to accommodate at least 10% of their housing requirement on ‘small and medium sized sites’ (up to one hectare) through development plans and brownfield land registers.
- **Biodiversity net gain:** The revised NPPF (2019) sets a new approach to safeguarding existing assets and requiring net gains for biodiversity. The NPPF requires development plans to establish ‘coherent ecological networks that are more resilient to current and future pressures’<sup>8</sup> and ‘identify and pursue opportunities for securing measurable net gains for biodiversity’<sup>9</sup>. The plan must also ‘demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains)’<sup>10</sup>. One of the principles of the NPPF 2019 is that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are “wholly exceptional reasons”<sup>11</sup>.
- **Green Belt policy:** Although the general emphasis of the openness and permanence of the Green Belt is retained within the NPPF, the 2019 revised version seeks to further justify the definition of ‘exceptional circumstances’. These will be assessed against whether the strategy makes as much use of suitable brownfield sites and underutilised land, optimises the density of development and has been informed by discussions with neighbouring authorities.

#### **Potential SA Framework Recommendations – Objectives and Decision-making criteria:**

- **Objective 1** decision-making criteria is recommended to be retained as it requires Local Planning Authorities to have a 5-year housing supply that meets the objectively assessed need for Bristol.
- It is recommended that an additional decision-making criterion be inserted for **Objective 2** decision-making criteria, to include: “Would development or policy provide an opportunity for a higher density within a sustainable location?”. This will align with the requirement for there to be a significant uplift in density when seeking to understand whether exceptional circumstances exist for the amending the Green Belt boundary. A further refinement is therefore made to include the retention of ‘openness and permanence’ of Green Belt land against the Objective 2, and where Green Belt release is justified, further work will be needed to consider the ability to offset impact through compensatory improvements to the environmental quality and accessibility.
- **Objective 11 and Objective 12** decision-making criteria should be refined to require a ‘net gain in biodiversity’ and to ‘maximise opportunities to provide multifunctional green infrastructure’.

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<sup>7</sup> Paragraph 60 of the NPPF (2019): ‘unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.’

<sup>8</sup> Paragraph 170 of the NPPF.

<sup>9</sup> Paragraph 174 of the NPPF.

<sup>10</sup> Paragraph 32 of the NPPF.

<sup>11</sup> Paragraph 175 of the NPPF.



## National Planning Policy Guidance – relevant revisions post-2018

**Relationship with Bristol Local Plan:** The National Planning Practice Guidance (PPG) supplements the objectives of the NPPF and provides further detail for the implementation of policy and development management within the planning system. It was first published in 2016 and is refreshed by the Government regularly. This assessment focusses on the changes within the NPPG since the publication of the Scoping Report 2018.

### **Relevant objectives for Bristol Local Plan:**

- **Housing supply and delivery:** Guidance on the assessment of housing need, the housing delivery test and 5 year housing land supply was updated in July 2019. Reflecting the requirements of the NPPF, this aims to ensure that there is a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against the requirement<sup>12</sup>.
- **Air quality:** Revised guidance<sup>13</sup> sets out the role of Local Plans to account for air quality management areas, Clean Air Zones and other areas, including sensitive habitats or designated sites of importance for biodiversity.
- **Climate change:** Updated PPG sets out that LPAs 'can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes'. LPAs are not restricted in 'setting energy performance standards above the building regulations for non-housing developments'<sup>14</sup>.
- **Effective use of land:** Updated PPG<sup>15</sup> sets out new requirements for higher density development and considerations when establishing 'appropriate densities'. These include accessibility measures; characterisation studies and design strategies, environmental and infrastructure assessments and market assessments/viability.
- **Green Belt:** Guidance<sup>16</sup> provides guidance on requirements for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land where exceptional circumstances have been demonstrated<sup>17</sup>.
- **Healthy and safe communities:** In relation to healthy food environments, planning policies<sup>18</sup> can seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate. Updated PPG<sup>19</sup> also includes an amended definition of what constitutes a 'healthy place'<sup>20</sup>, which is supported by the National Design Guide and new guidance in relation to estate regeneration.

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<sup>12</sup> Paragraph 001 to Paragraph 053 – Reference ID: 68-001/053-20190722

<sup>13</sup> Paragraph: 002 Reference ID: 32-002-20191101

<sup>14</sup> Paragraph: 012 Reference ID: 6-012-20190315

<sup>15</sup> Paragraph: 004 Reference ID: 66-004-20190722

<sup>16</sup> Paragraph: 001 Reference ID: 64-001-20190722

<sup>17</sup> Paragraph: 002 Reference ID: 64-002-20190722

<sup>18</sup> Paragraph: 004 Reference ID:53-004-20190722

<sup>19</sup> Paragraph: 003 Reference ID:53-003-20191101

<sup>20</sup> A healthy place is 'one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing' (Paragraph: 003 Reference ID:53-003-20191101).

- **Historic Environment:** In line with the NPPF (paragraph 185), updated PPG states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment.
- **Water supply, wastewater and water quality:** In relation to plan-making, updated PPG sets out the broad considerations relevant to water supply and quality being infrastructure, wastewater, water quality and, cross-boundary concerns. It further states that ‘strategic policy-making authorities will also need to consider the objectives in the Government’s 25 Year Environment Plan to reduce the damaging abstraction of water from rivers and groundwater, and to reach or exceed objectives for specially protected water bodies’<sup>21</sup>.

#### **Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

- **Objective 2** decision-making criteria are recommended to include a question that specifically addresses the release and development of Green Belt land.
- **Objective 6** decision-making criteria are recommended to test draft Local Plan policies for their ability to promote healthy lifestyles, including: ‘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?’
- **Objective 16** decision-making criteria are recommended to include a requirement that would ensure a reduction in damaging abstraction of water from rivers and groundwater within the Plan area<sup>22</sup>.
- **Objective 17** decision-making criteria to consider reference to be made to sensitive habitats or designated sites of importance for biodiversity as necessary.
- **Objective 18** decision-making criteria should consider specific reference to addressing the sustainability standards for buildings to meet carbon reduction targets.

#### **National Design Guide**

**Relationship with Bristol Local Plan:** The Guide forms part of the Government’s collection of national planning policy and should be read alongside the PPG on design process and tools. It provides greater clarity on the definition of ‘good design’ by setting out high-level principles of design and encouraging the use of Local Design Guides which focus on specific place contexts.

**Relevant objectives for Bristol Local Plan:** The ten characteristics of ‘good design’ are set out within the Guide as those used to create physical character, sustain a sense of community and work to address climate change. A number of these are relevant for both strategic planning and plan-making within the context of the Local Plan, including: identity; ensuring walkable neighbourhoods through well-designed built form and spaces that promote movement; and, ensuring integration of nature with a multifunctional network. Other relevant examples include promoting well-being and inclusion

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<sup>21</sup> Paragraph: 002 Reference ID: 34-002-20140306.

<sup>22</sup> Improving at least three quarters of the UK’s to be close to their natural state as soon as is practicable by: reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies; reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, as per River Basin Management Plans; and minimising water lost through leakage, with water companies expected to reduce leakage by at least an average of 15% by 2025.

in public spaces; supporting a mix of uses and different delivery models for new homes; ensuring well-designed places which respond to climate resilience and places which are planned to be adaptable to technology, ownership patterns and working practices.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

- **Objective 1** decision-making criteria could be revised to address the extent of support for community-led housing/alternative tenure models.
- **Objective 12** decision-making criteria could consider the extent to which development / draft policies protect and enhance green infrastructure which supports climate resilience (i.e. multifunctional green infrastructure).
- **Objective 13** decision-making criteria could further consider the extent to which development/draft policies support sustainable transport.

**Planning for the Future: Preliminary Planning White Paper 2020**

**Relationship with Bristol Local Plan:** ‘Planning for the Future’ is a preliminary paper published by MHCLG alongside the 2020 Budget. Alongside the Planning White Paper, the Government will also produce a Building Safety Bill, a Renters’ Reform Bill and a Social Housing White Paper. These together will form the foundation for a new MHCLG Housing Strategy expected later in the year.

**Relevant objectives for Bristol Local Plan:** Key sections of the paper relevant to the Local Plan include objectives to:

- Increase the delivery of homes, including support for ‘brownfield development and densification’.
- Create ‘beautiful, sustainable places’, by accounting for the recommendations of the Building Better, Building Beautiful Commission and by endorsing the use of the National Model Design Code to set out parameters of good design.
- Develop more sustainable places by reviewing NPPF policies for development in areas of flood risk and through the introduction of a new Future Homes Standard, requiring up to 80% lower carbon emissions for all new homes from 2025.
- Ensure affordable, safe and secure housing for all, where the 2020 Budget includes a £12 billion investment in affordable housing over five years.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

Given the above Government objectives, and the imminent publication of the paper, the SA Framework **Objective 18** could be strengthened. It is considered that the emphasis on affordable housing and brownfield development and densification are captured in framework **Objective 1** and **Objective 2**.

**A Green Future: Our 25 Year Plan to Improve the Environment**

**Relationship with Bristol Local Plan:** Whilst it may not currently have a legal bearing on the direction of the Local Plan, emphasis is placed on putting the environment at the heart of planning and development. The plan sets out ‘biodiversity net gain’ as being current government policy for development including housing and infrastructure, which will be mandated through the emerging

Environment Bill. There is also an ambition to embed broader ‘environmental net gain’ applied through a natural capital approach to development in the future.

**Relevant objectives for Bristol Local Plan:** Assuming the Environment Bill, which is currently proceeding through parliamentary process, is given royal assent then biodiversity net gain will become a legal requirement for development. Central Government are subsequently planning to strengthen this requirement for planning authorities, to extend it to ensure environmental net gains (addressing broader environmental services beyond just biodiversity).

Other national objectives and targets within the 25-Year Environment Plan and relevant to the Local Plan include:

- Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies;
- Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water (as per River Basin Management Plans);
- Ensuring that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing;
- Ambition of zero avoidable waste by 2050;
- Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases; and
- Ensuring that all policies, programmes and investment decisions take into account the possible extent of climate change this century.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** It is recommended to embed biodiversity net gain principles within the SA Framework.

#### **Air Quality Plan for Nitrogen Dioxide (NO<sub>2</sub>) in the UK (2017)**

**Relationship with Bristol Local Plan:** This comprises the UK plan for tackling roadside nitrogen dioxide concentrations. It precedes the development of the Clean Air Strategy.

**Relevant objectives for Bristol Local Plan:** The Plan includes a clear ambition to improve air quality, backed up with significant national investment (£2.7 billion overall in air quality and cleaner transport). The Plan sets out the UK’s adopted and legally-binding targets to reduce significantly overall emissions of NO<sub>x</sub> and other damaging air pollutants.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** **Objective 17** should consider how development or policy contributes to meeting national air quality targets.

#### **Clear Air Strategy 2019**

**Relationship with Bristol Local Plan:** The Clean Air Strategy sets out the comprehensive action that is required from across all parts of government and society to meet revised reduction targets (as

introduced by the Air Quality Plan). The Strategy is complementary to three other UK Government strategies, the: Industrial Strategy, Clean Growth Strategy, and the 25 Year Environment Plan.

**Relevant objectives for Bristol Local Plan:** The Government will bring forward provisions on air quality. This will include an up to date legislative framework for tackling air pollution at national and local level, tying this into the development of the new environmental principles and governance framework to be outlined in the Environment Bill.

The Strategy outlines that:

- Future electricity, heat and industrial policies seek together to improve air quality and tackle climate change, by phasing out coal-fired power stations, improving energy efficiency, and shifting to cleaner power sources.
- The UK has set more stringent targets to cut emissions by 2020 and 2030, to reduce PM2.5 concentrations across the UK, so that the number of people living in locations above the WHO guideline level of 10 µg/m<sup>3</sup> is reduced by 50% by 2025.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** **Objective 17** decision-making criteria should consider how draft policies and development options / strategies are assessed for their support towards meeting legal air quality targets.

### **Transport Decarbonisation Plan**

**Relationship with Bristol Local Plan:** The national Transport Decarbonisation Plan (TDP) is currently being developed by the Government<sup>23</sup>. It is recommended that the next iteration of the SA Report, including the SA Framework, accounts for relevant and mandatory targets arising from the TDP.

### **High Streets and Town Centres in 2030**

**Relationship with Bristol Local Plan:** The High Streets and Town Centres study sets out the impact that online shopping is having on high-streets.

**Relevant objectives for Bristol Local Plan:** Using the Future High Streets Fund and Towns Fund, the objectives are for high streets and town centres to be places for activity-based community gatherings and where green space, leisure arts and culture can be combined.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** Whilst vitality and viability of retail centres is referenced, there is limited reference to the changing nature of high streets which is likely to be particularly prevalent post-COVID-19. It is therefore recommended that the decision-making criteria is revised to state: *‘Would development or policy enhance and diversify the vitality and viability of local / retail centres?’*.

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<sup>23</sup> DfT (2020). Decarbonising Transport: Setting the Challenge.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/878642/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878642/decarbonising-transport-setting-the-challenge.pdf)

### 2.3.3 Regional Plans and Strategies

#### **West of England Industrial Strategy 2019**

**Relationship with Bristol Local Plan:** The Local Industrial Strategy (LIS) sets out the objectives and priorities for growth of different industries within the West of England region. It therefore has some influence on the Local Plan through setting policy ambitions for strategic economic development within and adjacent to BCC's local authority area.

**Relevant objectives for Bristol Local Plan:** The Strategy outlines the region's proposals to establish a 'Global Centre of Innovation Excellence' to raise the profile of the West of England as a leader in research and development. Objectives within the Strategy include:

- Shifting to 'clean growth';
- Ensuring communities are connected to jobs, training and services in a sustainable and low carbon way addressing air quality and improving health;
- Supporting businesses to drive productivity through adopting new clean technology and energy efficiency measures;
- Investing in infrastructure that reduces energy demand and carbon emissions whilst being resilient to the impacts of climate change;
- Encouraging greater access to economic opportunity; and,
- Ensuring inclusive growth, with a focus on opportunities for employment and progression.

The Industrial Strategy also sets out the West of England's three distinct and overlapping 'sector strengths'. These include advanced engineering; aerospace; creative, cultural and digital industries; and financial, business and legal 'tech' services. The plan seeks to build on these strengths.

#### **Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

One additional decision-making criteria could consider the ability of policies or developments to support priority sectors: '*Would policy or development support opportunities for growth (i.e. land allocations, supporting infrastructure etc.) in priority sectors*'. Additional decision-making criteria for **Objective 8** could be included in relation to energy efficiency and carbon neutrality.

#### **Joint Local Transport Plan 4 (2020)**

**Relationship with Bristol Local Plan:** The West of England Joint Local Transport Plan 4 (JLTP4), adopted in March 2020, will operate alongside the new Local Plan to deliver linked objectives for transport up to 2036 and beyond.

**Relevant objectives for Bristol Local Plan:** The Plan outlines that transport linked CO2 emissions will rise by a further 22% across the West of England by 2036 if action is not taken to address these at a regional and local level. The JLTP4 sets out how the region will develop transport and address regional priorities to reduce energy demands, lower carbon emissions and respond to the climate emergency. Central the Local Industrial Strategy and the JLTP4 are the objectives of clean and inclusive growth.

Key objectives of the JLTP4 include:

- Aiming for transport to be carbon neutral by 2030;
- Encouraging a modal shift away from cars, by providing transformational alternatives such as a new mass transit network and other demand management measures such as congestion charging; and
- Ensuring public spaces are ‘greener, cleaner, people focused places’ that are no longer dominated by vehicles.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

No additional recommendations are proposed for Objectives 13 and 14.

**Local Cycling and Walking Infrastructure Plan (2020)**

**Relationship with Bristol Local Plan:** The West of England Local Cycling and Walking Infrastructure Plan (LCWIP) sets out the sub-regional policy context (informed by the West of England Joint Local Transport Plan 4 – JLTP4) for the strategic development of cycling and walking infrastructure. The plan was subject to consultation in early 2020, and once adopted will be additional to individual local authorities’ active travel strategies and plans.

**Relevant objectives for Bristol Local Plan:** The plan identifies walking and cycling routes which have been prioritised for future investment. Objectives of the plan are intended to support the JLTP4, including: enabling equality and improving accessibility; contributing to better health, wellbeing, safety and security; taking action against climate change and addressing poor air quality; supporting sustainable and inclusive growth; and creating better places. The LCWIP seeks to deliver improvement to the quality of streets and public spaces; and provide a strategic cycling network.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

Under **Objective 13**, a decision-making criterion could be included as follows: *‘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?’*

**Wessex Water Resources Management Plan (2019)**

**Relationship with Bristol Local Plan:** The Water Resources Management Plan (WRMP) sets out measures to meet demand for water over the next 25 years; and is a refresh from the 2014 version. The plan was consulted with stakeholders between March – June 2018 and published as final in July 2019.

**Relevant objectives for Bristol Local Plan:** The Plan includes proposals to reduce leakage by 15% by 2025, and support reductions in consumption of water through metering and water efficiency programmes. Priorities also include abstracting less water from the environment, improving the resilience of water services, and supporting areas of the country where water stress is a growing problem.

**SA Framework Recommendations – Objectives and Objective Decision-making criteria:** Framework **Objectives 15** and **Objectives 16** capture water management principles and objectives of the WRMP.

### *2.3.4 Local Plans, Strategies and Development Frameworks*

#### **Bristol One City Climate Strategy**

**Relationship with Bristol Local Plan:** The Bristol One City Climate Strategy represents a shared vision for managing, mitigating and adapting to climate change in Bristol by 2030. It does not form a statutory part of the adopted Bristol Local Plan.

The Strategy was developed by the One City Environmental Sustainability Board, which is co-chaired by the Mayor of Bristol and which BCC are members of. Therefore, where the strategy identifies issues and objectives that can be wholly or partially addressed through the planning system, then the Local Plan could consider how it can best contribute to achieving these objectives.

The strategy commits Bristol to becoming carbon neutral and climate resilient by 2030. In doing so, it identifies the need to embed the delivery of carbon neutral and climate resilient standards in new development, including adequate energy efficiency standards, provision of Green Infrastructure and renewables.

**Relevant objectives for Bristol Local Plan:** The actions needed to achieve the target of becoming carbon neutral and climate resilient by 2030 are set out within 10 key areas and include a number of issues that are within the remit of the Local Plan to address, which are as follows:

- Transport: active travel and zero carbon public transport modes; converting the remaining vehicles to zero carbon fuels; transforming freight, aviation and shipping.
- Buildings: retrofitting and building them to become carbon neutral and resilient to a changing climate.
- Heat decarbonisation: energy infrastructure that will implement a carbon neutral energy method for heating and hot water. To be supported by City Leap Energy Partnership.
- Electricity: smart and flexible to (to support electricity decarbonisation nationally), maximise local renewable energy generation and increase system resilience.
- Consumption and waste: responsible consumption of both goods and services; zero carbon from waste management.
- Business and the economy: advocates movement of businesses to carbon neutrality/climate resilience. Inclusive employment opportunities within this area.
- Public, voluntary, community and social enterprise services: endorsing carbon neutrality in these services. Supply chains that are also prepared for future climate conditions and hazards.
- Natural environment: restoring, protecting and enhancing these spaces and wildlife within them as the climate continues to change.
- Food: resilient supply chain, locally and sustainably produced food.
- Infrastructure interdependencies: collaboration in water, transport, waste, ICT and energy systems. Embed carbon neutrality across these systems.

#### **Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

**Objective 8** decision-making criteria could be revised to consider carbon neutrality within development of employment land / within the employment strategy. **Objective 11** decision-making criteria could be rephrased to ensure positive enhancement of geological and biological assets, for

example: *‘Would development or policy protect biological, geological and nationally or internationally designated nature conservation assets from adverse effects?’*

Decision-making criteria for **Objective 13** could consider low emission and zero carbon within transport / support for sustainable transport technologies (e.g. smart charging for EVs).

The Strategy includes reference to the need for new city flood defence infrastructure. This may include grey infrastructure and implementation of natural solutions, to support flood protection while providing urban cooling, environmental and health and wellbeing benefits. This could be considered within **Objective 15**.

**Objective 16** could include a decision-making criterion that responds to waste and resource consumption.

To maximise the potential for energy efficiency, reduce greenhouse gas emissions in Bristol to zero by 2030 and ensure that the built and natural environment and its communities can withstand the effects of climate change, additional decision-making criteria should be considered for **Objective 18**.

### **Bristol City Council Corporate Strategy (2018-2023)**

**Relationship with Bristol Local Plan:** The Strategy sets out BCC’s commitment to the One City Plan 2020 and, through the wider BCC Business Plan objectives, it informs development of the Local Plan.

**Relevant objectives for Bristol Local Plan:** The Strategy includes delivery of 2,000 new homes every year by 2020 – 800 of which meet the planning definition of ‘affordable’ (social rent, affordable for rent or shared ownership). Key objectives include: embedding health in all policies to improve physical and mental health and wellbeing; reduce inequalities and the demand for acute services; improve the environment to ensure people enjoy cleaner air, cleaner streets and access to parks and green spaces.

### **Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

- **Objective 1** decision-making criteria could be revised to include a question that specifically addresses the extent to which draft policies will support the delivery of adequate affordable housing, as follows: *‘Would the development or policy ensure an adequate contribution to affordable housing?’*
- **Objectives 3 and 4** could include a requirement that specifically tests draft policies / development options for their ability to support inclusive community facilities and services development, as follows: *‘Would development be within, or would policy ensure development is within, easy walking distance of key services (e.g. GP, post office, community centre)?’*

### **Bristol City Council Clean Air Plan**

**Relationship with Bristol Local Plan:** The Report outlines the approach that BCC intends to take to meet the legal compliance for NOx limits within the city before March 2021. This follows a formal

direction from the Government in 2017 to achieve compliance with clean air directives<sup>24</sup>, alongside national plans to reduce roadside NOx concentrations<sup>25</sup>. The report was subject to public consultation July-August 2019<sup>26</sup>, ahead of an Outline Business Case (OBC) in November 2019<sup>27</sup>.

**Relevant objectives for Bristol Local Plan:** The report proposed two options designed to achieve compliance with legal NOx limits in line with legal obligations and 'tests'<sup>28</sup>, whilst mitigating the impact on vulnerable and low-income households. These are as follows: Clean Air Zone (private cars not charged) or a diesel car ban within a smaller central zone. Recommendations for the CAZ were approved for an OBC.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** Framework **Objective 17** could be further detailed to include targets, however these may be subject to change across the Plan Period.

### **Bristol Housing Strategy – More than a Roof 2016-2020**

**Relationship with Bristol Local Plan:** Although not forming part of the Local Plan, this strategy provides a framework for the delivery of the Mayor's vision for housing and was adopted by Full Council in December 2015. Once again, these objectives have helped inform the development of the Local Plan.

**Relevant objectives for Bristol Local Plan:** Key priorities identified within Strategy are as follows: *'provide well designed, quality homes that are affordable, sustainable and suitable for people's needs'*; and *'enabling access to housing'*, of which relevant actions include creating resilient households and preventing/responding to homelessness.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** Revisions are recommended to decision-making criteria for **Objectives 1 and 2** to reflect the Strategy's priorities for quality affordable and sustainable homes that are accessible for the city's identified needs.

### **Bristol Homelessness and Rough Sleeping Strategy 2019-24**

**Relationship with Bristol Local Plan:** Whilst the Strategy does not form part of the adopted Bristol Local Plan, it identifies a role for planning to address the lack of affordable housing within the city. It was developed following the enforcement of Homelessness Reduction Act 2017 (implemented April 2018) and the National Rough Sleeper Strategy 2018.

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<sup>24</sup> Under the Environment Act 1995.

<sup>25</sup> DEFRA (2017). UK Plan for tackling roadside NOx concentrations – detailed plan July 2017. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633270/air-quality-plan-](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-)

<sup>27</sup> <https://democracy.bristol.gov.uk/mgAi.aspx?ID=17389#mgDocuments>

<sup>28</sup> The three legal tests are as follows: achieve compliance with the legal NOx limits in the shortest period of time; reduce human exposure as quickly as possible; and ensure that compliance is not just possible but likely.

**Relevant objectives for Bristol Local Plan:** The Strategy outlines the need to focus maximum efforts to halve rough sleeping by 2022 and eradicate by 2027 (national target), developing a 'Housing First' approach for homeless people with the highest level of need. This has implications for overall housing need, supply and delivery within the Plan period.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** The Strategy outlines the need to halve rough sleeping by 2022 and eradicate by 2027 in line with the national target. **Objective 1** could therefore include a reference to development options which would contribute to tackling rough sleeping by providing sufficient housing to meet the needs of all communities in the City.

### **South Bristol Sustainable Urban Development Strategy 2018 – Draft Version**

**Relationship with Bristol Local Plan:** The Strategy does not form part of the adopted Bristol Local Plan, however it informs the approach to the development and socio-economic regeneration of the South Bristol Regeneration Area.

**Relevant objectives for Bristol Local Plan:** The SBSUD Strategy includes a vision to close the gap with disadvantaged communities, achieved by major developments in employment and Government-backed infrastructure improvements within South Bristol / North Somerset. Other objectives identified at a regional level include stimulation of low carbon industry growth and decarbonisation of the West of England economy; support for growth of research and innovation; and increasing growth capability of SMEs.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** **Objective 8** decision-making criteria could include a question that addresses the extent to which draft policies / development would support delivery of employment land for priority sectors (including low carbon, innovation and knowledge-based sectors).

To increase the availability of employment spaces for SMEs and/or Green Business Parks, it is proposed that the decision-making criteria are refined to include: *'Would policy or development provide a range of high quality employment spaces to meet the identified needs of all communities and all employers within the city?'*

### **Bristol Transport Strategy 2019**

**Relationship with Bristol Local Plan:** While the Strategy does not form part of the adopted Bristol Local Plan, it presents the vision for the city's transport up to 2036. The Local Plan can play a role in delivering the strategy by addressing issues including promotion of low carbon transport options, parking standards, EV charging provision etc.

**Relevant objectives for Bristol Local Plan:** The Strategy sets out the need for transport improvements to: accommodate increased demand from growth in housing, jobs and regeneration; develop an inclusive transport system; create healthy places and improving local air quality; make efficient use of streets; minimise negative impacts of congestion; and support sustainable growth by reducing carbon emissions and supporting cleaner movement of goods/services within network; prioritise sustainable transport; and use transport to support and enhance local centres and high

streets. Actions include delivery of strategic walking network (at regional level), adopting design standards for inclusive walking and developing 'walkable communities'.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** It is recommended that **Objective 13** decision-making criteria reflect ambitions to develop sustainable transport infrastructure.

**Objective 8** could also be refined to include reducing the need to travel for employment and to reflect a more flexible workforce. Proposed wording could now include: *'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?'*

### **Bristol Health and Well-being Strategy (2020-2025)**

**Relationship with Bristol Local Plan:** Strategy outlines BCC's approach to addressing health and wellbeing issues, and therefore it can inform how the Local Plan develops.

**Relevant objectives for Bristol Local Plan:** The vision of the Strategy includes support for positive mental and physical wellbeing of citizens; and to reduce health inequalities between the most and least economically deprived areas.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** **Objective 6** decision-making criteria should be revised to include a question that tests the development options /draft policies for their ability to support delivery of healthy lifestyles, including *'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?'*

### **Bristol One City Plan**

**Relationship with Bristol Local Plan:** The Plan outlines the city's key challenges, sets a vision for Bristol for 2050 and how city partners will collaborate to create a fair, healthy, and sustainable city. It can therefore inform how the Local Plan develops.

**Relevant objectives for Bristol Local Plan:** Key priorities include utilising emerging construction techniques; city-wide interventions to tackle homelessness; promoting 'connectivity' at community level including within digital and social infrastructure; and providing equitable access to fuel and energy. Reference is also made to tackling persistent unemployment and economic exclusion and inclusive access a 'healthy natural environment'.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

- Decision-making criteria for **Objective 5** or **8** could include a question that tests the development options /and draft policies for their ability to support delivery of digital connectivity to reduce inequality (see recommendations made following review of SBSUD Strategy 2018).
- **Objective 13** decision-making criteria could include support for the accommodation of new transport technologies (EVs etc).

- **Objective 16** include support for delivery of sustainable food production within the Plan area/period, suggested as follows: *‘Would development or policy maximise opportunities to support sustainable urban food production?’*
- **Objective 16** decision-making criteria could include a question that tests support in promoting zero-waste economies for example: *‘Would development or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production?’*

### **Bristol Housing Delivery Plan 2017-2020**

**Relationship with Bristol Local Plan:** Strategy sets out BCC’s strategic approach to delivering new housing, and therefore can inform the development of the new Local Plan.

**Relevant objectives for Bristol Local Plan:** Key ‘areas for change’ identified within the Delivery Plan which are relevant to Local Planning policy include: annual housing delivery programme (with market and direct delivery, grant funding and land release mechanisms); interventions to remove barriers to delivery, including support for innovation and community-builds; and opportunities to accelerate strategic housing delivery.

Opportunities to increase housing delivery were noted as including: Local Plan, Urban Living SPD, Affordable Housing Practice Note, Self-Build/Custom Build Guidance Note, and the Community-led Housing Guidance Note.

### **Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

The emerging target for Bristol is around 33,000 homes and the need for affordable homes in Bristol is projected to be 18,800 between 2016 and 2036. **Objective 1** will help test whether development / draft policies would enable the target of 2000 houses per annum (and affordable housing requirements) to be met (see recommendations made following review of BCC Corporate Strategy and Housing Strategy).

### **Bristol City Council Climate Emergency Action Plan 2019**

**Relationship with Bristol Local Plan:** The Climate Emergency Action Plan sets out the climate emergency actions that the council will take in response to its recent Climate Emergency declaration, which was passed by Full Council as part of a motion in November 2018. It is to be read alongside the One City Plan and the council’s Corporate Strategy 2018- 2023, which will be updated in 2020.

**Relevant objectives for Bristol Local Plan:** Key actions include:

- Deliver significant low carbon energy infrastructure in the city via the City Leap Project / Energy Partnership;
- For Bristol to be carbon neutral by 2030, taking into account both direct and indirect emissions;
- Working with other governments (both within the UK and internationally) to determine and implement best practice methods to limit global warming to less than 1.5°C; create low carbon jobs and businesses;
- To build and retrofit homes;

- Provide clean and sustainable travel;
- Generate clean, renewable energy; and
- Reduce the carbon footprint of consumption.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

See recommendations made following review of One City Climate Strategy, above. Zero carbon targets and energy efficient standards may be incorporated within **Objective 18** decision-making criteria, although there is a risk that these may change across the Plan Period. Feasibility work is currently being undertaken to understand options for a mass transit system for the city region, therefore decision-making criteria for **Objective 13** should be sufficiently flexible to support delivery of sustainable transport systems.

**New Protection for Open Space – Consultation Paper March 2019**

**Relationship with Bristol Local Plan:** The paper forms part of the policy evidence base for the Local Plan Review in relation to the city’s Local Green Spaces. In accordance with the NPPF, it is proposed that the Local Plan Review introduces Local Green Space and ‘Reserved Open Space’ designation for other open spaces of public value.

**Relevant objectives for Bristol Local Plan:** Designate Local Green Space and ‘open spaces of public value’ in alignment with National Planning Policy Framework and National Planning Policy Guidance.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

Decision-making criteria for **Objective 6** could be amended to specifically test draft policies against the objectives: *‘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?’*

**Bristol Urban Potential Assessment 2018**

**Relationship with Bristol Local Plan:** As part of the evidence base for the now withdrawn West of England Joint Spatial Plan (JSP), BCC carried out an Urban Potential Assessment to determine the potential capacity within the urban area of Bristol to deliver additional residential development. The assessment forms part of the evidence base for the Local Plan Review.

**Relevant objectives for Bristol Local Plan:** Based on Economic Development Needs Assessment (EDNA) findings, the assessment indicates that it may be appropriate for the urban potential assessment to consider the potential for releasing underused employment land to contribute to meeting the housing target in Bristol in the period up to 2036.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

**Objective 2** of the framework could include a refined decision-making criterion to test draft policies against their ability to support the suitable/appropriate release of previously developed land, as follows: *‘Would development or policy provide an opportunity for the reuse or regeneration of previously developed land?’*. A second criterion could explore whether policy or development would provide an opportunity to maximise densities in these previously developed, sustainable locations.

### 2.3.5 Supplementary Planning Documents and Development Frameworks

#### **Managing the development of HMOs SPD**

**Relationship with Bristol Local Plan:** The SPD forms a material consideration in the development management process. While SPDs do not necessarily guide the Local Plan, it is acknowledged that newer SPDs do introduce new objectives which are likely to be relevant in the development of the Local Plan.

**Relevant objectives for Bristol Local Plan:** The SPD supports the implementation of existing Policy DM2 of the Site Allocations and Development Management Policies (SADMP), with the overall objective to reduce harmful impacts of new HMO development.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** **Objectives 1 and 2** remain relevant and align with the broad purpose of the SPD, however, revision to detailed criteria for **Objective 2** could be undertaken to reflect guidance contained within the adopted SPD, suggested as follows: *‘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?’*

#### **Urban Living SPD**

**Relationship with Bristol Local Plan:** The Urban Living SPD forms a material consideration in the development management process and seeks to secure quality development within Bristol's context. The SPD focuses on key themes of context, liveability, place, and land; and offers guidance in relation to policies across the Core Strategy and SADMP (existing Local Plan policies). The SPD will be updated following examination and adoption of the new Local Plan.

**Relevant objectives for Bristol Local Plan:** While the strategic context in the form of the JSP has fallen away, the SPD sets out principles to achieve good design through ‘Urban Living’<sup>29</sup>. This includes providing a context-led approach to urban intensification; focussing growth on transport hubs and district centres as well as the city centre; creating more mixed and balanced communities; and providing greater lifestyle choices and enhancing the overall performance of the urban area.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:**

- Decision-making criteria for **Objective 2** could include criteria to test policy or development against achieving appropriate density and whether these would be directed towards the most sustainable locations.
- **Objective 10** decision-making criteria could account for localised environmental impacts of higher density and taller building on townscape.
- **Objective 16** decision-making criteria could also reflect the principles of innovative and sustainable building design/construction (reducing whole-cycle emissions) *‘Would development*

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<sup>29</sup> ‘Urban Living’ is defined in the SPD as ‘compact, characterful and healthy urban areas where people can live, work and play with good access to high quality walking and cycling linkages and public transport.’

*or policy ensure a high standard of sustainable design and construction through minimising resource use, energy efficiency and waste production?'*

### **Bristol Temple Quarter Enterprise Zone Framework**

**Relationship with Bristol Local Plan:** The Framework forms a material consideration in the development management and delivery of the Temple Quarter Enterprise Zone.

**Relevant objectives for Bristol Local Plan:** References are made to enhancing the significance of waterways to wildlife in the EZ and wider City Centre.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** Townscape and Landscape **Objectives (10-12)** are not considered to require amendment; however, their decision-making criteria could be more positively rephrased to account for enhancing the significance of waterways to wildlife.

### **Affordable Housing Practice Note 2018**

**Relationship with Bristol Local Plan:** The Affordable Housing Practice Note explains how the Council's affordable housing policies are to be implemented. This update to the Practice Note was published in 2018 and provides interim measures until the review of the Bristol Local Plan is completed and a revised plan is adopted.

**Relevant objectives for Bristol Local Plan:** To encourage the provision of affordable housing, the Council has introduced a 'threshold' approach to policy BCS17 for an interim period that will apply in Bristol Inner West and Inner East zones. In these zones, applications meeting or exceeding 20% affordable housing can follow a 'Fast Track' route.

**Potential SA Framework Recommendations – Objectives and Objective Decision-making criteria:** Recommended amendments to **Objective 1** decision-making criteria are similar to those proposed following the review of Bristol Housing Strategy and Housing Delivery Plan.

### **2.3.6 Documents encountered post March 2020 and during the preparation of the Interim SA**

Additional strategies, plans and programmes were also identified during the development of the Interim SA, after the preliminary review of the baseline and recommendations to the SA Framework as part of this Baseline Update. Where relevant, these documents informed the final assessment of the 'current situation' and helped to shape recommendations for future policy and site allocation development.

The following documents were encountered during the production of the Interim SA: the State of Bristol June 2020; the State of Bristol March 2021; BCC School Census Jan 2019; and Deprivation in Bristol 2019. To account for additional changes based on the Covid-19 pandemic and the UK-EU Trade and Cooperation Agreement, the baseline will need to be updated as part of the next iteration of the SA.

## 2.4 Baseline Review

This section presents a review of the relevant baseline studies and analyses that have emerged since the publication of the Scoping Report in February 2018. For ease of considering implications for the SA Framework, the findings are presented under the SEA topic headings incorporated within the original SA Framework included within the Scoping Report.

### 2.4.1 Population, Housing and Communities

The following baseline sources were identified as including information relative to this topic:

- Bristol Housing Delivery Plan 2017-2020
- Bristol Housing Strategy 2016-2020
- Bristol Housing Market 2017
- Bristol One City Plan

The key indicators, trends and performance identified within these information sources are summarised below.

#### **Key indicators, trends and performance**

**New homes including affordable housing:** The population of Bristol is estimated to have increased by 11.7% since 2008 and, if recent trends continue, it is expected to increase by 15% up until 2043<sup>30</sup>. This projected increase is higher than the projection for England (10%) and all other English Core Cities.

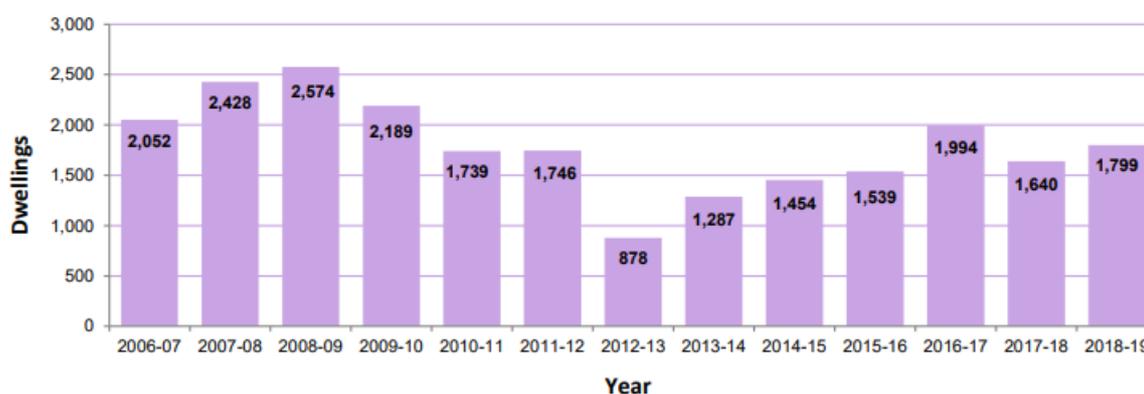
The increasing population is resulting in an increasing demand for housing in the city. In the Corporate Strategy (2018-2023), a commitment was set to deliver 2,000 new homes per year, including 800 affordable, by 2020. However, this target has not been achieved since 2010, and in 2019, the number of new dwellings completed was 1,799 homes. In addition, a large proportion (16.4%) of the total number of all dwellings completed since 2006 have been student accommodation units<sup>31</sup>.

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<sup>30</sup> Bristol City Council (2020) The Population of Bristol. Accessed online at: <https://www.bristol.gov.uk/documents/20182/33904/The+population+of+Bristol+April+2020.pdf/e8fff118-2d83-f9c4-a7eb-dc443b469256>

<sup>31</sup> Bristol Residential Development Survey (November 2019)

Figure 1 Annual dwelling completions (2006 – 2019) (Source: Bristol Residential Development Survey November 2019)



**Homelessness and temporary accommodation:** There has been a rising trend in the number of homelessness acceptances in Bristol from 489 in 2013/14 to 979 in 2016/17<sup>32</sup>. Alongside this, between 2014 and 2017, the number of households living in temporary accommodation rose, reflecting rising property prices, welfare reform and increasing rents in the private rented sector. Similarly, the number of households in England living in temporary accommodation has risen over the same period, and in 2018, over 70% of households living in temporary accommodation had children<sup>33</sup>.

### Sustainability issues

The relevant sustainability issues identified within emerging baseline sources are:

- An above average (and rising) rate of population growth when compared with the average for England and Wales;
- A substantially larger rise in average house price when compared with England and Wales; and
- A need to increase housing delivery, particularly affordable housing, to meet targets.

**Potential SA Framework Recommendations – Objectives and Decision-making criteria:** The continued increasing trend of insufficient provision of affordable housing is captured in **Objective 1**. However, affordable housing does not feature within the decision-making criteria and therefore the framework could be revised to include this.

### *2.4.2 Health and Inequalities*

The following baseline sources were identified as including information relevant to this topic:

- Air Quality Plan for Nitrogen Dioxide in the UK (2017)
- Local Cycling and Walking Infrastructure Plan – Draft (2020)
- Traffic Clean Air Zones – Consultation Report 2019
- Bristol Health and Wellbeing Strategy (2020-25)
- Bristol One City Plan

<sup>32</sup> BCC Homelessness Review (2018) Homelessness and Rough Sleeping Evidence Base

<sup>33</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/ukhomelessness/2005to2018>

The key indicators, trends and performance identified within these information sources are summarised below.

### **Key indicators, trends and performance**

**Health inequality:** Inequality within Bristol persists, with stark differences between the most and least economically deprived areas, particularly in relation to health outcomes. Around 69,000 people in Bristol live in the bottom 10% most deprived parts of England (including 17,800 children and 10,500 elderly people). In total, 20% of all children in Bristol live in poverty.

Life expectancy in Bristol for both men and women as a whole is worse than the national average. Between 2004 and 2018 life expectancy in Bristol rose by less than 0.5 years for men however this has not improved for women. Men living in the most economically deprived 10% areas of the city live approximately 9.6 years less than men living in the least economically deprived 10% areas. The Bristol One City Plan sets a vision for the gap in healthy life expectancy to have reduced by 10% for both men and women by 2025.

**Poor air quality:** In the UK, poor air quality is the largest known environmental risk to public health. Bristol is exceeding legal limits for nitrogen oxide (NOx) in the central area and key arterial roads which correlates with some of the areas of highest population growth over recent years. It is estimated that approximately 300 deaths per year in the city are related to poor air quality. Whilst levels of nitrogen oxide still exceed legal limits, there has been a decreasing trend since 2010<sup>34</sup>.

At a national level, poor air quality has been associated with less affluent areas. As a whole in Bristol, the correlation between areas of multiple deprivation and high levels of PM2.5 and NOx air pollution does not necessarily indicate that socioeconomically disadvantaged areas are among the most exposed, however, there is an exception in Lawrence Hill which has both some of the highest levels of deprivation and air pollution in the city<sup>35</sup>.

In 2019, Bristol City Council held a consultation on options for a Traffic Clean Air Zone to support the city to achieve compliance with the legal standard for NOx levels by 2025.

### **Sustainability issues**

The relevant sustainability issues identified within emerging baseline sources are:

- Significant gap in life expectancy between most and least deprived areas of Bristol; and,
- Air quality in Bristol exceeds legal limits which has health implications for the city's residents.

**Potential SA Framework Recommendations – Objectives and Decision-making criteria:** The presence of inequalities and, in particular health inequalities, in Bristol is captured through **Objective 5** and **Objective 6**. However, decision-making criteria relating to **Objective 5** could be strengthened, recognising that health inequality has a spatial element. As such, the framework could

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<sup>34</sup> <https://www.uk100.org/wp-content/uploads/2019/05/Bristol-City-Health-and-Economic-Impact-Assessment-study.pdf>

<sup>35</sup> <https://www.uk100.org/wp-content/uploads/2019/05/Bristol-City-Health-and-Economic-Impact-Assessment-study.pdf>

be revised as follows: *Would development or policy contribute to improvements in the built environment and health in deprived areas?*

The questions relating to **Objective 6** could also be strengthened as follows to recognise air quality as a key health issue in the city.

### **2.4.3 Economy and Employment**

The following baseline sources were identified as including information relevant to this topic:

- Economic Development Needs Assessment (EDNA) 2016

The key indicators, trends and performance identified within these information sources are summarised below.

#### **Key indicators, trends and performance**

The level of unemployment in Bristol was 3.8% in 2019. This sits below the UK unemployment rate which has continued to fall over recent years, reaching a record low of 4.2% in March 2019.

Whilst the unemployment rate in Bristol is low in comparison to other British Core Cities, and below the national average, there is a spatial distribution to unemployment in Bristol with unemployment generally located in more deprived areas of the city.

#### **Sustainability issues**

The relevant sustainability issue identified within emerging baseline sources are that unemployment in Bristol is generally located in more deprived areas of the city where people are reliant on public transport and don't have access to cars.

**Potential SA Framework Recommendations – Objectives and Decision-making criteria:** The need to ensure that employment is considered through the framework is adequately captured in **Objective 8: To support the economy and ensure that there are suitable opportunities for employment**, and its supporting decision-making criteria. No revisions to the framework are proposed.

### **2.4.4 Townscape and Landscape**

The baseline review found no emerging sustainability issues relating townscape and landscape.

It is worth noting that typically townscape impacts are less easily quantified and are therefore less likely to be captured in baseline data, however are more likely to be reflected in policy and programmes. Recently produced documents have emphasised the important role of green infrastructure in mitigating and adapting to climate change along with the wider health and wellbeing impacts, and Historic England flagged the need to consider the effects of the plan on townscape and key views. These issues have been covered above respectively.

### **2.4.5 Transport and Movement**

The following baseline sources were identified as including information relevant to this topic:

- Local Cycling and Walking Infrastructure Plan – Draft (2020)
- West of England Bus Strategy – Draft (2020)

- Bristol Transport Strategy (2019)
- Bristol One City Climate Strategy (2020)

The key indicators, trends and performance identified within these information sources are summarised below.

### **Key indicators, trends and performance**

**Modes of transport:** A high proportion of commuters in Bristol travel by car (53%) and this is aligned to the West of England average of 55%. Taking population growth into account, the proportion of commuters travelling by car would need to be reduced to 43% of commuters by 2036 in order to maintain traffic at its current levels. The 2018 Quality of Life Survey<sup>36</sup> results in Bristol showed that 80% of residents view traffic congestion to be a local issue impacting perceived quality of life.

Bristol has seen an increase in the amount of people using public transport, walking and cycling. Compared to other UK cities, Bristol has high levels of walking and cycling. The proportion of the population who cycle to work has increased by 64% between 2011 and 2018, and the number of bus passenger journeys (per head of population) increased by 44% between 2012 and 2018 (in comparison to a national decrease). However, the level of car ownership in Bristol remains high, with Bristol experiencing the second highest level of car ownership of the British Core Cities, although compared to other cities, vehicle miles per person is low<sup>37</sup>.

**Employment opportunities:** Public transport is vital for the provision of employment opportunities with 40% of jobseekers lacking personal transport or noting that poor transport is a key barrier to employment.

The predominant travel movement in the city remains to and from central Bristol, and the employment sites in the north at Filton Abbey Wood and surrounding areas. It is recognised that there is a need to improve links to employment sites at Avonmouth and Lawrence Weston to areas of deprivation / unemployment in east and South Bristol. The Economic Development Needs Assessment indicates that South Bristol and Fringe is a relatively deprived area which needs to be addressed through investment and policy to provide employment land.

### **Sustainability issues**

The relevant sustainability issues identified within emerging baseline sources are:

- Traffic congestion is an issue in Bristol and car dependency needs to be reduced to mitigate adverse environmental effects, including on air quality and the health of the city's population.
- The need for public transport routes to provide access to opportunities across the city.

### **Recommended revisions to the framework**

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<sup>36</sup> <https://www.bristol.gov.uk/documents/20182/33896/Quality+of+Life+survey+2017-18+report+%28final%29.pdf/502d1c1d-24b0-5df5-a3f0-25734bd782af>

<sup>37</sup> <https://www.bristol.gov.uk/documents/20182/33395/Bristol+Baseline+Report+April+2019.pdf/76006e21-ab62-fa44-235a-2c5285f1dc2e>

**Objective 13** of the framework states that policy should '*encourage a demonstrable modal shift and reduce the need to travel*'. In order to meet this objective, the framework assesses whether the development would offer an opportunity to improve access to and quality of sustainable transport modes for all communities and throughout the city.

The questions relating to Objective 13 could also be strengthened to support the transition towards more sustainable and inclusive transport modes, and to address the sustainability issue of high traffic congestion:

- 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?
- Would development or policy offer an opportunity to support the delivery of new transport and digital infrastructure?

#### **2.4.6 Climate, Energy and Waste**

The following baseline sources were identified as including information relevant to this topic:

- Joint Waste Core Strategy
- Wessex Water Resources Management Plan
- Bristol Transport Strategy
- Bristol One City Plan
- Bristol One City Climate Strategy
- Bristol Avon Catchment Management Plan

The key indicators, trends and performance identified within these information sources are summarised below.

#### **Key Indicators, trends and performance**

Since 2005, carbon emissions in Bristol have reduced by 33%, and per capita emissions have reduced by 45%<sup>38</sup>. The city's carbon emissions equate to approximately 3.7 tonnes of CO<sub>2</sub>e per person per year<sup>39</sup> which is below the UK average emissions per capita in 2015<sup>40</sup>. However, to meet the city's carbon neutral target, the rate of reduction will need to be 1.6 times the previously observed rate, indicating that more intervention is required.

Bristol City Council recently declared a goal for Bristol to be carbon neutral and climate resilient by 2030 and set out its vision to achieve this in the One City Climate Strategy. The strategy sets a goal for all buildings including new buildings in the city to be carbon neutral and climate resilient by 2030. Comparatively, the UK government was previously committed to introducing 'zero carbon' new homes from 2016 however this was abandoned in 2015. Since 2019 in the UK all new public

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<sup>38</sup> <https://www.bristol.gov.uk/documents/20182/32947/State+of+Bristol+-+Key+Facts+2018-19.PDF>

<sup>39</sup> <https://www.bristol.gov.uk/documents/20182/33395/Bristol+Baseline+Report+April+2019.pdf/76006e21-ab62-fa44-235a-2c5285f1dc2e>

<sup>40</sup> <https://www.centreforcities.org/wp-content/uploads/2018/01/18-01-12-Final-Full-Cities-Outlook-2018.pdf>

buildings are required to be 'nearly zero' 2019 in accordance with Regulation 25B of the Building Regulations 2010.

The UK Government held consultation on the 'Future Homes Standard' in 2019 with an expectation that an average home built to the future standard will have 75-80% less carbon emissions than one built to current energy efficiency requirements (Part L of the Building Regulations 2010), likely to be achieved through high fabric standards and a low carbon heating system.

### **Sustainability issues**

Based on current carbon projections founded on historic emissions, under the existing investment and policy context (in place up to early 2019), Bristol would not meet carbon neutral targets by 2030 or the UK's carbon reduction target.

In relation to water quality, the following are identified:

- Areas within the local authority area of Bristol have an overall Water Framework Directive Status as 'moderate' (2016), with only 24% of the wider Bristol Avon Catchment (outside BCC's local authority boundary) classified as having 'good ecological status'.
- Low river flows within the wider Bristol Avon Catchment associated with abstraction for water supply.
- Moderate to poor water quality linked to high phosphate levels, of which are linked to treated sewage discharges and overflows; and urban diffuse pollution.
- Flooding associated with rapid run-off from urban hard surfaces.
- Climate change impacts, including more extreme weather resulting in flooding and/or droughts within the wider Bristol Avon Catchment.

### **Recommended revisions to the framework**

**Objective 18** of the framework states that development should '*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*'.

As Bristol City Council has declared a goal for the city to become carbon neutral by 2030, and the UK government is beginning to encourage carbon neutral development in buildings, the question around 'aspirational targets' for energy efficiency could be strengthened to encourage all building developments to have targets for energy efficiency.

### 3. Sustainability Appraisal Framework Update

Table 1 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> <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> <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> <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> <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? <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)? <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>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>DMC9:</b> Would development or policy result in a net gain of community or service facilities?</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</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	<ul style="list-style-type: none"> <li>Would development</li> </ul>	<ul style="list-style-type: none"> <li><b>Additional:</b> <u>Would development or policy contribute to improving air</u></li> </ul>	<ul style="list-style-type: none"> <li><b>DMC12:</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)
	<p>in England in 2019 than in 2015 - 15% of residents (70,400 people) live in 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>41</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>42</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>	<p>promote healthy lifestyles across the city.</p>	<p>contribute to positive wellbeing, e.g. access to open space and pleasant 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>quality?</p> <p><b>Informed by:</b> UK Clean Air Strategy; Bristol City Council Clean Air Plan.</p> <ul style="list-style-type: none"> <li><b>Refinement:</b> Would <u>development or policy</u> contribute to positive wellbeing and <u>healthy lifestyles, including good living conditions and access to open spaces, pleasant surroundings and healthier food choices</u>?</li> <li><b>Informed by:</b> Updated PPG and Bristol Health and Well-being Strategy 2020-2025; New Protection for Open Space – Consultation.</li> <li><b>Retained:</b> Would development or policy make walking and cycling easy and attractive as routine methods of transport?</li> </ul>	<p>contribute to improving air quality?</p> <ul style="list-style-type: none"> <li><b>DMC13:</b> 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?</li> <li><b>DMC14:</b> Would development or policy make walking and cycling easy and attractive as routine methods of transport?</li> </ul>
		<p>7. Ensure access to education and learning for all sections of society.</p>	<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> </ul>	<p>8. To support the economy and ensure that there are suitable opportunities for employment.</p>	<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> </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?</li> <li><b>Informed by:</b> Draft SBSUD Strategy 2018.</li> <li><b>Additional:</b> Would development or policy support opportunities for <u>growth</u> (i.e. creation of employment spaces, supporting infrastructure</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</li> </ul>

<sup>41</sup> <https://www.bbc.co.uk/news/uk-england-bristol-45976340>

<sup>42</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".

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	<ul style="list-style-type: none"> <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 'hotspots' that are amongst some of the most deprived areas in the country.</li> <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 increasingly 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>		<ul style="list-style-type: none"> <li>Would development regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment?</li> <li>Would development result in the loss of any existing strategic employment opportunities?</li> </ul>	<p>etc.) in priority employment sectors?</p> <p><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)</p> <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?</li> <li><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></li> <li><b>Informed by:</b> BCC Climate Strategy; Draft SBSUD Strategy 2018; Bristol One City Plan</li> </ul>	<p>support opportunities for growth (i.e. creation of employment spaces, supporting infrastructure etc.) in priority employment sectors?</p> <ul style="list-style-type: none"> <li><b>DMC19:</b> Would development or policy regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment?</li> <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> </ul>
		9. Ensure access to a range of shopping facilities for all sections of society.	<ul style="list-style-type: none"> <li>Would development offer the opportunity to support and enhance the vitality and viability of retail centres?</li> <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> enhance and diversify the vitality and viability of local / retail centres?</li> <li><b>Refinement:</b> Would <u>development be, or policy ensure, development is</u> within easy walking distance of retail services?</li> </ul>	<ul style="list-style-type: none"> <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>
			10. To ensure the protection and enhance historic environment and its setting.	<ul style="list-style-type: none"> <li>Would development result in the degradation of heritage assets?</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?</li> <li><b>Informed by:</b> Urban Living SPD.</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>	11. To ensure the protection and enhancement biological and geological assets and improve the quality of wildlife habitats.	<ul style="list-style-type: none"> <li>Would development result in the degradation of biological and geological assets?</li> </ul>	<ul style="list-style-type: none"> <li><b>Refinement:</b> Would development or policy protect biological, geological and nationally or internationally designated nature conservation assets from adverse effects?</li> <li><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></li> <li><b>Informed by:</b> NPPF 2019; National Design Guide; 25-Year Environment Plan.</li> </ul>	<ul style="list-style-type: none"> <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> </ul>
		12. To ensure the protection and enhancement green and blue infrastructure and ensure access to a variety of open space and recreation.	<ul style="list-style-type: none"> <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 <u>development or policy maximise</u> the opportunity to <u>provide multifunctional green infrastructure?</u></li> <li><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>DMC27:</b> Would development or policy maximise the opportunity to provide multifunctional green infrastructure?</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Transport is responsible for 32% of carbon</li> </ul>	13. To encourage a	<ul style="list-style-type: none"> <li>Would development offer</li> </ul>	<ul style="list-style-type: none"> <li><b>Refinement:</b> Would development <u>or policy</u> offer an opportunity to</li> </ul>	<ul style="list-style-type: none"> <li><b>DMC28:</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)
and Movement	<p>dioxide (CO<sub>2</sub>) 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 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>demonstrable modal shift and reduce the need to travel.</p>	<p>an opportunity to improve access to and quality of sustainable transport modes for all communities, to allow sustainable 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>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></p> <p><b>Informed by:</b> BCC Climate Strategy; Bristol One City Plan; updated PPG and National Design Guide; Bristol Transport Strategy 2019; West of England Local Cycling and Walking Infrastructure Plan.</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?</li> </ul> <p><b>Informed by:</b> Bristol Transport Strategy 2019; Bristol One City Plan.</p>	<p>offer an opportunity to improve access to and quality of sustainable transport modes (walking, cycling and public transport) for all communities?</p> <ul style="list-style-type: none"> <li>• <b>DMC29:</b> Would development or policy offer an opportunity to support the delivery of new transport and digital infrastructure?</li> </ul>
		<p>14. To maintain and improve the existing highway network.</p>	<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>
Climate, Energy and Waste	<ul style="list-style-type: none"> <li>• Whilst CO<sub>2</sub> 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 NO<sub>2</sub> and PM<sub>10</sub> 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> </ul>	<p>15. To reduce the risk of flooding from all sources.</p>	<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>
		<p>16. Sustainably manage natural resources, including water demand and quality and reducing waste being landfilled.</p>	<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?</li> <li>• <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></li> <li>• <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></li> <li>• <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>
		<p>17. Minimise air and noise</p>	<ul style="list-style-type: none"> <li>• Would development</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Retain:</b> Would development minimise exposure to pollution or offer</li> </ul>	<ul style="list-style-type: none"> <li>• <b>DMC38:</b> Would development minimise</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)
	<ul style="list-style-type: none"> <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> <p>Sources: <i>Scoping Report 2018; Bristol One City Climate Strategy; BCC Corporate Strategy 2018-2023; The State of Bristol June 2020.</i></p>	<p>pollution</p> <p>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.</p>	<p>minimise exposure to pollution or offer opportunity to reduce pollution?</p> <ul style="list-style-type: none"> <li>Would aspirational targets for energy efficiency in new development be set?</li> <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>	<p>opportunity to reduce pollutions?</p> <ul style="list-style-type: none"> <li><b>Informed by:</b> Updated PPG; Clean Air Strategy 2019; Air Quality Plan for NO2 in the UK; WHO Strategy<sup>43</sup>).</li> <li><b>Refinement:</b> Would development <u>or policy</u> enable aspirational targets for energy efficiency to be achieved?</li> <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? <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>44</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> <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>exposure to pollution or offer opportunity to reduce pollutions?</p> <ul style="list-style-type: none"> <li><b>DMC39:</b> Would development or policy enable aspirational targets for energy efficiency to be achieved?</li> <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>43</sup> The Strategy sets out a long-term target to reduce the population's exposure to PM2.5.

<sup>44</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.

#### 4. Summarising the ‘Current Situation’ and sustainability context

Using the themes of the SEA Directive, this section summarises the ‘current situation’ (the adopted policies and existing environmental baseline) for each sustainability theme and presents an initial assessment of the likely future without the implementation of the Bristol Local Plan, based upon current policy approaches, environmental baseline data and projected trends.

Table 2 below summarises the ‘current situation’ using information from the Scoping Report 2018 and this Baseline Update provide on the baseline conditions and key sustainability issues facing the Plan area.

In relation to the SA Framework, good practice guidance considers that potential effects need to be quantified where possible, or a judgement made against the baseline ‘current situation’ where this is not achievable. Assessment of the draft policies and site allocations as set out in the March 2019 Consultation Draft Plan will therefore consider both the ‘current situation’ for the various SEA topics and the key sustainability issues identified when appraising the sustainability effects and recommending potential mitigation requirements.

**Table 2 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>45</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>46</sup>. Without intervention, affordability issues and supply are likely to increase.</p> <p>Data indicates an increasingly diverse community within Bristol, with increasing</p>

<sup>45</sup> ORS (2015, 2018) Wider Bristol HMA Strategic Housing Market Assessment

<sup>46</sup> SD14J Topic Paper 6 Affordable Housing April 2018

SEA Topic	Current situation	Likely future without Plan	Key sustainability issues
			<p>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 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> </ul>

SEA Topic	Current situation	Likely future without Plan	Key sustainability issues
			<ul style="list-style-type: none"> <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 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.</p>
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>

## 5. Summary of the Baseline Update

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').

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 was encountered 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 2). This will continue to be updated as the plan evolves.

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.